Air New Zealand Privacy statement

'Think privacy & do the right thing'

We have built this privacy centre to help you understand how we handle your personal information when you interact with us. Here you can find out all you need to know about the personal information we <u>collect</u>, <u>use</u> and <u>share</u> about you. You can also find out about the rights and <u>controls</u> you have over the information you've entrusted to us, and about the obligations we have to <u>protect</u> it. We'll make it easy for you to <u>engage</u> with us when you need to.

As an international airline, we need to collect personal information about our customers. We need to use and share this information to offer the best possible air travel experience and to keep our customers and employees, safe and secure. We also need to protect the personal information you entrust us with.

Air New Zealand plays a pivotal role in supercharging New Zealand's success environmentally, socially and economically. That's a responsibility that we take very seriously. We can only fulfil this role with the **trust** of our customers, employees, shareholders, business partners and communities.

The way we handle your personal information is crucial to earning and maintaining this trust.

We know that you will only entrust us with this information if you believe that we'll 'think privacy & do the right thing'. That's our privacy commitment to you. We believe customers should be at the core of everything we do and engaging in good privacy behaviours helps us to remember that. Our privacy commitment applies no matter where in the world you use our products and services.

Throughout the privacy centre, you can <u>ask us</u> to get more information, raise your concerns, make a request or provide feedback. You can also check our <u>FAQs</u>.

Trust

Thanks for trusting us with your personal information. Here's what we do with it.

Control

Here you can find out what personal information we hold about you. You can also control what we do with it.

Engage

If you have any concerns or questions, here's how you get in touch with us or check our FAQs.

Air New Zealand is recognised as the organisation responsible for the collection and use of personal information in the context of providing the products and services we have outlined throughout the privacy centre.

We have provided some translations in languages other than English. If there is any uncertainty between the English version and these translations, you should refer to the English version.

We will update the content on this privacy centre if there are relevant changes in law or in our business operations. Check back from time to time.

When you interact with us or visit and use our online and mobile applications, you are accepting the practices for handling your personal information that we describe here. The information contained throughout this section equates to the Air New Zealand privacy statement.

Air New Zealand privacy requirements

It's a big job protecting the privacy of your personal information. We have outlined five clear privacy requirements that apply to customers who are anywhere in the world and who use our products or services.

These privacy requirements reflect our business principles that you can find in our Code of Conduct. They guide our efforts to 'think privacy & do the right thing'.

1. Operate safely, responsibly and reliably

- We have assigned roles, responsibility and accountability for privacy management across the business from our leadership team down
- We have a global privacy office which engages with our employees and partners to design products and services that address and respect privacy impacts

2. Act with integrity, honesty and transparency

- We are open about our reasons for collecting, using and sharing personal information and we ensure they meet legal and legitimate business requirements
- We communicate openly and clearly through our privacy centre (and other channels) explaining how we collect personal information and who we need to share it with
- We provide customers a way to access and update the personal information they share with us and we aim to maintain the quality of information we handle

3. Protect our people, property and information

- We believe that personal information that is private should remain private and we regularly remind employees how to protect it
- We work with our security team and partners to protect the personal information we are responsible for

• We will keep personal information only for as long as needed to meet legitimate customer and business needs

4. Treat people fairly and with respect

- We only collect the personal information we need and if we need to use or share it for new reasons we will try our best to let customers know
- Where it is feasible, we give customers control over the personal information they share with us and their preferences
- We seek to provide our customers with personalised offerings that are relevant and helpful
- We welcome feedback on the way we handle personal information

5. Comply with the law

- We respect and comply with core global privacy values
- We keep an eye on changes in the law globally that may impact privacy and if necessary we will update our approach to privacy

Trust

Find out how we collect, use, share and protect your information.

If you can't find what you're looking for ask us.

- How we collect your info
- How we use your info
- How we share your info
- How we protect your info

How we collect your info

As an international airline, we need to collect personal information about our customers and passengers. Here we explain how we collect personal information and what types of personal information we collect about you.

If you can't find what you're looking for ask us.

We need to interact across our business and with external third parties to collect your information and provide you with the travel experience, products and services you request. This may include interactions about bookings, shopping, parking and other transactions, communications and marketing, programmes and membership services, employment applications, competitions, promotions and surveys, visiting our websites and using our apps.

How we collect your information will differ depending on the circumstances when we interact with you and the services or products you request.

We may collect your information through trusted parties, such as travel agents, corporate travel arrangers, financial, business and retail partner programmes, other airlines and alliances, call centres, freight companies, airport and aviation security and management, other airlines, marketing and analytical services, competitions, promotions and survey providers, and regulatory authorities such as immigration, customs and border security services.

We may also collect your information that is publicly available, for example through social media or public directories.

On the ground

While we love to transport you around the world in comfort and style, a lot of our work must be done on the ground. As part of this, we need to collect personal information about you. This could include information you provide us directly or information collected that you have provided to other sources:

- Booking information we collect the personal information you provide about your flight or freight bookings or requests for other travel related services, including your name, gender, contact details, date of birth, nationality, passport details, credit card details, bank account details, special meal or assistance requests, frequent flyer details, flight details, flight preferences and information about other people you are travelling with and unaccompanied minors
- Check-in information when you check in extra baggage or over-sized baggage we
 need to collect contact and baggage details. We may collect your coffee preference
 to enable you to order coffee when you check in at an Air New Zealand Lounge. If
 you are using our automated airport baggage drop we may collect a biometric
 image to match your bag to your passport
- CCTV where you see signs at any of Air New Zealand's physical locations (in airports or elsewhere) telling you that CCTV cameras are in operation, we are collecting CCTV footage of our employees and customers
- **Call recording** when you call any of our customer service lines, either in New Zealand or overseas, we may record the call
- **Parking information** if you are using the car valet parking, we'll need to collect contact, travel and vehicle details
- Shopping directly when you shop directly at our Airpoints™ Store we'll collect your purchase details, including your name, contact details, credit card details as well as details of delivery of items purchased. When you shop directly through our Airpoints Mall, we'll collect your purchase amount, including your name and contact details
- **Shopping indirectly** if you are shopping indirectly such as booking rental cars, hotels, campervans, travel insurance, activities or other services provided by third parties which we act as sales agent for, we will collect your name, address, contact phone number and email, credit card details, and if relevant, your travel details (such as flight number)
- Compliments, complaints or concerns we collect information about your interactions with our ground crew, including any compliments, complaints or concerns raised or any incidents which involve you or those you are travelling with
- Business, corporate and government travel programmes if you are travelling
 under one of our business, corporate or government travel programmes, we will
 also collect your traveller profile details relevant to employment travel, which may
 include travel arranger details, business contact and cost centre details, your
 preferences for hotels, rental car and other related products or services and any
 additional travel related information you provide

Please note that if you make bookings or request other services for other people, such as your family, friends or employees, you must ensure that you are authorised to provide us with their personal information or amend it and that they know about this privacy statement. We will proceed on the basis that you have obtained their authorisation.

