

Privacy Policy

Overview

Air China Limited (hereinafter referred to as "we", "our" and "us") fully understands the importance of personal information protection and will take appropriate security measures in accordance with applicable laws and regulations. We wish to use this Privacy Policy to explain to you how we collect and use your personal information when you use our products and services.

This Privacy Policy will help you understand:

- 1. How do we collect and use your personal information**
- 2. How do we use cookies and similar technologies**
- 3. How do we share your personal information**
- 4. Our legal basis for processing personal information**
- 5. How do we protect and store your personal information**
- 6. Your personal information rights**
- 7. Personal information protection for minors under the age of 14**
- 8. How will your personal information be transferred globally**
- 9. How to update this Privacy Policy**
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Please read and fully understand this Privacy Policy before using our products or services, and confirm you have understood it.

I. How do we collect and use your personal information

We will ask you to provide your personal information voluntarily for the following purposes:

1. For the purpose of performance of your air transport contract with us:

(1) We will provide you with reservation and ticket purchase service

In order to complete your ticket booking, you are required to provide the following information: name, gender, valid identity document information, date of birth, contact number, email address (**necessary for overseas ticket purchase**), name and telephone number. If you book a flight via or from/to a U.S. territory, you will also need to provide residential address information of departure and destination according to local regulatory requirements. To complete the payment, you need to provide the following payment information: bank card number, expiry date, CVV, billing address, cardholder's name, bank reserved mobile phone number, valid identity document information (**note: financial account information is your sensitive personal information**), mileage payment password. After purchasing the ticket, we will generate your order information, including your seat reservation record, ticket number, flight number, departure place, destination, flight time and class.

If you need to mail the itinerary, you need to fill in the recipient's name, telephone number and mailing address.

(2) To provide you with passenger and luggage transport services

When you check in at the airport, we need to check your ticket number and valid identity documents. After confirming your seat number, we will generate a boarding pass. In the event of a payment risk control issue, we will require you to provide the payment card information used at the time of ticket purchase.

To assist you in checking your luggage, we will verify your ticket number and generate your baggage number.

In the event of a flight delay, if you apply for a delay certificate, we will collect your name, ticket number or valid identity document number, flight number and date of your flight.

(3) To help you register and use the Phoenix Miles member service

If you choose to become a Phoenix Miles member, you need to provide your name, contact number, valid identity document information, country/ areas , date of birth, password, we will provide you with " PhoenixMiles " membership card number and membership level. When you use PhoenixMiles member, your mileage accumulation and exchange information will be generated, including your Phoenix Miles E - S hop order record. Your membership level may be changed according to the rules of membership level.

If you are a Phoenix Miles member or a VIP, we will send you a membership card and need to collect your postal address. If you are a minor under the age of 14, your guardian card number should be filled in. In addition, you can voluntarily provide additional information, such as an email address (to receive mileage bills), the option to accept promotional messages, interests, and preferences (seats and meals). To avoid the trouble of entering information, we will directly extract some information from the application form or in the process, including your registration date, registration channel, preferred communication language, membership brand. You can use the mileage to redeem bonus tickets for you and your transferee. At this time, you are required to provide the information required for seat reservation and ticket purchase services. As a supplementary way of membership mileage accumulation, we launched membership number automatic identification for all member initial services, i.e. members use the China civil aviation information group company system to buy air transport flight ticket, if the passenger's name and effective identity document number and its member account registration information, passenger's membership number will be automatically identified, mileage may be automatically credited. If you don't need the automatic identification service, members can log in the member account of PhoenixMiles and turn off the automatic identification of membership through "My Account - Account Management".

You can also use mileage to exchange goods in PhoenixMiles or offline cooperation scenarios. In this case, you need to fill in the name, phone number and postal address of the consignee . You can also fill in the common contact information and common consignee information voluntarily. We will send the contact information of consignee to the mall merchants and logistics service providers. If we cannot contact the consignee, we may provide your contact information to the merchants. In offline cooperation scenarios, when mileage is used to exchange goods, we will send your order information and membership card number to the cooperative service provider. If customer service problems need to be processed by the cooperative service provider, we may provide your contact information to the cooperative service provider.

