

# Air Canada Privacy Policy

Last update: 9 September 2022

This Privacy Policy provides you with important information about how Air Canada handles your personal information.

Your privacy is important to us, and safeguarding your privacy is fundamental to our business.

Whether you are using our website, mobile application, other online platforms or contact centres, this policy applies.

We encourage you to periodically review this policy, as we may update it from time to time. Updates will be posted on our website and we will take reasonable steps to alert customers to any significant changes before they take effect.

This policy may be supplemented by other consents you provide, and by any terms and conditions that you agree to as part of your purchase or participation in any other Air Canada products, services, promotions, contests or events.

## Privacy Policy topics

### **1.To what information does this policy apply?**

This policy applies to personal information. Personal information is any information about an identifiable individual, such as your home address, telephone number, email address, and details about your transactions with Air Canada and method of payment.

This policy does *not* apply to anonymous information – which is any information that does not include an individual’s name, contact information or any other information that could reasonably be expected to identify the individual.

### **2.What personal information do we collect and when?**

**We collect personal information when you interact with us**, for example:

- *When you contact us*, we collect information about that interaction, such as when and why you contacted us.
- *When you browse our website or other online platforms*, including third party websites that are co-branded with Air Canada, we collect information including your internet protocol address, device type and browsing activity – for more information please see our [Cookies and Tracking Technologies Policy](#).

- *If you are an Air Canada VIP or Aeroplan Super Elite Member and use our concierge agent, we collect personal information you share with our concierge agent to provide personalized concierge service.*

**We collect personal information when you book travel with us**, for example:

- If you are booking travel, we collect personal information that you provide to us to
  - complete the transaction,
  - ensure we can contact you as necessary,
  - assess your fare eligibility, such as discounts for infants and children, and
  - enable us to verify your identity for legal and security purposes.

The personal information we collect for these purposes includes the following: name, address, telephone number, email address, payment card number and expiry date, passport or other government-issued identification information, date of birth. We also request your gender to assist in estimating the aircraft's total load and as an additional identifier. *If a third party is booking your travel, see Third Party Bookings (below).*

- If you've booked travel on another airline, and part of your itinerary is on Air Canada (a code share or interline ticket), we collect information from that airline to permit your travel with us.
- If you make any requests for special assistance – for a wheelchair, on-board oxygen, a meal preference, or an unaccompanied minor, for example – we collect the information needed to accommodate your request. This may include relevant medical information, and will be apparent to you at the time of collection. *If a third party is booking your travel, see Third Party Bookings (below).*

**We collect personal information when you travel with us**, for example:

- *To grant you access to Maple Leaf lounges,*
- *To complete your duty-free purchases,*
- *To return delayed baggage to you,*
- *To facilitate our lost and found service, if you left your belongings on a flight or at the airport*

**We collect personal information reasonably needed to fulfill our business purposes**, like the purposes discussed in part 3 “Why do we use and share your personal information?”.

**If you are an Aeroplan Member, we also collect information about your activity in that program** – see part 4 “Additional collection, use and disclosure of Aeroplan Member personal information”).

**If you are an Aeroplan Member, we also collect information to deliver, promote and develop our [Aeroplan Elite Status](#) program**

Aeroplan Members who fly with Air Canada and Star Alliance airlines automatically participate in Air Canada's Aeroplan Elite Status program, which provides status holders with travel-related benefits such as free checked bags, cabin upgrades and lounge access.

Air Canada will collect from Aeroplan your basic account information, such as your email address, mailing address, phone number, gender, date of birth, and the date and method of your enrollment in Aeroplan.

Air Canada will use this information to deliver, promote and develop the Aeroplan Elite Status program and to provide certain services to Aeroplan Elite Status participants. These include:

- ensuring that the Aeroplan number you provide with your booking is valid
- providing you better customer service and ensuring that we can contact you about your flight, e.g., during disruptions
- as possible, identifying any flight booking for which you have not provided your Aeroplan number, to ensure that you receive:
  - Aeroplan Elite Status credit and Aeroplan points for that flight, and
  - any travel-related benefits to which you are entitled under your Aeroplan Elite Status tier or your Aeroplan co-branded credit card

### **Third Party Bookings, Changes and Enquiries**

If another person, including a family member, friend, or work colleague, seeks to book travel on your behalf, that person will be asked to provide us with the same personal information that we would normally collect from you directly to complete your booking.

We consider that person to have your consent and authorization to provide us with your personal information for relevant purposes described in this policy – unless and until we are advised otherwise.

Also, if the person who booked your travel or who otherwise has your full name and booking reference contacts us and seeks information on your booking or wishes to make changes to it, we will disclose your booking information – including whether you boarded a flight – and allow that person to make changes, as we will conclude that you have given them your consent for this. ***If you do not want an individual to be able to obtain information on or make changes to your booking, you should not share your booking reference with them.***

When you book through a travel agent, we consider that agent to have your consent to disclose to us the same information you would provide yourself. Collection, use and disclosure of your personal information by the agent is subject to the privacy policy of the agent.

### **3. Why do we use and share your personal information?**

**We use and share your personal information to respond to your requests or complete your transactions** – including to:

- *Communicate with you*, such as to advise you of changes to your bookings or respond to your questions

- *Complete your bookings and fulfil your requests for our products and services, including requests for special assistance or meals, which may be provided by third party catering services or ground handlers* If your travel includes a *transfer to another airline*, we will share relevant personal information to facilitate that transfer, including date of birth (to support fare eligibility and identity verification) and any requests for special assistance (so the receiving airline can accommodate those requests as possible)
- We may share your information with third party business partners such as travel agencies, or car rental companies or hotels you have booked through us
- **If you are the holder of Aeroplan Elite Status**, we share your Aeroplan number, name and status with applicable partner airlines, including all Star Alliance member airlines, so you receive your benefits in the event of travel.