If you choose not to provide us with any personal information we require from you, we may not be able to provide you with the products or services you have requested.

When you fly with us, we may collect the following personal information about you in addition to what we collected on the ground:

- Information about your use of the inflight entertainment system, including your food and drink orders, inflight purchases, inflight entertainment setting preferences, audio and audio-visual preferences and playlists, Airpoints transactions and Airpoints or Koru membership
- Your survey answers, if you choose to complete a survey using the inflight entertainment system
- Information about your interactions with our air crew, including any compliments, complaints or concerns raised or any incidents which involve you or those you are travelling with

This information is important to us because it helps us understand how you used our products and services and how you found your overall experience in the air.

Please note that we do not collect or retain any information about your use of our seat chat facility.

Sensitive personal information

In some countries, sensitive personal information is managed differently to other personal information. Sometimes we must disclose sensitive personal information to provide services to our customers (passport details for example contain sensitive personal information such as your biometric facial image and your credit card transactions contain financial information). Sensitive information includes personal information about the following:

- Physical or mental health
- Biometric information
- Religious beliefs
- Race
- Financial (payments)
- Criminal history

We may collect sensitive information **from you directly** (or via a reservation agent or other airline in a code share situation), for example where you tell us about your dietary requirements (which might be based upon a particular religious belief or health condition) or other health conditions that may impact on your flight or the services you require.

We may also collect sensitive information **from other airlines** and agencies, particularly where this information relates to disruptive behaviour or any issues that may impact on customer or employee safety or security.

Wherever we've collected it, we will treat sensitive information carefully.

Loyalty programmes & membership services

Our Airpoints and Airpoints for Business loyalty programmes offer members the opportunity to earn Airpoints Dollars™ and Status Points across an expansive network of

airline, financial, business and retail partners. Members of these, Koru and other programmes benefit from being able to spend Airpoints Dollars on a wide range of products and services that the programmes offer.

We want you to understand the way we <u>collect</u>, <u>use</u> and <u>share</u> your personal information as part of these programmes. It's also important that you read the privacy statements our <u>Airpoints partners</u> provide to you, as these will explain what personal information they intend to share with us. For information about what personal information we share with our partners, see the <u>sharing</u> section here in the privacy centre. You should also refer to relevant terms and conditions for the various programmes, such as <u>Koru</u> or <u>Airpoints</u> terms and conditions.

The personal information we collect from you directly includes the following:

- Information you provide on your Airpoints application form and when joining Airpoints for Business
- Your Airpoints number and your online Air New Zealand account password
- Information you provide on your Koru membership application form, if you have one
- Your travel history with Air New Zealand, Star Alliance and other airline partners
- Information about any giftees you may register on your Gifting Register
- Information about the parties you include in your Shairpoints™
- Information you have provided as part of creating a "traveller profile", if you choose to complete
- Information about your social media activity, either from you directly or from third parties where your information is publicly or commercially available

Third parties

We may also collect personal information about you **from third parties**, either with your consent or where permitted by law, including:

- Your balance, transaction and purchase history at retail and online stores with our Airpoints partners (where you use your Airpoints membership or earn Airpoints Dollars and Status Points)
- Other personal information that our Airpoints partners choose to provide to us in order to assist in identifying suitable offers and promotions from us and our partners you might be interested in
- Personal information that is publicly available
- Information about your identity, from our Airpoints partners and other third parties, in order to verify your identity and contact details
- If you apply for or are an Airpoints credit card holder, OneSmart™ or Travelcard holder, information from the financial service providers offering these products about your application, membership and use of these products, including balance, transaction and purchase history information
- Information from other airlines, to enable travel and particularly where this
 information relates to disruptive behavior or any issues that may impact on
 customer, passenger or employee safety and security

Travel requires that we may collect information about you from regulatory, law
enforcement and other authorities, including trusted third party providers of
information assurance services who we have entered agreements with, Aviation,
Immigration, Border Security, Customs, Police and other agencies. The information
collected may include your contact and flight details such as destination and origin
of travel and visa permissions or safety and security issues

If you choose not to provide us with the personal information required to provide these services, we may not be able to provide you with the services you have requested or process your programme application.

Minors & unaccompanied minors

We don't intentionally collect information from minors (under the age of 18) and we can't identify if minors use our products or services, visit our websites and do not tell us their age.

If a minor is an Airpoints or Shairpoints member (under the age of 16) we collect personal information that has been provided with parental or guardian consent as part of the programme application. In addition, we collect information for Airpoints Dollars balance.

We collect personal information for an <u>unaccompanied minor</u> (aged 5 to 11 not traveling with an adult 15 years or over) when their personal information has been provided with parental or guardian consent. This includes name, age, gender, special instructions you provide, flight details and contact details as well as details of ground and flight staff assisting with travel. We also collect personal information about those who have been identified in the unaccompanied minors form as responsible for dropping off or collecting the unaccompanied minor. The information collected includes name, relationship to unaccompanied minor, address, contact number and declaration of the parent/guardian.

We use this personal information to enable the secure and safe travel of unaccompanied minors during their travel with us. We share this personal information with our airport employees (Air New Zealand employed and those of our ground handling agents offshore) and flight crew for the purpose of ensuring safe chain of custody throughout the unaccompanied minor's journey with us. We also maintain the unaccompanied minor's information post journey so that we may recognise those who fly regularly with appropriate discounts rewards.

