

# Privacy Policy

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## Commitment to the Protection of Privacy

Air China Limited (hereinafter referred to as “Air China”, “we”, “us” or “our”) understands the importance of personal privacy. We undertake security measures in accordance with local laws and regulations and are committed to protecting your personal information. The Air China Privacy Policy (“Privacy Policy”) explains how we collect, use, store, share and transfer your personal information when you use our products and/or services as well as the way we provide for you to access, update, delete, and protect such information.

This Privacy Policy will help you understand the following:

- [1. How we collect and use your personal information](#)
- [2. How we use cookies and similar technologies](#)
- [3. How we share, transfer, and publicly disclose your personal information](#)
- [4. How we protect and store your personal information](#)
- [5. Your rights](#)
- [6. Protection of minors' information](#)
- [7. How your personal information is transferred globally](#)
- [8. How we update this policy](#)
- [9. How to contact us](#)

This Privacy Policy applies to products or services made available to you by Air China such as reservation purchases, passenger and baggage transportation, the PhoenixMiles frequent flyer program, etc. It is important to note that this privacy policy does not extend to products and services offered by third parties.

**Before using Air China products or services, please ensure you have carefully read and understood this policy.** If you have any questions, comments or suggestions on the content of this policy, you may contact us through our customer service hotline, or via email at [dpo@airchina.com](mailto:dpo@airchina.com).

## 1. How we collect and use your personal information

**Personal information** refers to various information recorded electronically or otherwise that can be used alone or in combination with others to identify a natural person or reflect the activity of a natural person.

**Personally sensitive information** refers to the personal information, if breached, illegally provided or abused, may endanger the safety of people and property, and can easily result in damages to personal reputation, physical and/or mental health, or discriminatory treatment.

We collect and use your personal information for the purposes described in this policy:

### **(1) You must authorise us to collect and use your personal information.**

Our products and/or services consist of some core features, including those necessary for seat reservation, ticket purchase and passenger transportation, and those necessary to improve our products and/or services and to secure transactions. **We may collect, store, and use the following information about you to achieve these features. If you do not provide the relevant information, you will not be able to enjoy the products and/or services we provide.** The features include:

### 1. The booking of reservations and ticketing services

In order to complete your booking, you will need to provide the following information: **name, gender, nationality, date of birth, type of valid travel document, ID number, ID expiration date, country of issuance, contact number and email address. If you are booking a flight via/to/from U.S. territory, you will also need to provide your residential address of origin and destination according to local regulatory requirements.** In order to complete payment and ticketing, you will need to provide the following payment information: **credit/debit card number, expiration date, CVV, billing address, cardholder name, mobile number, ID type, ID number.** The above payment information is only used for the transaction in question and will not be stored.

If you wish to accumulate airline frequent flyer miles, you will also need to provide the following additional information: name and card number of the Frequent Flyer. To improve our services, we may ask you for additional information such as the name of your travel partner, the name and phone number of an emergency contact. Provision of such information is optional and will not affect your reservation and purchase.

The above information provided by you will continue to be authorised for use during your use of the services above. We will make no further use of the information and delete it, when you cancel your account.

### 2. Passenger and baggage transportation services

Your journey will be smoother if you allow yourself ample time to comply with Check-in time. When checking in at the airport, we need to check your valid travel documents to confirm that the information you used to purchase the ticket(s) is the same. In some cases, you will also be asked to provide payment information such as the credit card used for ticket purchase as part of verification procedures.

If you choose to use our self-service check-in counters, you will need to log into your account in advance. Otherwise, you will need to use your name, your ticket number or travel document number used to book your flights for self-service check-in. **During the check-in process, we may need you to provide or verify your travel document information including: name, gender, nationality, date of birth, ID number, ID expiration date, country of issuance. If you are booking a flight via/to/from the U.S. territory, you will need to verify or provide information on the residential address of origin and destination as per local regulatory requirements.**

### 3. Helping you become our members

In order to join our PhoenixMiles membership, you will need to provide **your first name, last name, gender, phone number, email address, ID type, ID number and password.** After such information has been supplied, we will provide you with a PhoenixMiles membership card number. If you only require basic services such as browsing, searching for air tickets, purchasing additional services and flight services, you do not need to register as a member and provide the above information.