If you participate in the member's products, activities and use the mileage payment functions (including online and offline), and our business partners to provide the mileage rewards or rights and interests of activities, we will collect and use your name, identity document number, phone number, email address, travel information, membership information, for the purposes of statistics and membership service.

In addition, when you modify your critical personal information, exchange goods, click real-name authentication, you need to confirm whether it is your operation through face authentication, WeChat public security authentication, UnionPay authentication. When you call 95583 for membership service, your name, identity document number and mobile phone number will be used to confirm your membership, so as to ensure the security of your account.

(4) Other services provided to you

If you need to apply for a stretcher, wheelchair, Unaccompanied Minors , Passengers Traveling With Portable Oxygen Concentrators (POCs) or Continuous Positive Airway Pressure (CPAP) Machines , the OPO Staff Transporting Donated Human Organs and other services, you need to fill in your name and contact information , valid identity documents information, contact information and address of relevant fellow traveler , or the one who pick up or drop off the passenger, we will verify your medical certificate, or collect related documents in accordance with the relevant requirements of competent authority .

If you need to purchase our additional services such as prepaid luggage and paid seat selection, you are required to provide your ticket number or valid identification information, flight number and flight date.

Your account information and order information will be used by our telephone customer service and after-sales functions. To ensure the security of your account, our call center customer service and online customer service will verify your identity with your account information. When you need us to provide customer service and after-sales service related to your order information, we will check your order information. To facilitate contact with you, as soon as possible to help you solve problems, or records related to problems of processing scheme and results, we may store your communication with us, communication/phone records and related content (including account information, order information, in order to prove the facts you provide other information, or the contact information you left). We will use your account information and order information if you consult, complain or provide suggestions for specific orders. You may provide other information other than the above information when communicating with our customer service personnel, such as when you ask us to change the delivery address, contact person or contact number.

If you are unable to travel due to illness, we will require you to provide a medical certificate for verification.

If you are using our in-flight WIFI service, you will need to fill in your seat number and name. WIFI usage information may be generated when you use WIFI on the computer, including network device identification information (such as nickname and profile picture), personal commonly used device information, and personal Internet browsing history.

If you are an employee of our enterprise customers (enterprises, government customers, etc.) or an employee of "C ommercial Travel Platform" who has signed and registered a ticket, we will keep the exclusive agreement code information of the major customer in your reservation record to ensure that the ticket you purchased is the exclusive price stipulated in the agreement. The Universal Air Travel Plan (UATP) account information designated by your employer will be kept in the reservation information; When you (or your employer's contact person) apply for the exclusive service of big customers, we may require you (or your employer's contact person) to provide your employer's name, position, enterprise email, number, contact information, valid certificate information, date of birth and other personal information; Your company contact may contact us, we will invite your company contact to register our "C ommercial Travel Platform" customer management platform, input "C ommercial Travel Platform" customer information and contact information (name, mobile phone number and email, login name and password), after successful registration, The account administrator of your company will manage the booking list and booking information of employees of your company through "C ommercial Travel Platform" . During your use of the Service, the above information is uploaded to Air China through the account administrator of your employer and continues to authorize us to use it. At the same time, in order to facilitate the management needs of your employer, the account administrator of your employer has the right to access the above information or register you as a Member of PhoenixMiles member . If you need to cancel your personal account or apply for deleting the above personal data, please contact the account administrator of your employer.

If you have any questions about this, please contact your employer's contact person first to lodge your appeal.

(5) Necessary to ensure the security of transactions

To improve your use of our products and/or service security of the system, and more accurate to prevent fishing website fraud and protect the security of the account, we may be through understanding your browsing information, order information, equipment information (IP address, type of equipment and equipment identification number) to determine your account security/transaction security risks, to prevent fraud.

2. When obtaining your consent

To enhance your service experience and improve our products and services, we will ask you to voluntarily consent to our collection and use of your information.

Our APP will invite you to open specific mobile permissions to provide better service experience or improve our products or services. For specific mobile permissions, please see our system mobile permissions list in APP Personal Center - Settings - Privacy.