Online & mobile applications

If you register via our website for an Air New Zealand online account, we will collect your:

- Name and contact details
- Password security question and answer
- Travel preferences
- Information about contacts for children travelling alone (if applicable)
- Other frequent flyer programme details if you choose to share these with us

Your online account enables you to manage your communication options, so we collect information about whether or not you want to receive email from us about special offers

and the types of services and products you would like to hear about, such as Airpoints or partner programmes.

We will also collect your business title and company, your passport details and your gender, should you choose to provide these in your "traveller profile". We also collect information about travel alerts, how and when you would like to receive these.

If you download our mobile application we will enable all of the information collected in your online account to be accessed via the mobile application.

The way you use our website and follow the links we provide tells us a lot about how well we're communicating with our customers. So, like many businesses, we use cookies and other technology to allow us to improve site performance and enhance your online experience.

If you visit one of our websites or use one of our mobile applications (like Air NZ mobile app, OneSmart app, KiaOra app or grabaseat™ app), we and third parties may use cookies and other online tracking technologies to collect personal information about you from your browser history on your computer, mobile or device.

You can always restrict the cookies on your device to limit the information we can collect about your website or application use. However, be aware that this may reduce the functionality of the website and impact on the processing your personal information to provide the services you want (such as bookings).

Sometimes we suggest links to third party websites that we think you might be interested in. We have no control over the way these websites collect personal information, so make sure you read their privacy statements before sharing your information.

We have a <u>cookie policy</u> that explains the information we collect and why. It also explains what cookies are and how you can enable or disable them. The information we collect may from cookies stored on your web browser, include:

- Your domain name and your IP address
- Your online Air New Zealand account password information
- Your internet browser software, history and type of computer or mobile device used
- Your operating system and platform
- Your device geo-locator information (if you have downloaded our mobile application) so we can provide you with flight arrival and travel information
- Your preferred webpage layout and language preferences
- The path you took to get to our websites

In addition to cookies we also use other technologies to track other information including:

 Information about your online activity on our websites, such as web pages viewed, paths you used through our websites, options you selected and the search terms you used

- The bookings you made on our websites and the bookings you abandoned, including the information you entered when you made or started to make a booking
- Your search behaviours on our site such as destination and origin
- Information about your online activity, browsing preferences and other online purchases with Air New Zealand and our partners

Please note that none of our mobile applications will access your location, contacts or your camera without your permission. You will be prompted when installing the relevant mobile application to review and provide the required permissions. Our applications will only ever seek to access your personal information where necessary.

Promotions, competitions & surveys

We like to talk to our customers, especially when we've got great ideas and deals to share. Sometimes we just want to know what you think because that helps us to improve the products and services we offer. We also like to give our customers the chance to earn other rewards or win prizes that will make their experience with us even more positive.

When we run promotions, competitions or surveys we collect personal information from you. Sometimes this is collected through selected third parties helping us run these events. We might need to share updates with you about these events, so we'll send prompts using the information you provide. Don't forget to check them!

If you enter other people - your family, friends or employees - into competitions, surveys or promotions please ensure they have given you their consent to provide us with their personal information and that they know about this privacy statement.

Applicants & candidates

Our people, **Air New Zealanders** drive us to be among the world's best, in all aspects of our operations. This means we want to recruit the best people, from all over the world to represent us and be the face of Air New Zealand wherever we are.

To make sure our applicants are 'the right fit', we ask them to provide us with information about their background including their work and education, their health or disabilities that may impact on their work, their skills, qualifications, talents and interests, their experience and their reasons for wanting to work with us. Throughout the application process we need accurate and up to date contact details. We may conduct re-hire checks, to determine if people have previously worked with us.

When you apply for a role with Air New Zealand, we collect some personal information directly from you, including some sensitive personal information should you choose to provide it. We may also ask you to consent to us collecting personal and sensitive personal information from third parties, including:

- People or agencies you have nominated to provide you with a reference (please note that we will only contact the person you have nominated and will let you know if they are not available)
- Our third party recruitment services providers such as initial assessment and interview information

- The Ministry of Justice or similar bodies if you are an international applicant of have lived overseas (to check if you have a criminal history)
- Aviation security specialists such as the Civil Aviation Authority in New Zealand or other similar bodies if you are applying for international roles outside of New Zealand
- Reliable vetting agencies who conduct pre-employment background checks
- Credit reporting agencies (where your role involves significant financial risk)
- Health professionals to conduct and or obtain medical information relevant to positions being applied for
- Education or other professional agencies to check qualifications
- Google and social networking sites where information is publicly available and permitted

If you don't provide us with the personal or sensitive personal information we request, or you do not wish to consent to reasonable vetting requests, your application may not be processed.

How we use your info

As an international airline, we use the personal information we collect so that we can offer a great travel experience, meet our customers travel needs and provide our services safely and securely. These are **our main purposes** for collecting your personal information. Here we explain in more detail the ways we use your personal information.

If you can't find what you're looking for ask us.

Providing you products & services

We collect personal information about you so that we can provide you with the products and services you've requested from us, safely and effectively.

We may use personal information to:

- Verify your identity and contact details
- Provide the products and services you request, including flight and other related bookings, catering services, ground handling services or special assistance services
- Communicate with you and process your requests
- Enable your access to and support for our website when you use your Air New Zealand online account
- Operate our call centres, customer relations and support
- Offer and administer our competitions, surveys, promotions, marketing, events and travel sales functions
- Provide electronic funds transfer services, credit card account processing and related services
- Respond and manage any enquiries, requests, comments, complaints or incidents raised with us
- Notify you of flight information (including delays or disruptions) and flight reminder alerts
- Enable the secure and safe travel of unaccompanied minors during their travel with us and to their information post journey so that we may recognise those who fly regularly with appropriate discounts rewards
- Manage the safety and security of our customers, employees, aircraft and operations
- Monitor our employees' performance, the quality and testing of our services and systems and to train our employees
- Administer your application and enable your participation in your business, corporate and government programmes
- Support and process your candidate application

Loyalty programmes & membership services

If you're a member of one our <u>loyalty programmes or membership services</u> (including Airpoints members who are minors), we will also use your personal information to:

- Administer your application and participation in our loyalty programmes such as Airpoints and other Air New Zealand loyalty programmes such as Airpoints for Business
- Administer your application and enable your participation in our membership services, such as Koru
- Administer and enable transactions in Airpoints Dollars that you may use on products and services with our retail and Airpoints partners. This may include your Airpoints number, transaction and purchase history such as details about where, when and how frequently you shopped to administer your Airpoints Dollars
- Administer membership and benefits with our trusted airline partners, such as Star Alliance and other airlines. We may use your information to improve services and benefits offered to you and to future relationships between, you, Air New Zealand and our airline partners, including identifying and presenting offers for products, services, marketing, statistical data analysis, market research or promotions
- Administer membership and benefits with our trusted financial partners for OneSmart, Travelcard and our Airpoints credit card holders. We may use your information to improve services and benefits offered to you and to future relationships between, you, Air New Zealand and our financial partners, including identifying and presenting offers for products, services, marketing, statistical data analysis, market research or promotions
- Conduct and develop our business

You should also refer to relevant terms and conditions for the various programmes, such as Koru or Airpoints terms and conditions.

Online & mobile applications

We use the information we collect about your **web use** so that we can help to make sure you're getting the best out of our online and mobile services. We use this information to:

- Enable you to use online and mobile services, such as signing in to and managing your online account and mobile applications
- Make your future bookings easier, for example by allowing you to create a "traveller profile" that will pre-populate certain information for future bookings
- Facilitate billing, confirm bookings and notify you of flight changes
- Administer our websites and mobile applications
- Inform our internal operations
- Identify and fix technical problems with our online systems
- Keep our mobile applications and websites secure
- Perform marketing and sales analysis and research to inform marketing activities and communications for business improvement
- Credit you with the correct Airpoints Dollars for purchases made via online systems

Keeping you safe

Air New Zealand takes its responsibilities in relation to airline safety and security very seriously. As part of this responsibility we cooperate with the many agencies that collaborate together to ensure the safety and security of our customers, passengers and employees.

This may require us to use the personal information we collect, whatever product or service it relates to. We will only ever use personal information in this way if we believe it is absolutely necessary. It's important to us to be open about this, as it forms a big part of our culture to 'think privacy & do the right thing'.

We may also use your personal information to:

- Ensure that we can identify, understand and manage any risks to our customers, passengers, employees, business or property
- Ensure compliance with regulatory authorities and law enforcements
- Manage any emergencies that affect our customers, passengers, employees or other travellers and to ensure that our service providers and partners are able to do so
- Train our employees and service providers to understand how to manage risks, disruptions and emergencies

We may also use sensitive information **from other airlines and agencies**, particularly where this information relates to disruptive behaviour or any issues that may impact on the comfort, safety and security of our customers, passengers, employees and aircraft operations.

The types of organisations we cooperate with are set out in How we share your info.

Staying in touch & being relevant

We use the personal information we collect to build a picture of who you are, and to ensure that you receive meaningful and relevant marketing and communications from us, our airline, financial, business and retail partners, as well as our Airpoints partners.

We use your personal information to:

- Conduct market, product or sales research, data processing and statistical analysis, and business improvement analysis (for us and our partners)
- Better understand your preferences so that we can improve our products and services and provide you with a more personalised experience
- Present you with information about suitable offers and promotions of products and services (from us and our selected business partners) that might interest you (such as sending you emails); and
- Present you with survey requests and obtain feedback about our products and services

We use personal information about your use of our websites (through <u>cookies</u> and other technologies) and mobile applications to:

- Track and analyse your usage of our websites to improve the relevance of our website content
- Measure the effectiveness of and to improve the relevance of internet advertising and promotional emails
- Conduct market, product or sales research, statistical analysis and business improvement analysis

We use personal information about your participation in our promotions, competitions and surveys to:

- Communicate with you and process your entries, requests or answers
- Conduct market, product or sales research, data processing and statistical analysis and business improvement analysis

You can find out how to <u>opt out</u> of receiving promotional communications from us, or ask us to stop processing your personal information for marketing, survey, statistical analysis or research purposes, by clicking on the <u>Your right to choose</u> section in the privacy centre or by signing in to update your preferences on your Air New Zealand online account on our website.

Combining information to give better services

Sometimes we combine the information we collect about you. This is outlined in our Airpoints terms and conditions.

We combine information to learn about your interests and preferences to make sure we're providing you with the most appropriate services, products, offers, promotions and communications. We also do this to improve our products and services.

To achieve this, we may combine your programme or membership information (including that of airline, financial, business and retail partner programmes) with information we may already hold about you. This could include your booking, browsing or purchase history, information about the use of our online or mobile application products and services or about your location (should you choose to share it with us).

Sensitive personal information b

In some countries, sensitive personal information is managed differently to other personal information. Sometimes we must disclose sensitive personal information to provide services to our customers (passport details for example contain sensitive personal information such as your biometric facial image and your credit card transactions contain financial information). Sensitive information includes personal information about the following:

- Physical or mental health
- Biometric information
- Religious beliefs
- Race
- Financial (payments)
- Criminal history

We will only use sensitive personal information when we have to, and only to:

- Provide any special assistance or other services you require
- Ensure the safety and security of our customers and employees and compliance with requests from government or law enforcement agencies (as explained in the <u>Keeping you safe</u> section above)

- Investigate and manage any complaints or incidents raised with us
- Enable financial transactions for the goods and services you have requested
- In other ways where required or permitted by law

We may combine sensitive information with other personal information we hold about you but only with your consent for marketing, research or business analysis purposes.

Wherever we use it, we will treat sensitive information carefully.

Applicants & candidates

We'll use the personal and sensitive information we collect from you so we can assess your application. We will also use this information to contact you to discuss or manage the application process. Where you have provided consent for us to contact your referees and other third parties as required, we will do so to obtain the information we require to help us recruit the best people to be the face of Air New Zealand wherever we are.

The information we collect and how we collect it, is outlined in <u>How we collect your</u> information.

We will use this information to obtain up to date and accurate details, to verify your background, work and education, health or disabilities that may impact your work, skills, qualifications, your experience and your credit, vetting and security status to ensure you are a good fit to work with us.