For some processes, you must provide additional information so that we can process your registration and carry out subsequent tasks, such as mailing out your membership card or sending an email mileage bill. Such information includes **your birthday, email address, residence or work address.** In addition, when you sign up for PhoenixMiles or during the membership period, you may voluntarily provide additional information such as your interests and preferences. In order to streamline data entry, we will directly retrieve information from the application form and the registration process. Such information includes your registration date and preferred way of communication. If you do not provide such information, it may affect your use of personalized membership services, but not Air China products or services, including basic browsing, searching for air tickets, additional service purchases and flights taking. When you cancel your account, we will make it anonymous or delete your personal information as soon as possible in accordance with applicable laws and regulations.

#### **4. Providing additional and special services**

**If you require assistance for unaccompanied children or use of special services such as stretchers, we may ask you to provide additional personal information according to the type of service required: a disability or medical certificate, name and contact number of the pickup person/deliverer, ID number, etc.**

The above information provided by you will continue to be used during your use of the services above. Upon termination of the services, we will delete your information as soon as practicable in accordance with applicable laws and regulations.

#### **5. Customer service and after-sales function**

Our customer service and after-sales function use your account and order information.

To ensure your account security, our call center customer service and online customer service center will use your account information to verify your identity. When you need us to provide customer service and after-sales support related to your order information, we will look into your order information. You may also provide additional information to our customer support staff, in situations such as making changes to shipping address, contact person or contact number.

#### **6. Transaction security**

To improve your system security when using our products and/or services and to prevent phishing scams and protect account security, we may access your browsing information, order information, commonly used software information and device information for the purpose of risk assessment. We will also determine your account risk by collecting your device information to analyse Air China system issues, gather statistical traffic, troubleshoot possible risks and to check when you choose to send us abnormal information.

#### **(2) You may choose whether or not to authorise us to collect and use your personal information.**

To enhance your service experience, your personal information may be collected and used in our additional features outlined below. If you do not provide such personal information, you can still use the basic functions of booking, ticketing, etc., but you may need to fill in some information repeatedly. These additional features include:

1. Personalized recommendations based on location: we use your geographical information to provide you with products and services that better suit your needs based on your location (for example, a preferential route recommendation to your nearest airport).
2. Camera features: we access your camera to enable you to participate in marketing activities by scanning or shooting relevant content, upload custom avatars or upload refund vouchers.
3. Image upload features: we access your photo album to enable you to upload photos, pictures or videos in order to change your avatar or use as evidence when resolving a problem with online customer support.
4. Additional features based on voice technology: we access your microphone to enable you to use the voice-check flight function and to enable you to communicate with our customer support team.
5. Contact list features: we access your contact list to enable a more convenient ticket purchase system that can auto-fill your information for you. You no longer have to manually enter contact information.
6. Calendar feature: we access your calendar in order to add your itinerary to the date of your trip so that you will be reminded on the day you travel.

These additional features may require you to give us access to your geographical information (location information), camera, photo album (photo gallery), microphone, contact list, and calendar, to achieve the collection

and use of information involved in such features. You may decide to turn these permissions on or off at any time (we will guide you through the setup process). Please note that by enabling these permissions, you authorise us to collect and use such personal information to perform the above functions. If you retract these permissions, we will no longer continue to collect and use such information. We will also be unable to provide you with the above functions corresponding with the revoked permissions. However, removing permissions does not affect the processing of personal information previously performed based on your authorisation.