We will invite you to reserve your email address to send orders and flight information, or subscribe to our promotional information, including special offers and discounts for specific routes, products or services, etc., and your initiative to fill in the action will be regarded as consent. We may also hold some promotional activities, and we need to collect your name and contact information to complete these promotional activities.

When you agree to use face recognition, we provide you with lounge access, real name authentication and other services. **On the face recognition function itself, we may collect your face image, face recognition characteristic value, valid identity information, PhoenixMiles member card number.** You can turn on or off the face recognition function to achieve your own control.

If you are an employee of our enterprise customers (enterprises, government customers, etc.), you can carry out the enterprise customer identity authentication and choose the service. You can voluntarily choose to agree to the authentication or cancel the authentication.

Please ensure that you are fully authorized by the nature persons when providing their personal information and sensitive information when using the above functions. Please ensure that your operation does not violate the legal rights or interests of any third party, and confirm that the third party can follow the privacy policy to process personal information. If an individual requests to delete or correct the relevant information, you need to delete or correct the above information in a timely manner, otherwise you may bear the legal consequences arising therefrom. If we change the purpose of using information of an individual due to business needs, we will inform you in time. Please decide whether the above information can continue to be processed according to the authorization of the third party.

In addition, when you follow our WeChat official account, Weibo official account and other social media platforms, your active following behavior will be regarded as valid consent, and you can identify the specific follower's information and time of following, but we will only use it to interact with you on the platform. You can withdraw your consent at any time by unfollowing.

3. To comply with legal obligations

In order to comply with applicable laws and regulations, we will ask you to provide your real name and valid ID information if required by applicable civil aviation laws and regulations. We will collect and store your log information to fulfill our classified protection obligation of cybersecurity under the Cybersecurity Law of China.

In addition, we may collect and use your personal information in accordance with the law to protect your life, health and property rights due to public health emergencies, such as requiring you to check your previous travel, taking your temperature or requiring you to provide a specific health certificate.

Collect your personal information through a third party

We may receive your personal information from third parties from time to time. These third parties include our affiliates and business partners. We use this information collected from third parties to provide you with services under relevant contracts and to ensure the accuracy of the records we hold about you.

In addition, please note that third parties may have their own special privacy policies to explain how they collect and process your personal information. Such privacy policies do not constitute a part of this Privacy Policy. You need to carefully read and decide whether agree with their privacy policies or not .

II、 How do we use cookies and similar technologies

When you use our website, we may collect tracking information including your browser type, operating system type, name of Internet service provider and pages you visit on our website, etc. We use a variety of technologies to obtain this information, including Cookies and Web beacons, to enhance the functionality and ease of use of our

websites, products and services to better meet your needs. In addition, we use this information to determine whether visitors are qualified to request services and to aggregate site activity data.

Please refer to our Cookie Statement for details on how we use Cookies and similar technologies.

III. How do we share your personal information

1. Our service providers and our affiliates

We will allow our third party service providers (including agents, contractors and affiliated companies) to use your Personal Information on our behalf for the purposes set forth in this Privacy Policy. For example: staff who assist you with check-in and boarding, our system service providers. We may also disclose your personal information to third parties to make it easier for them to implement any special arrangements you may require, such as wheelchair services.

2. Third parties such as airlines, hotel partners, tour operators, online travel agencies (OTA), insurance institutions, banks and financial institutions

To facilitate and manage your travel arrangements and provide you with products or services you need, we may share your personal information with third parties, such as other airlines (including [Star Alliance partner airlines](#), other partners and cooperative code-sharing airlines), hotel partners, Land or sea transport operators, partner insurance or banking financial institutions, and travel agents or other personnel who interact with us on your behalf. Your personal information will be used by such third parties in accordance with their privacy policies. The privacy policies of our intermodal, syndicated and code-sharing partner airlines are available in the [International Air Transport Association \("IATA"\) Privacy Policy database](#).