How we share your info

To achieve the purposes set out in the How we use your info section, from time to time we need to share your personal information with third parties. In this section, we explain the ways we share your personal information.

If you can't find what you're looking for ask us.

Providing you products & services

To ensure that we can provide you with the products and services you have requested from us, we may need to disclose your personal information to trusted third parties, including:

- Our agents or service providers (such as reservation agents, other airlines, catering agents, travel service providers, freight providers, car rental or hotel providers and airport management for ground handling services) to facilitate your travel and any other requests you've made
- Other passengers named on your booking as part of the online check-in process
- Employees of handling agents offshore for ensuring safe chain of custody throughout an **unaccompanied minor's** journey with us
- Our data and technology service providers to support our systems, data processing and storage, infrastructure and network communications, and development of software and systems
- Regulatory authorities and law enforcement agencies such as immigration, customs, border security control for legal compliance and to ensure the safety of our customers, passengers and employees
- Forensic and investigatory service providers for investigating a data breach or incident
- Our partners who conduct marketing and market research, statistical or business analysis
- Your employer if you travel on a corporate, government or business programme for reporting and incident management
- Providers of information assurance services who we have entered agreements with

Loyalty programmes & membership services

If you participate in our <u>loyalty programmes or membership services</u>, we may disclose your personal information to:

- Airpoints partners and other third parties involved in the Airpoints programme
- Star Alliance and other airline partners
- Financial service providers offering Airpoints credit cards (if you apply for or hold one)
- Business and retail partners such as operators of our online Airpoints Mall (if you shop online at the Airpoints Mall)

If you're a member of one our <u>loyalty programmes or membership services</u> (including Airpoints members who are minors), we will also use your personal information to:

- Administer your application and participation in our loyalty programmes such as Airpoints and other Air New Zealand loyalty programmes such as Airpoints for Business
- Administer your application and enable your participation in our membership services, such as Koru
- Administer and enable transactions in Airpoints Dollars that you may use on products and services with our retail and Airpoints partners. This may include your Airpoints number, transaction and purchase history such as details about where, when and how frequently you shopped to administer your Airpoints Dollars
- Administer membership and benefits with our trusted airline partners, such as Star Alliance and other airlines. We may use your information to improve services and benefits offered to you and to future relationships between, you, Air New Zealand and our airline partners, including identifying and presenting offers for products, services, marketing, statistical data analysis, market research or promotions
- Administer membership and benefits with our trusted financial partners for OneSmart, Travelcard and our Airpoints credit card holders. We may use your information to improve services and benefits offered to you and to future relationships between, you, Air New Zealand and our financial partners, including identifying and presenting offers for products, services, marketing, statistical data analysis, market research or promotions
- Conduct and develop our business

You should also refer to relevant terms and conditions for the various programmes, such as Koru or Airpoints terms and conditions.

Keeping you safe

Air New Zealand takes its responsibilities in relation to airline safety and security very seriously. As part of this responsibility we cooperate with the many agencies that collaborate to ensure the safety and security of our customers, passengers and employees.

This may require us to disclose the personal information we collect, whatever product or service it relates to. We will only ever disclose personal information in this way if we believe it is necessary. It's important to us to be open about this, as it forms a big part of our culture to 'think privacy & do the right thing'.

To ensure the safety and security of our customers and our employees, we may need to disclose your personal information to the following third parties:

- The police or other law enforcement agencies usually on request but from time to time because we have chosen to seek the assistance of law enforcement agencies. Where the Police have requested personal information from us, we will provide only the information necessary to assist them if legally permitted. If we're unsure in any way about the request, we may ask the Police to provide us with a search warrant requiring us to release the information
- Customs and immigration authorities in any of the countries named in your travel itinerary, where we're requested to do so under the laws of that country or where we must to provide you with services you have requested

- Airport management, aviation safety and security personnel or other airlines where necessary to prevent or lessen a serious threat to the safety of any person or
 to manage a security risk or where we must to provide you with services you have
 requested
- The Civil Aviation Authority or other international air safety regulators where necessary to assist with an investigation or to generally promote and protect safety and security
- Other government agencies where required by law
- Providers of information assurance services who we have entered agreements with
- Family or friends where necessary to assist with the management of an emergency or ensure the health or safety of that customer and where legally permitted

If you would like to know more about how we use your personal information, refer to How we use your info.

Sensitive personal information

In some countries, sensitive personal information is managed differently to other personal information. Sometimes we must disclose sensitive personal information to provide services to our customers (passport details for example contain sensitive personal information such as your biometric facial image and your credit card transactions contain financial information). Sensitive information includes personal information about the following:

- Physical or mental health
- Biometric information
- · Religious beliefs
- Race
- Financial (payments)
- Criminal history

We will only disclose sensitive personal information when we must, and only to:

- Our agents or other third parties to provide any special assistance or other services you require (such as airports and catering service providers, credit card or other financial product providers, Airpoints programme partners)
- Government, regulatory authorities, law enforcement agencies to ensure the safety and security of our customers, passengers and employees and compliance with requests from such parties (as explained in the <u>Keeping you safe</u> <u>section</u> above)
- Medical professionals where we believe this is necessary to prevent or lessen a serious threat to your health
- Trusted third parties to investigate and manage any complaints or incidents raised with us
- In other ways where required or permitted by law

We may disclose sensitive information combined with other personal information we hold about you but only with your consent for marketing, research or business analysis purposes.

Sharing information overseas

As an international airline, we operate in many countries. This means that we may be required to disclose personal information such as contact and flight details collected from people in New Zealand or in other countries. We may also share personal information about our customers, passengers or employees or other organisations in other countries where this is required to complete transactions and provide you with products and services.

Many of the countries we operate in have equivalent or stronger privacy regulations to those in New Zealand. However, some have weaker privacy regulations in place. If we have to transfer your personal information to another country, we take reasonable steps to protect it. For example, we use legal contracts with third parties to require that they meet our privacy expectations at all times. Sometimes we are required by the laws of other countries to share personal information. In those cases, it can be more difficult to ensure that it is protected to the standard we would expect.