### **(3) Exceptions to obtaining authorisation for information collection**

According to relevant laws and regulations, collecting your personal information in the following situations does not require your authorised consent:

1. Where information is relevant to national security and national defense security;
2. Where information is relevant to public safety, public health, and major public interests;
3. Where information is relevant to criminal investigation, prosecution, trial and execution;
4. When to protect the material and personal rights of another individual and it is difficult to acquire your consent.
5. Where the personal information collected has been disclosed to the public by yourself;
6. Where the personal information is legally and publicly disclosed information, such as news reports, government information disclosures, etc.;
7. When required to sign a contract according to your requirements and specifications
8. Where information is required to maintain safe and stable operation of the products and services provided (e.g., for the purpose of troubleshooting or problem-solving of our products and services)
9. Where the information is otherwise required by laws or regulations

Should we stop operating Air China's products or services, we will stop collecting your personal information in a timely manner, and notify you of the notice of suspension either one by one or in an announcement, as well as delete or anonymize the personal information held.

### **(4) Obtaining your information from a third party**

We may obtain personal information from a third party that you authorise to share and transfer your personal information to Air China for the reservation of ticket or service after you agree to this Privacy Policy. For example, you may book a flight ticket at Air China's flagship store or through an online agent on a third-party platform. We will use your personal information in accordance with the agreement between us and the third party, the legality of the source, and in compliance with relevant laws and regulations.

### **(5) Rules for the use of your personal information**

We use the personal information collected in accordance with the terms of this Privacy Policy and for the purpose of implementing our products and/or services. **Please note that all personal information you provide when using our products and/or services, or personally sensitive information collected with your consent, will be continuously used by us during your use of our products and/or services unless you delete your account, revoke your consent or reject our collection through system settings. We will stop using and delete this information when you cancel your consent or your account.**

We collect statistics on the use of our products and services and may share this information with the public or third parties to demonstrate the overall usage of our products and services. However, such statistics do not contain identifying information.

We will de-identify any personal information displayed in such manner, including the use of content replacement and anonymity to protect your information.

When we want to use your personal information or collect information for other purposes not specifically covered by this policy, we will ask you for your consent prior to any action.

## 2. How we use cookies and similar technology

When you use our website, we may collect tracking information such as your browser type, operating system, internet service provider, and the web pages you visit on our website. Air China uses a variety of technologies to access such information including cookies and web beacons to enhance the functionality and usability of our website. This is to ensure that our website, products and services better serve your needs. In addition, we use such information to confirm that visitors are eligible to make service requests and to aggregate website activity data.

### (1) Cookie

A cookie is a text-based file that is transmitted by a website to a cookie folder on your computer's hard drive. This allows the site to remember your identity. Typically, a cookie file contains the name of the domain it is in, the "life cycle" of cookie and a unique value that is randomly generated. This website uses two types of cookies, one is a temporary cookie, which is kept in the browser's folder while you are browsing the website; the other is a persistent cookie, which is kept in the browser. Most browsers allow visitors to control whether they accept or reject cookies and notify visitors each time they send a cookie. You can choose to reject cookies by adjusting your browser's settings, but for Air China's site and other large websites that use cookies, this will limit the use of the site's features. For more information on cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### (2) Web Beacon

When a user opens a web page containing a web beacon, the web beacon records the user's basic operation along with cookies. When a user's browser requests information from a website in this way, it can also collect simple information such as the IP address of your computer, the time and content, the browser the user is using, and the cookies previously set by the server. This information is available to any web server you visit. Web beacons do not reveal any "extra" information. They are just a simple way to collect the simplest statistics and manage cookies. Web beacons can be disabled (the same way you disable cookies).

## 3. How we share, transfer, and publicly disclose your personal information

### (1) Sharing

We will not share your personal information with any company, organization or individual other than Air China, unless

1. Sharing with explicit consent: Upon your explicit consent, we will share your personal information with other parties. If required by law, we will inform and obtain your explicit consent before sharing your sensitive information.
2. Sharing under statutory circumstances: We may share your personal information in accordance with laws and regulations, litigation dispute resolution needs, or in accordance with the requirements of administrative and judicial authorities.
3. API/Advanced Passenger Information: An increasing number of countries require incoming airlines to provide passenger information prior to landing. Generally speaking, such laws and regulations require airlines to provide information including passenger identifications and travel documents (passports and visas). Airlines must collect such data before the aircraft takes off. This collection process is increasingly completed through the technology called machine-readable zone (MRZ) used in new travel documents. Such data is collected solely for the purpose of

informing authorities of the destination country, and the airline will not use such data beyond this purpose and will not retain such data after the end of your trip.