3. Partner of Phoenix Miles Membership Program

We may share your information with airlines who jointly use PhoenixMiles Membership program and the cooperation partners of PhoenixMiles to facilitate you to enjoy our PhoenixMiles membership products and services, such as your mileage accumulation and exchange, lounge access, etc.

4. Our enterprise customers (enterprises, government customers, etc.)

We will disclose your travel details and information about your use of our services to our major customers, employees of our **enterprise** customers, or those who travel or obtain products or services paid for by our **enterprise** customers.

5. Government, regulatory agencies or organisations required by laws

We may disclose your personal information to the government, regulatory authorities and legally required entities, such as immigration authorities, Customs and border defense authorities, Civil Aviation Administration and airport authorities, dispute settlement authorities, procurator authorities and law enforcement authorities, such as: The laws of the United States and other countries require us to disclose personal information (Passenger Name Record (PNR) and/or Forecast Passenger Information (API)) about your travel documents, booking details and flight schedules as required by law. We will disclose your personal information to these institutions so that we can provide you with products and services under the law and regulation.

6. Our SDK provider. Details are as follows :

The name of the SDK	purpose	Collect information of personal Information	Privacy Policy Link
Tingyun	The data analysis	WLAN MAC, IMEI, and device model	https://www.tingyun.com/legal_declaration.html
Tencent	WeChat share	IMEI, device model,	https://privacy.qq.com/document/priview/bdf936b2477a45ff86da57e3d988bc2b

	WeChat pay The data analysis	GPS location, WLANMAC, base station location information	
A map	Navigation and positioning	GPS location, WLANMAC, base station location information	https://lbs.amap.com/pages/privacy/
Baidu statistics	The data analysis	WLANMAC, IMEI, device model	https://tongji.baidu.com/web/help/article?Id = 330 & type = 0
Talking Data	The data analysis	WLANMAC, IMEI and device model, GPS location, base station location, system installation applications	http://www.talkingdata.com/privacy.jsp?LanguageType = zh_cn
Getui	Accurate delivery	IP address, WLANMAC, IMEI, device IDENTIFIER, location, and software list	http://docs.getui.com/privacy/
Google analytics	The data analysis	Advertising identifier, IP address, device model, geographic location, IDFA	https://support.google.com/analytics/answer/6004245

7. Other circumstances in which we disclose your information to designated third parties with your consent or upon your own initiative.

IV、 Our legal basis for processing your personal Information

We will not process your personal information without any legal basis. Generally speaking, the legal basis for us to process your personal information would be as followings :

- Performance of the contract between you and us , such as general terms of transportation, service agreement for specific products and PhoenixMiles Member's Guide
- Comply with our legal obligations, such as real-name obligations or other information reporting obligations stipulated by civil aviation laws and regulations, our classified protection obligation of cybersecurity under the Cybersecurity Law of China and user information security obligations
- Obtain your consent, such as when you turn on the face recognition function switch, or you allow us to send promotional messages to you
- In order to deal with public health emergencies, or to protect the life, health and property safety of you or other natural persons, for example, we will ask you to measure the temperature at the boarding gate and record passengers whose temperature is abnormal and report to the competent authorities for follow-up treatment.
- Within the territory of the EU and / or EEA , for our legitimate interest , including managing your personal information in our IT systems , to improve our products and services, holding on Phoenix Miles Membership activities, to participate in our social activities, for the transaction security to prevent fraud and network information security.

V、How do we protect and store your personal information

(I) Our technology and measures 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 store your personal information for the shortest period necessary to achieve the purpose stated in this Privacy Policy, except for where applicable laws and regulations require, such as the E-commerce Law of China requires us to store your transaction order information for no less than three years. After you cancel your account, we will also delete or anonymize your personal information. When your personal information storage exceeds the minimum period required for the above purposes, we will delete or anonymize your personal information.