As explained in the <u>How we protect your info</u> section in the privacy centre, we store the personal information we collect with our data storage and systems support providers. If we've collected information about you from elsewhere, then we may have to share it across borders to store it. We will do this with the appropriate legal agreements in place to help protect your information.

Applicants & candidates

From time to time we need to share applicant personal information with third parties. We only share information in the ways set out below, or otherwise if required or permitted by law. We may also ask you to give us consent when required to disclose the personal information we collect to:

- Our third party recruitment services providers
- Any third party we approach to collect personal information about you (such as the Ministry of Justice, a credit reporting or vetting agency or a referee) to enable necessary pre-employment vetting where applicable for the position you have applied for
- Aviation security specialists such as the Civil Aviation Authority in New Zealand or other similar bodies if you are applying for international roles outside of New Zealand
- Government agencies, regulators or law enforcement agencies where required by law
- Health professionals who conduct and obtain medical information relevant to positions applied for
- Education or other professional agencies to check qualifications

How we protect your info

We know that you will only entrust us with the information we need if you believe that we'll **do the right thing with it** and treat it with **care and respect**. Here's a few things you need to know about the way we protect your personal information and how you can help protect your information too.

Good privacy practice is at the heart of Air New Zealand's culture. We want to make sure all our Air New Zealanders understand our privacy obligations and appreciate that they must treat the personal information we hold with care and respect.

If you can't find what you're looking for ask us.

Our security safeguards

We take all reasonable steps to ensure that the personal information we hold is protected against loss, and unauthorised access, use, modification or disclosure. As part of this, we:

- Use only secure servers
- Use industry standard encryption for the transmission of personal information on Air New Zealand websites, for example when you pay by credit card online. Known as SSL (Secure Sockets Layer) protocol, you can check this is active by looking for the padlock symbol on many browsers. SSL allows a secure connection between your internet browser and our internet server, using a private (or secret) key to encrypt the information
- Require any third party suppliers we use to agree to a Code of Conduct that includes specific reference to our privacy and data protection expectations and requirements for both information and physical security
- Require any third party suppliers who handle personal information to comply with global data protection legislation relevant to the services they are providing and with our internal information security and other relevant policies such as cloud security requirements
- Ensure that our employees and service providers have access to only the personal information they need to do their jobs and understand that they should not look for personal information about family or friends at any time
- Train our employees to ensure that they understand how to handle the personal information you have entrusted to us
- Require our employees to be aware of our privacy expectations to respond to any breach of security swiftly and effectively, as set out in Air New Zealand's internal information security policy, privacy policy and data breach response process

Protecting your own personal information

We have outlined our commitments to keep your personal information safe but there are a few things you can do to protect your own personal information and therefore, your privacy.

To help us protect your information, you must keep your personal information that relates to how we provide you products and services, secure. This includes:

- Your Airpoints card, Airpoints luggage tags and Airpoints membership number
- Online My Air NZ account password or Personal Identification Numbers (PINs)
- Any username and password details for accessing your Air NZ mobile application services
- Your Passenger Name Record (PNR) this is often referred to as your flight booking reference
- Your boarding pass, this may contain your Airpoints number and other personal information about you

Sharing of these details could enable others to access your Airpoints Dollars and travel bookings, or other information held on our websites. Therefore, potentially leading to the misuse of your personal information.

We have legal obligations under privacy legislation to hold information securely and to use it appropriately, in accordance with this privacy statement. If you think the personal information that you have shared with us has been compromised or if you feel we have breached these obligations, please let us know immediately by contacting privacybreach@airnz.co.nz.

Storage & deletion of personal information

The personal information we collect about you is held by Air New Zealand and its trusted data storage providers. We hold information in a combination of physical and electronic files. To ensure that all the electronic personal information we collect is stored safely we must at times transfer that information to our servers in New Zealand, Australia and other countries. To ensure that the physical information we collect is stored securely we use specialist third party document storage providers.

New Zealand's privacy regulation has been formally recognised by the European Union (EU) as meeting the privacy obligations of current EU regulations.

We retain the personal information we collect only for if we need it to support justifiable business requirements or when our lawful purposes for using the information are no longer relevant. When we no longer require personal information we or our third party suppliers will securely delete and/or archive the information.

Applicants & candidates

We retain the personal information we collect about applicants and candidates only for if we have a lawful purpose to use and retain it and only with your consent.

We will ask you if we can retain your application information in case we think you would be suitable for other roles in the future. We may occasionally check with you that the application information we hold remains accurate and up to date.

We'll dispose of your application information securely and carefully.

We require our third party suppliers to comply with the privacy and data protection clauses relevant to retention and deletion in our service agreements.

Control

Privacy is about control.

To ensure that you have some say in the way your personal information is collected, used and shared, privacy law gives you rights that help you to retain that control.

At Air New Zealand, we know that being open, transparent and honest will enable you to trust us.

We know these rights are very important to you and we take them very seriously. For us, they form a big part of our culture to ensure that **customers are at the core** of everything we do. We're committed to 'think privacy & do the right thing'.

If you can't find what you're looking for ask us.

Your right to know

Accessing your information

You have the right to know what information we hold about you and to **request a copy** of this. The types of information we may hold about you are listed in the How we collect your information section.

What's the process?

You can access a lot of the personal information we hold about you yourself, by signing into your Air New Zealand online account. There you can see all the details you have provided to us as well as most of the information we have collated relevant to your account and your interaction with us. You can also manage your options for communication preferences.

If the information you're looking for is not in your Air New Zealand online account then you can make a request by using our online request form.

When you make your request, we must take steps to confirm that you're authorised to access the information. This might involve asking you some security questions, checking your identity documents or verifying your signature. Please understand that we must do this to protect your privacy.

We're required by law to decide on your request as soon as we can and to notify you of that decision no later than 20 working days after you make your request. We'll try our best to respond quickly. Where we cannot decide within 20 working days, we'll let you know and explain why.

What if we say no?

We will be as open as we can with you but sometimes we might not hold any personal information about you or may have to withhold personal information from you. For

example, where the information is not personal information about you, is commercially sensitive, is legally privileged, relates to the personal information of another person, or it may impact on the safety or security of our employees or customers to release it. In these circumstances, we will withhold the information but we'll tell you why.