4. Sharing with Authorised Partners: For the purposes stated in this Privacy Policy, some of our services will be provided by us and our Authorised Partners. We may share some of your personal information with our partners to provide better customer service and user experience. For example, when you redeem your miles, we must share your personal information with the logistics service provider to arrange delivery or arrange for a partner to provide the service. We will only share your personal information for legitimate, necessary and specific purposes, and will only share the personal information necessary to provide the service. Our partners are not authorised to use shared personal information for other purposes unrelated to the product or service.

Currently, our Authorised Partners include the following types:

(1) Authorised partners in advertising and analytics services: We will not use your personally identifiable information (information that identifies you, such as your name or email address, which can be used to contact you or identify you) to provide advertising and analytics services, unless we have your permission. We provide these partners with information about their advertising coverage and effectiveness, without revealing your personally identifiable information, or we may aggregate such information so that it does not identify you personally. For example, we will only inform the advertisers given that they agree to abide by our advertising guidelines as to how effective their advertisements are, how many people have seen their ads or installed apps after seeing them, or provide the partners with statistics that won't identify our customers (e.g. "male, 25-29 years old, in Beijing") to help them gain a general understanding of audience or customers.

(2) Suppliers, service providers and other partners. We send information to IT vendors, air carriers, land transport operators, frequent flyer program and non-aviation partners who support our business, and other companies involved in providing customer service or fulfilling customer needs including technical support, customer service, payment assistance, mileage accumulation and redemption, merchandise delivery, mail delivery, membership card production and mailing.

5. For the purpose of data analysis, WeChat sharing and payment, positioning and navigation, and accurate push services, our mobile terminal may integrate third-party SDK or other similar applications. The names of these third-party SDK, the purposes and types of personal information collected, and the links to their privacy policies are as follows:

Name	Purpose	Personal information collected	Privacy policy link
Tingyun	data analysis	WLAN MAC, IMEI, device model	<a href="https://www.tingyun.com/legal_declaration.html">https://www.tingyun.com/legal_declaration.html</a>
Tencent	WeChat sharing, payment and data analysis	IMEI, device model GPS positioning, WLAN MAC, base station positioning information	<a href="https://privacy.qq.com/document/priview/bdf936b2477a45ff86da57e3d988bc2b">https://privacy.qq.com/document/priview/bdf936b2477a45ff86da57e3d988bc2b</a>
Gaode	positioning and navigation	GPS positioning, WLAN MAC, base station positioning information	<a href="https://lbs.amap.com/pages/privacy/">https://lbs.amap.com/pages/privacy/</a>
Baidu Statistics	data analysis	WLAN MAC, IMEI, device model	<a href="https://tongji.baidu.com/web/help/article?id=330&amp;type=0">https://tongji.baidu.com/web/help/article?id=330&amp;type=0</a>

Talking Data	data analysis	WLAN MAC, IMEI, device model GPS positioning, base station positioning information, system installed applications	<a href="http://www.talkingdata.com/privacy.jsp?language=zh_cn">http://www.talkingdata.com/privacy.jsp?language=zh_cn</a>
Getui	accurate push	IP address, WLAN MAC, IMEI, device identifier, location information, software list, etc.	<a href="http://docs.getui.com/privacy/">http://docs.getui.com/privacy/</a>

For companies, organizations and individuals with whom we share personal information, we will sign strict confidentiality agreements with them, requiring them to process personal information, including personal sensitive information, in accordance with our instructions, this privacy policy and any other relevant confidentiality and security measures .

(2) Transfer

We will not transfer your personal information to any company, organization or individual except in the following cases:

1. Transfer with explicit consent: After obtaining your explicit consent, we will transfer your personal information to other parties. If required by law, we will notify you and obtain your explicit consent before transferring sensitive information.