VI、 Your personal information rights

We protect your personal information rights in accordance with the applicable laws, including:

1. Inquire, copy, and portably transfer your personal information

Unless otherwise provided by law or we have specific confidentiality obligations, you have the right to access your personal information at any time by:

(1) Your Account information:

Account information: You can view or modify personal information in Profile after logging in a user in the upper right corner of the homepage. APP: You can click the "profile picture" menu on the page of "Personal Center" to check all the personal information you submitted to us. Account information of "Commercial Travel Platform": You can log in to "Commercial Travel Platform" system and check your personal information in "Profile". If you need to modify your personal information, please contact the system administrator of your enterprise to modify it.

Member information: You can log in "Phoenix Miles" website, through "my Account - Account management" and "mileage bill" to access your membership information and mileage information.

(2) Your order information:

On the PC side, you can access all your completed, pending payment, or pending sale orders by logging into your account or visiting the "View My Order" page. In the mobile APP, you can access your order records by visiting the "home page" - "Personal Center" page. The specific path is: "Home" - "Personal Center" - "All Orders". In the "Commercial Travel Platform" system, you can access all your completed, pending payment or pending sale orders by logging into your account and visiting the "Ticket Order" page.

(3) Your browsing information:

You can access or clear your search history, access and modify interests, and manage other data. PC: Clear your history through your browser.

(4) If you need to inquire or copy any other personal information generated during the use of our products and/or services, please feel free to contact us by dialing 95583 or email dpo@airchina.com.

In addition, you have the right to request that we provide you with a copy of your personal information processed by us and, subject to legal or regulatory requirements, you also have the right to request that we transfer your personal information to other personal information processors designated by you.

2. Correct or update your personal information

If you find that our processing of your personal information is inaccurate and affects the realization of your rights and interests, you have the right to request us to correct or update your personal information at any time. You can further apply for correction on the personal information query page or through the channels above. If you still have questions, or if it is difficult to correct, you can call 95583 or submit a correction or supplementary application to us at dpo@airchina.com.

3. Delete your personal information

You have the right to request us to delete your personal information from our information systems as permitted by law, information that you may remove or delete from our products and/or services pages, and by calling 95583 or making your request to dpo@airchina.com, except where we are required by law to continue to store your personal information for a specific period.

In addition, for technical reasons, when you delete information, we may not delete the corresponding information in our own system immediately, but will delete the information when backup update, during which time we will only store and take security measures.

4. Change the scope of your consent or withdraw your consent

For personal information obtained by us based on your consent, you have the right to change the scope of your consent or withdraw your consent by disabling device functions, setting privacy Settings, canceling corporate customer identity authentication, or canceling your account.

Please understand that after you withdraw your consent, we will no longer process the personal information obtained based on your consent, which will affect the products or services provided to you corresponding to this part of personal information. However, your decision to withdraw your consent or authorization will not affect the prior processing of personal information based on your consent before.

5. Cancel your account

You can directly apply for canceling your account on the Phoenix Miles website or mobile APP. After you cancel your account, we will stop providing products and/or services to you and, upon your request, we will delete your personal information unless otherwise provided by laws and regulations.

You can log in "Phoenix Miles" website and apply for canceling your account in "My Account/Account Management/Permanent Cancellation". Your application for canceling your account will be processed within 30 days.

If you are not a member of Phoenix Miles, but have registered our official website account, you can cancel your official website account by dialing 95583 or contacting dpo@airchina.com.

6. Refuse us to send you promotional information:

You have the right to unsubscribe from the promotional information we send you at any time in the following ways:

(1) Please object to such promotional information by selecting the appropriate selection box in the form or sending us an email at dpo@airchina.com at any time thereafter when we collect data.

(2) You can log in to the "Phoenix Miles" website and set "Whether to accept promotional emails/SMS" on the page of "My Account-Account Management".

(3) Any email we send you may contain promotional information. You may cancel it at any time by clicking the "Unsubscribe" link at the bottom of the email. However, you should note that your service information cannot be unsubscribed.

(4) You can click on the "Home page" - "Personal Center" of the APP to enter the "Basic Information" page to enable or disable whether to receive promotional information pushed to you.

(5) You may unfollow or unsubscribe our WeChat official account, Weibo and other official social platform accounts at any time.

(6) You can cancel the authentication of enterprise customer employees on our APP at any time.

(7) You can choose to cancel our account.