If you're unhappy with the decision we've made about your request for a copy of your personal information, then let us know by explaining this through the online request form.

Updating & correcting your information

You can ask us to correct the information we hold about you if you think it's wrong. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact us through the <u>online request form</u> and we will remove the minor's personal information.

What's the process?

You can also correct and update a lot of the personal information we hold about you yourself, by signing into your Air New Zealand online account from our website. Here you can see most of the details we hold about you and you can manage your preferences and communication options.

If the information you're looking for is not included in your Air New Zealand online account, then you can make a request for your personal information by contacting us through the online request form.

When you make your request, we must take steps to confirm that you're authorised to access the information. This might involve asking you some security questions, checking your identity documents or verifying your signature. Please understand that we must do this in order to protect your privacy

We're required by law to decide on your request for correction as soon as we can and to notify you about our decision no later than 20 working days after you make your request. We'll try our best to respond quickly. Where we cannot decide within 20 working days, we'll let you know and explain why.

What if we say no?

We'll try our best to correct any information that you believe is inaccurate. But, if we do not agree that the information should be corrected, we'll attach your request to the disputed information in your Air New Zealand online account as a "statement of correction".

You can ask us to correct the information we hold about you if you think it's wrong. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact us through the <u>online request form</u> and we will remove the minor's personal information.

Your right to choose

Managing your preferences

We like to talk to our customers, especially when we've got great ideas and deals to share. But we accept that sometimes you might not want to hear from us in that way, and we respect that choice.

You can ask us not to use your personal information for communications, marketing or promotional purposes at any time. Here are a few easy ways to do this:

- Unsubscribe to our marketing emails using the unsubscribe function on our Air New Zealand mobile applications (but note that we will still contact you from time to time to manage the services you have asked us for)
- Update your communication options through your profile when you sign in to your Air New Zealand online account
- Call us on 0800 737 000 (or +64 (0)9 357 3000 if you're not in NZ)
- Contact us via our website through <u>ask us</u>

Ask us to stop using your information

In some circumstances, you also have the right to ask us to stop using your personal information. To do this, you should contact us through the <u>online request form</u>.

Engage

Find out how to get in touch and read our frequently asked questions about privacy.

Ask us

While we'd love to say that we get things right every time, this is not always the case. We accept that sometimes we can get things wrong. We think the important thing is how we handle it when we do.

You can contact us at any time to ask us about our privacy practices, to let us know if you're concerned about something we've done to or to make a complaint about the way we've handled your personal information. We value your feedback.

The best place to start is to contact us through the <u>online request form</u>.

Alternatively, you can call our customer service team on 0800737000 (or +64(0)93573000 if you're not in NZ). If necessary, you will be put through to our dedicated privacy team.

We'll try our very best to understand and resolve your concerns. However, if you're not satisfied with the way we've handled your complaint, then you also have the right to make a complaint to the privacy regulator - or data protection authority - in the country in which you reside. The contact details for these regulators are set out below. If the regulator you need is not listed below, then ask us and we'll help you to find them.

Contact information (+/-)

New Zealand

Office of the Privacy Commissioner PO Box 10-094 The Terrace Wellington 6143 New Zealand

0800 803 909

privacy.org.nz

Australia

Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001

1300 363 992

oaic.gov.au

Canada

Office of the Privacy Commissioner of Canada 30 Victoria Street Gatineau Quebec K1A 1H3

1-800-282-1376

priv.gc.ca

United Kingdom

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

0303 123 1113

ico.org.uk

Hong Kong

Privacy Commissioner for Personal Data 12/F Sunlight Tower 248 Queen's Road East Wanchai Hong Kong

2827 2827

pcpd.org.hk

FAQs

We're always trying to learn from you, understand what you want, and improve the way we do things. We know there are some things that our customers really care about, and when we get asked a question a lot, we've included some additional information here.

Below are some of the frequently asked questions we get about privacy. We add to them all the time.

Remember, if you can't find what you're looking for ask us.

What is privacy all about?

Privacy is about protecting your personal information, that is, information that can be used to identify you (for example, your name and your travel details). At Air New Zealand, we protect your personal information in a number of ways. We aim to be transparent about

the personal information that we collect, and we protect personal information from accidental loss, or unauthorised disclosure.

Can I get a copy of the information Air New Zealand holds about me?

Yes, you can. The privacy laws of many countries, including New Zealand, give you the right to request a copy of the personal information we hold about you and we take this right very seriously. Find out how to make a request in <u>Your right to know</u>.

Can I access and/or change a booking for my partner/child?

Before we can discuss or share personal information about someone else with you, we need to make sure that you're authorised by that person to have access to the information. Where you're the person who made the booking, then we'll just need to make sure you are who you say you are. We'll ask you a few questions to verify this. Where you didn't make the booking, we'll need to make sure you're the child's parent or guardian or confirm that you've been authorised by your partner or relative.

If we can't be sure that you're authorised, then we won't be able to make any changes or share any information with you. We appreciate that this might be frustrating but we must protect our customers' and their confidential information from harm.

Can I access, change or delete a child's personal information in their Airpoints ™ membership?

Yes, you can access, change or delete a child's personal information directly through logging in using the account details set up at the time you created the account for your child on Air New Zealand's website.

If you are having difficulties logging in, we recommend that you contact us by using our <u>online request form</u> or by calling us on 0800 737 000. We need to make sure that you're authorised to have access to the information. If we can't be sure that you're authorised, then we won't be able to make any changes or share any information with you. We appreciate that this might be frustrating but we must protect our customers' and their confidential information from harm.

Does Air New Zealand share personal information with the Police?

Yes, but only when necessary. Sometimes the Police ask us for personal information when they're managing an emergency or investigating an immediate threat. In other cases, they may ask us for personal information as part of an ongoing investigation. If a request is made with urgency from a law enforcement agency, then we'd rather comply than prejudice their efforts. However, if a request is more general, then we may ask the Police to provide us with a search warrant, to ensure that the information they've asked for is necessary.

You can find out more about the ways we share personal information to keep you safe in How we share your info.

Can I find out where & when my friend is traveling?