2. In the event of a merger, acquisition or bankruptcy liquidation of the service provider, or other circumstances involving mergers, acquisitions or bankruptcy liquidation, if a personal information transfer is involved, we will require the new company or organization holding your personal information to continue to be bound by this Policy, otherwise we will require the company, organization and individual to obtain your consent again.

(3) Public disclosure

We will only publicly disclose your personal information in the following circumstances:

1. We may disclose your personal information publicly, with your explicit consent or based on your active choice;
2. In the case that your personal information must be provided in accordance with the requirements of laws and regulations, mandatory administrative law enforcement or judicial requirements, we may publicly disclose your personal information according to the type of personal information required and the method of disclosure. Subject to laws and regulations, when we receive the above request for disclosure, we will require legal documents, such as subpoenas or investigation letters, to be issued. We firmly believe that the information required to be provided should be as transparent as possible to the extent permitted by law. All requests are carefully reviewed to ensure they exposition is limited to data that is required for law enforcement and only that which is necessary for specific investigation purposes.

(4) Exceptions to requiring prior authorisation of consent, sharing, transfer, and public disclosure of personal information

In the following cases, sharing, transferring, and publicly disclosing your personal information does not require prior authorisation from you:

1. Where the information is relevant to national security and national defence security;
2. Where the information is relevant to public safety, public health and major public interest;
3. Where the information is relevant to criminal investigation, prosecution, trial and execution;
4. When to protect the material and personal rights of another individual and it is difficult to acquire your consent.

5. Where the personal information collected has been disclosed to the public by yourself;
6. Where the personal information is legally and publicly disclosed information, such as news reports, government information disclosures, etc.;

According to the law, the sharing and transfer of personal information that has been de-identified, with the condition that the data recipient cannot recover and re-identity the subject of personal information, do not apply to the sharing, transfer and public disclosure of personal information. Such sharing and transfer do not require additional notice or your consent.

## 4. How we protect and store your personal information

### (1) Our technology and measure to protect your personal information

We value personal information security and will take all appropriate and plausible security control measures to protect your personal information:

1. We have used industry-standard security measures to protect your personal information from unauthorised access, public disclosure, use, modification, damage or loss. We will take all reasonable and practicable steps to protect your personal information. For example, we use transport layer security protocol encryption technology and use a combination of strong cryptographic algorithms (such as ECDSA key agreement, AES256 channel encryption and other technologies) to ensure security during transaction transmission. For the storage of personal information data, industry-standard encryption technology is used to encrypt and store user personal information securely. Our access to stored data is logged and saved by relevant logs, and centralized log collection and integrity monitoring ensures that log files are not tampered with. We also periodically perform internal and external security scans and penetration tests to ensure the safety of the production systems.

2. Certifications: Our core business system has passed the People's Republic of China Information System Level Protection Level 3 certification, and we have obtained ISO27001 certification and PCI DSS certification.

3. We have appointed a Data Protection Officer (DPO) to be responsible for and overlook the data protection and compliance operations within the company. We have also established a data security team to promote and protect personal information security. We regulate the collection, transmission, use and storage of personal information through established information security management systems. We signed the Non-disclosure Agreement with all members, requiring all personnel who may be exposed to personal information to perform their respective confidentiality obligations. Furthermore, we regularly train employees on proper information security and privacy protection measures to enhance employees' awareness of the importance of protecting personal information.

4. The Internet is not an absolutely secure environment, and certain communication methods such as e-mail are not encrypted. We strongly recommend that you do not send personal information using such methods. Please use complex passwords to help us keep your account secure.

5. The Internet environment is not absolutely secure, but we will do our best to ensure the security of any information you send us. If our physical, technical, or administrative protective equipment is destroyed resulting in unauthorised access, public disclosure, alteration, or destruction of information, that result in damage to your legal rights, we will bear the corresponding legal responsibilities.