7. Restrict or object to process your personal information

You have the right to restrict our processing of your personal information under certain circumstances, and the right to object us to use your personal information for automated decision-making, profiling, or the right to object us to process your publicly available personal information, or to opt-out the share of your personal information with third parties if required by applicable law.

You can request to exercise this rights by sending an email to dpo@airchina.com. Please note that once you exercise these rights, we will stop processing your personal information and wait for your further requests, such as correcting or deleting your information.

8. Right to explain this Privacy Policy

When you have any questions about the rules governing the processing of personal information contained in this Privacy Policy, or about the processing of your Personal Information, or you require us to provide specific information in accordance with applicable law, you may request an explanation by sending an email to dpo@airchina.com.

9. Exercise of these rights

To protect the security of your personal information, we may require you to provide a written request or verify your identity, after which we will respond to your request for rights within a reasonable period permitted by law. Your request will be confirmed or responded within 10 working days. In addition, if you exercise your rights on behalf of others, or if you, as a close relative of a deceased of our passenger, request us to access, copy, correct or delete the information related to the deceased, please provide proof of your identity and the other person's identity, as well as proof of the relationship, such as special power of attorney or death certificate of the deceased.

You have the right to file a complaint or legal action with the regulatory authority or court of your residence or the place where the action takes place for the exercise of the above rights or our response.

VII. Personal Information protection of minors under the age of 14

We protect the personal information of minors in accordance with applicable laws and regulations. If you are a minor member of PhoenixMiles under the age of 14, you need to bind the account of your legal guardian when using our products or services. If you are not a member but a minor passenger under the age of 14, you must obtain the consent of your legal guardian before using our products and services.

In addition, we will only deal with minors under the age of 14 within the scope of products and services needed to purchase a minimum of information and to ensure that the appropriate security measures, not to profile or sent to the sales promotion information, or use their personal information induced the activities which are incompatible with their age and responsibility. To protect the information security of minors' accounts, face recognition will be enabled for children when the account information is modified with the consent of the legal guardian, but children's face recognition information will not be stored.

If a minor has provided us with personal information without the consent of their parent or guardian, their parent or guardian may send an email to dpo@airchina.com to delete such information.

VIII. How will your personal information be transmitted globally

Personal information collected and generated by us in China will be stored in the territory of China.

For the purposes set out in this Privacy Policy, your personal information may be transferred to countries or areas other than your residence. At this time, we will protect the security of your personal information in accordance with applicable laws and regulations and transfer your personal information worldwide, including but not limited to:

1. Before transferring your personal information outside of China based on your consent, we will fully inform you of cross-border transfers and request your explicit consent in accordance with the applicable laws.

2. If your personal information is transferred outside of China, we will carry out risk assessment and/or personal information protection impact assessment in accordance with the law and regulatory requirements or sign standard contractual clauses released by the Cyberspace Administration of China.

3. If your personal information is transferred outside of EU to a country where the EU Commission has not made a sufficient decision, we will sign the standard contractual clauses approved by the EU Commission and take security measures to protect your personal information.

IX、 How to update this policy

This Privacy Policy will be changed to adapt to the law, technological and practice changes.

However, we will not reduce your rights under this Privacy Policy without your express consent. We will post any changes to this Privacy Policy on this page. For major changes involving your rights, we will also provide more significant notifications, such as in-APP notification or email notification.

We will also archive older versions of this Privacy Policy ([2018.5](#) [2018.10](#) [2019.06](#) [2020.06](#) [2021.06](#)) for your review.

X、 How to contact us

If you want to know more information about this privacy policy, including exercising your rights, complaints, or the rules of the processing of your personal information, if you have any questions, you can contact our data protection officer, or EU regional representative, we will respond to your request within the time frame required by laws:

Data Protection Officer

Email : 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

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.

Latest updated on:

If there is a separate privacy policy or special provisions related to personal information protection in a certain product or service provided by us, this Privacy Policy of the product will be preferentially applied. Contents not covered by the Privacy Policy and terms and conditions of the product shall be subject to this Privacy Policy.

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.