Before we can discuss or share personal information about someone else with you, we need to make sure that you're authorised by that person to have access to the information. Where you're not a relative, then we'll need to get this authorisation directly from the person.

If we can't be sure that you're authorised, then we won't be able to share any information with you. We appreciate that this might be frustrating but we must protect our customers' and their personal information from harm.

I have protection order against my ex-partner & I'm afraid they'll find out where I'm flying. What should I do?

If you have real concerns about particular people getting access to your personal information, then you must let us know. We take reasonable precautions to make sure that people who request information are who they say they are and are properly authorised but sometimes people can be determined. If you let us know about a particular concern or risk, then we can make a note of this on our system so that our customer service representatives will know to take extra care when they receive a call from a third party.

Does Air New Zealand share personal information with other airlines?

Yes, but only when necessary. Sometimes we need to share your personal information with other airlines to ensure that you receive the services or products you've requested and we are using codeshare partners to operate the flight. We may also need to share sensitive information about you, such as health information or information relating to disruptive behaviour, if we believe this is necessary for safety or security purposes.

Find out more about the ways we share personal information to keep you safe in <u>How we</u> share your info.

How do I opt out of direct marketing?

We like to talk to our customers, especially when we've got great ideas and deals to share. But we accept that sometimes you might not want to hear from us in that way, and we respect that choice. You can <u>ask us</u> not to use your personal information for marketing or promotional purposes at any time. You can find out how to do this in Your right to choose.

Does the Air New Zealand app have access to my contacts?

No, none of the Air New Zealand apps - Air NZ mobile app, OneSmart™ app, KiaOra app or grabaseat™ app - have access to your contacts. From time to time, these apps may need to access your location information to provide you with a service, such as confirming a booking or making sure you can order coffee in our lounges. The apps will always ask your permission before accessing your location information.

You can find out more about the personal information we collect through our websites and mobile applications in How we collect your info.

Will you use my health information for direct marketing to me?

No, we won't. We treat sensitive information like health information very differently to the other personal information we collect. From time to time we must collect information

about medical conditions that may impact on the services we're providing or on other customers. We will only ever use this information to manage the services we provide to you, and we won't combine it with other information we hold about you in the same way that we might with more general information like your website use and booking history.

You can find out more about the way we use and share sensitive information in <u>How we use your info</u> and <u>How we share your info</u>.

Where can I view Air New Zealand's privacy policy?

View our privacy policy.

View our cookie policy.

Is my personal information safe with Air New Zealand?

We take privacy extremely seriously and we have many measures in place to minimise the risks. We use industry standard technologies to protect our IT systems from misuse. We also provide privacy training to our employees, to ensure that they understand their responsibilities when handling your personal information.

Are my credit card details secure?

Yes, we take great care to protect your payment and credit card details and uses independently certified encryption technology.

Does Air New Zealand tailor its website to meet my needs?

We try to ensure that our websites meet our customer's needs and interests. Cookies and other website technologies help us to update the content on our websites to make it relevant and interesting to our customers. More information can be found in our <u>cookie policy</u>.

We've also developed some other innovative features to try to make it easier and quicker for your visit our website. For example, when customers fill in flight booking details on our websites, we also ask customers if they would like our website to remember their details for next time. For our customers who select this option, we then prepopulate their booking details into their next booking. This helps our customers save a lot of time.

What can I do to protect my personal information?

There are several measures that you can take to protect your personal information, including:

- Use strong passwords for all your online accounts
- Do not use trivial passwords (such as single dictionary words)
- Do not use the same password for multiple accounts
- Use long passwords (at least 10 characters, but preferably much longer)
- Use passwords which contain a combination of upper and lower case letters, numbers and special characters, for example: \$ % * & etc.
- Keep your passwords secure (never written down, or shared with anyone)
- Change your passwords periodically

If I believe there has been a breach of privacy, where can I make a complaint?

We have legal obligations under privacy legislation to hold information securely and to use it appropriately, in accordance with our privacy policy. If you feel we have breached these obligations, please contact our Privacy Officer at privacybreach@airnz.co.nz.

Does Air New Zealand use my personal information for marketing?

Yes, we may use your information individually or combined with other information we maintain or collect from third parties to provide personalised offerings that are relevant and helpful. These offers can be via email, direct mail, web or other electronic advertising. Offers can be for Air New Zealand, our partners or other third parties, that we think might be of interest to you.

If you are no longer interested in receiving these offers you are able to unsubscribe directly within our email communications or, if you are an Airpoints member, you can update you communication preferences upon logging into your profile.

You can find out more about the ways we use personal information in <u>How we use your info</u>.

Does Air New Zealand allow any other businesses to access my personal information?

Yes, to ensure that we can provide you with the products and services you have requested from us, we may need to disclose your personal information to trusted third parties.

You can find out more about the ways we share your personal information in <u>How we share your info</u>.

Does Air New Zealand gather personal information about me from other sources?

We need to interact across our business and with external third parties to collect your information and provide you with the travel experience, products and services you request. This may include interactions about bookings, shopping, parking and other transactions, communications and marketing, programmes and membership services, employment applications, competitions, promotions and surveys, visiting our websites and using our apps.

How we collect your information will differ depending on the circumstances when we interact with you and the services or products you request.

We may collect your information through our trusted parties, such as travel agents, corporate travel arrangers, financial, business and retail partner programmes, other airlines and alliances, call centres, freight companies, airport and aviation security and management, other airlines, marketing and analytical services, competitions, promotions and survey providers, and regulatory authorities such as immigration, customs and border security services.

We may also collect your information that is publicly available, for example through social media or public directories.

You can find out more about the ways we collect your personal information in <u>How we</u> collect your info.

What does Air New Zealand do with my personal information?

We take all reasonable steps to ensure that the personal information we hold is protected against loss, and unauthorised access, use, modification or disclosure. We know that you will only entrust us with the information we need if you believe that we'll **do the right thing** with it and treat it with **care and respect**. Good privacy practice is at the heart of Air New Zealand's culture. We want to make sure all our Air New Zealanders understand our privacy obligations and appreciate that they must treat the personal information we hold with care and respect.

You can find out more about the ways we protect personal information in How we protect your info and the ways we use personal information in How we use your info.