6. In response to possible risks such as leakage, damage and loss of personal information, we have formulated emergency measures. In the event of classified and categorized leakage of personal information, event reporting and disposal procedures are in place which a dedicated emergency response team. In the unfortunate event of personal information being at risk, we will promptly inform you in accordance with the requirements of laws and regulations: the



current situation, the possible impact of the security incident, the disposal measures we have taken or will take, and how you can prevent and mitigate the risks autonomously, and any possible suggestions, remedies for you, etc. We will promptly inform you of the relevant circumstances of the incident by mail, letter, telephone, push notification, etc. When it is difficult to inform the affected parties individually, we will issue a notice in a reasonable and effective manner. If you find that your personal information has been leaked, please contact our customer service immediately so that we can take appropriate measures.

At the same time, we will also report the disposal of personal information security incidents in accordance with the requirements of the regulatory authorities.

## **(2) Preservation of your personal information.**

We will take all reasonable and practicable steps to ensure that no irrelevant personal information is collected. We will only retain your personal information for the period of time required to achieve the purposes stated in this Policy, unless an extension of the retention period is required or permitted by law. Your personal information will be deleted or anonymised after the retention period.

**If we terminate service or operation, we will notify you at least 30 days in advance and delete or anonymise your personal information after termination of service or operation.**

## **5. Your Rights**

Air China attaches great importance to your personal information and does its utmost to protect your right to access, correct, delete and withdraw your consent to your personal information so that you have full capacity to protect your privacy and security. Your rights include:

### **1. Access and correct your personal information**

In addition to laws and regulations, you have the right to access and correct your personal information at any time, including:

#### **(1) Your account information:**

Website account information: After you log via the option in the upper right corner of the homepage, you can view or modify your personal information under the "Personal Data" section, including: English name, ID type, ID number, gender, birthday, contact person number, zip code, contact person address, and login password. You can also manage, add and delete common passenger information as well as view voucher information and ticket order information. If you need to change your name, you can call the 95583 service hotline to apply for changes.

APP: You can check all the personal information you submitted to Air China in the "Member Portrait" menu on the "Personal Center" page. You can also update your personal information except your username and ID card information. If you need to change your name and ID card information, you can call the 95583 service hotline to apply for changes. You can also add, change, and delete your frequently used information (including passenger name, passenger ID information, itinerary mailing address) at any time by visiting "Common Contacts", "Common Passengers" and "Common Mailing Address" under the "Member Information" menu on the "Personal Center" page.

Member Information: You can log in to the PhoenixMiles website and search for all your personal information through "My Account-Account Management". Through this method, you can also update your personal information (including the card number, name, gender, nationality, birthday, ID number of the member account), change your password as well as add, change or delete your transferee information, contacts, consignee information and more. If

you wish to change your name, gender, nationality, birthday, ID number information, you can call us on the 95583 "Phoenix Friend" telephone service center.

Mileage information: You can check your mileage overview, mileage accumulation, redemption records, etc. on the "My Account – Mileage Bill" on the PhoenixMiles website.

If you find any error in your personal information, you have the right to ask us to make corrections as necessary.

(2) Your order information:

On a PC system, you can view all your completed, pending or for sale orders by logging into your account or by visiting the "View My Orders" page. The specific path is "Home" > "I" > enter the personal center.

Mobile: You can view all of your ticket orders, service orders, store orders or refund history by visiting the "My Orders" page. You can do this on our products/services pages, as well as directly delete information, including order information. You can choose to delete completed orders (and its corresponding order information), but this may prevent us from accurately determining your ticketing information and may make it difficult to provide follow-up services.

(3) Your browsing information:

You can access or clear your search history, view and edit interests, and manage other data. When using a computer, please clear your history through the browser you use.

(4) Please contact us if you need to access or correct other personal information that you may have provided us during the use of our products and / or services. We will respond to your request within the time period set forth in this Privacy Policy.

(5) Personal information that you cannot access and correct: There are some types of personal information that we are unable to provide you with access to for correction purposes. This is to enhance your own user experience and guarantee transactions. Such information includes your device information as collected by security and the personal information you filled out when you booked an additional service. The above information will be used with your authorisation and you will not be able to access and correct it, but you can contact us to delete or de-identify it.

If you are unable to access this personal information via the above methods, you can always send an email to: [dpo@airchina.com](mailto:dpo@airchina.com)

We will respond to your request within 30 days.

## **2. Delete your personal information**

Information that you can directly remove and delete from our product and service pages

In the following situations, you may ask us to delete your personal information:

- (1) If we deal with personal information in violation of laws and regulations;
- (2) If we collect and use your personal information without your consent;
- (3) If our handling of personal information violates the agreement between us;
- (4) If you cancel your Air China account;
- (5) If we terminate the service and operation.

If we decide to respond to your removal request, we will also notify the entity from which we obtained your personal information and request that it be removed in a timely manner, unless otherwise required by laws and regulations, or if these entities obtain your independent authorisation. When you delete information from our services,

we may not immediately delete the corresponding information in the backup system, but will delete it when the backup is updated.

### **3. Change the scope of your authorised consent or withdraw your authorisation**

You can change the scope of your authorisation to allow us to continue collecting personal information or withdraw your authorisation by deleting information, turning off device features, and altering privacy settings on Air China Mobile. You can also withdraw all authorisations to continue collecting your personal information by canceling your account.

Please understand that Air China's businesses require you to provide personal information in order to complete your orders. When you withdraw your consent or authorisation, we will not be able to continue to provide you with products or services. Upon the withdrawal of your consent or authorisation, we will not process your corresponding personal information. However, your decision to withdraw your consent or authorisation will not affect the processing of personal information previously based on your authorisation.

### **4. Cancel the account**

You can apply to cancel your account directly on the PhoenixMiles website or mobile app. After you cancel your account, we will stop providing you with products and / or services and delete your personal information as you request, unless otherwise stipulated by laws and regulations.

You can log in to the PhoenixMiles website and apply to cancel the account via the "My Account/Account Management/Permanent Cancellation Account" page. Your cancellation application will be processed within 30 days.

### **5. If you do not want to accept the promotional information we send you, you can cancel at any time by:**

(1) Please inform us if you wish to not receive promotional information by selecting the corresponding check box found in our forms, or send an email to [dpo@airchina.com](mailto:dpo@airchina.com) at any time thereafter to prevent data processing activities.

(2) You can log into the PhoenixMiles website and change the settings under "Accept promotional emails/SMS" on the "My Account-Account Management" page.

(3) The emails we send you may contain a link to the address of our website. If you do not want to receive the promotional information we sent you again, you can cancel it at any time by clicking the "click to unsubscribe" link below the email.

(4) Through your mobile, select "Home" - "I", click "Settings - Message Push Switch" to set whether to accept promotional information through "Notifications."

(5) We will work with third-party platforms or media ("platforms") to recommend personalized products based on your personal information. Such personal information includes things such as shopping on this website, access to affiliate websites, and hobbies you filled out in your account settings. The platform only provides us with a window to display merchandise, and the link to the window's content is Air China's personalized product display information. However, these windows are maintained by China Air, and we do not provide any personal information to advertisers. If you are unwilling to accept Air China's recommended service on a single platform, please contact the platform to close. You know and understand that the platform is an autonomous entity and that Air China cannot manage it.

**In order to protect your privacy, we will not send you any promotion or product information related to religious beliefs, sexuality, diseases and other sensitive content.**

(7) In response to your requests above

For security reasons, you may be required to provide a written request or otherwise prove your identity. We may ask you to verify your identity before processing your request. We will respond within 30 days. We do not charge a fee

for your reasonable request, but we will charge a certain fee for repeated requests that exceed the reasonable limit. We may reject requests that are unreasonably repetitive, require excessive technical means (for example, to develop new systems or fundamentally change existing practices), pose risks to the legal rights of others, or are very unrealistic.

In the following situations, we will not be able to respond to your request as required by law or regulation:

1. Request directly related to national security and national defense security;
2. Request directly related to public safety, public health, and major public interest
3. Requests directly related to criminal investigation, prosecution, trial and judgment execution;
4. There is sufficient evidence that you have subjective malice or abusing rights;
5. Responding to your request will result in serious damage to the legitimate right and interests of you or other individuals or organizations.
6. Requests involving trade secrets.

## 6. Protection of minors' information

1. Air China considers the protection of personal information of minors to be of great importance and necessity. If you are under the age of 18, you should obtain an explicit consent from your parent or legal guardians before using our products and/or services. Air China protects the personal information of minors in accordance with relevant local laws and regulations.

2. For the collection of personal information of a minor with the consent of the parent or legal guardian, we will only use or publicly disclose such information if it is permitted by law, the parent or guardian expressly agrees, or for the purpose of protecting the minor.

3. If a minor has provided us with personal information without the consent of the parent or guardian, the parent or guardian may send an email to [dpo@airchina.com](mailto:dpo@airchina.com) to remove this information.

## 7. How your personal information is transferred globally

Generally, the personal information we collected is done so and stored within the territory of the People's Republic of China.

Your personal information may be transferred outside of your country for the purposes of supporting your booking, payment, and other services related to our core business. The purpose of processing such personal information is detailed in "1. How we collect and use your personal information" as described in the first clause of this Policy. Additionally, your information may be processed by Air China employees working outside of your country. Our service providers are also involved in the processing of such information. Together with Air China, our service providers provide network reservation engine services, computer reservation system services, online payment management services and email services.

Air China will take all necessary and reasonable measures to ensure that your personal information is always safe. We will transfer your personal information in accordance with all relevant legal requirements. For example, we will seek your consent when necessary to transfer personal information across borders, or implement security measures such as data de-identification prior to cross-border data transfer. The transfer of personal data from EU/EEA to third countries without an adequacy decision by European Commission requires the standard contractual clauses approved by the European Commission, mechanisms such as appropriate privacy protection certificates, or binding company rules.

## 8. How we update this policy

Our Privacy Policy is subject to change.

We will post any changes to this policy on this page.

For significant changes, we also provide more prominent notices (including for certain services, we will send an email notifying the specific changes to the privacy policy).

Significant changes to our Privacy Policy include, but are not limited to, the following:

1. Our service model significantly changes in relation to the purposes of processing personal information, the types of personal information being processed, the ways in which personal information are used, etc.;
2. We have undergone major changes in the ownership structure and organizational structure, including changes of ownership caused by business adjustments, bankruptcy, insolvency, mergers, etc.;
3. If our main objective for personal information sharing, transfer or public disclosure have changed;
4. If there have been significant changes in your rights to participate in the processing of personal information, and how it is exercised;
5. When our department responsible for personal information security, and the contact information and complaint channels change;
6. The personal information security impact assessment report indicates that there is a high risk.

The previous version of our Privacy Policy will be archived for your review.[2018.5](#) [2018.10](#)

## 9. How to Contact Air China

Please contact us if you have any issues regarding our Privacy Policy, including questions on exercising your rights, any enquiries or complaints, opting-out of direct marketing information, or have any questions about the processing of your personal information. Please do so by contacting our Personal Information Protection professional and we will respond to your request within 1 month.

Data Protection Officer

Email: [dpo@airchina.com](mailto:dpo@airchina.com)

Address: Room 4004 (4th Floor) No. 16 Tianzhu West Road, Tianzhu Airport Economic Development Zone, Shunyi District, Beijing, China, 101312

EU Representative

Email: [dpo@airchina.com](mailto:dpo@airchina.com)

Address: 4 Düsseldorfstrasse, 60329, Frankfurt, Germany

If your concerns are not resolved, you have the right to complain to your local authorities, workplace, or local regulatory agency, where you believe a violation occurred.

This Privacy Policy is compiled in Chinese. In the event of any inconsistency or ambiguity between the Chinese version and the translated version, the Chinese version shall prevail.

Latest updated on: 28 JUN 2021