**We also use and share your personal information to better serve you** – including to:

- *Manage and improve your travel*, for example, to optimize family seating
- *Administer our websites, mobile applications and online platforms*, and make them easier for you to use, such as by pre-populating forms with your contact information or other applicable personal information
- *Address customer service matters*, including travel reservations and questions you may have about your bookings
- *Monitor and maintain the quality of our operations*, such as monitoring or recording telephone discussions with our representatives for quality assurance purposes

**We also use and share your personal information to improve our products and services and to provide you with relevant offers** – through:

- *Analysis to better understand your preferences, needs, and interests*
- *Marketing of relevant travel opportunities, benefits, products and services* that are most likely to be of interest to you. This includes serving you advertisements on other websites (for more information, see the [aircanada.com Cookies and Tracking Technologies Policy](#)) and sharing identifying information – for example, your hashed email address – with social media providers to make relevant offers to you on their platforms.

**We also use and share your personal information to address our business and legal needs** – including to:

- *Ensure the safety and security of our operations*
- *Fulfil legal requirements* – for example, all airlines, including Air Canada, are required by security laws in Canada, the U.S. and several other countries to give border control agencies access to passenger data when you may fly into or over a country – accordingly, any information we hold about you and your travel arrangements may be disclosed to customs and immigration authorities of any country in your itinerary
- *Protect our business or legal interests*, such as to investigate, detect or prevent fraud or harm to our systems
- *Measure the success or effectiveness* of Air Canada offers, promotions, benefits contents, products and services

- *Generate de-identified information* for further analysis, such as to identify trends about our customers as a whole, including to support decisions about improvements to our products, services or operations
- *Fulfil other purposes* to which you may consent, or as permitted or required by applicable law

**If you are an Aeroplan Member, we also use and share your personal information as part of that program** – see part 4 “Additional collection, use and disclosure of Aeroplan Member personal information”).

#### **Air Canada for Business**

If you make your booking through the Air Canada for Business loyalty program, your employer, travel arranger, and other parties may be able to access certain information with respect to your bookings and make changes to it. For more information on the Air Canada for Business loyalty program, please consult the [Air Canada for Business Frequently Asked Questions](#).

#### **Transfers to Our Service Providers**

We may transfer your personal information to service providers who support us with various functions including reservations and ground handling, information security, data storage, research, customer relations, payment processing, data analysis, email delivery, IT, customer service, and marketing. These service providers process personal information on our behalf for our purposes only, and must agree to certain privacy obligations in their contracts with us. These include complying with privacy laws, safeguarding the personal information, and only processing that information under our direction for permitted purposes.

### **4. Additional collection, use and disclosure of Aeroplan Member personal information**

#### **Sharing between Air Canada and Aeroplan**

We want you to travel more and travel better.

To maximize the value of your Aeroplan Membership to you, and to serve you better, we collaborate extensively with Aeroplan. Part of this collaboration involves sharing relevant personal information between Air Canada and Aeroplan.

#### **We may receive personal information from Aeroplan to support program administration and engagement.**

- *When you redeem points for an Air Canada product or service*, Aeroplan provides us with your name and contact information.
- *To enable us to better tailor our offers to you and to provide you with more opportunities to earn points and receive rewards*, Aeroplan provides us with information about your interests, preferences and purchasing patterns.

#### **We may receive personal information from Aeroplan to make it easier for you to book a flight.**

- *When you contact us to book a flight and provide your Aeroplan number*, we are provided with information about your flight preferences that you store in your

*Aeroplan profile, like seating preference and choice of meal, and other information required to hold a flight booking.*

**We may share your personal information with Aeroplan when you interact with us**

- *When you make purchases with us, we provide information about the transaction to Aeroplan – such as transaction date, dates of travel, price, destination, products purchased (such as ticket type, checked bag, advance seat selection), and any other information you provided as part of that transaction.*
- *When you receive our emails, we may share information with Aeroplan about how you engage with us, such as whether and when you open our emails – for more details, please see the [aircanada.com Cookies and Tracking Technologies Policy](#).*
- *When you visit or use our website or mobile application, we may share information about that visit or use with Aeroplan, such as the webpages you viewed, search queries, frequency of visits, time spent on the site or application, and location information (e.g. to identify where you will depart when you start the booking process) – for more details, please see the terms and conditions of our website or mobile application, and the [aircanada.com Cookies and Tracking Technologies Policy](#).*
- *When you interact with our social media pages and contests, we may share information about those interactions with Aeroplan.*

Like us, Aeroplan uses that information to better tailor offers to you – giving you more opportunities to earn points and to receive rewards.

For more information on how Aeroplan handles personal information, see [Aeroplan's privacy policy](#).

**Aeroplan Credit Cardholders**

***This section of the privacy policy only applies to Aeroplan Members who have been issued Aeroplan credit cards.***

Aeroplan and Air Canada have partnered with financial institutions to issue Aeroplan credit cards. These credit cards afford members more opportunities to earn Aeroplan points for everyday activities, as well as a range of other travel rewards and benefits.

As Aeroplan is the Air Canada loyalty program, Air Canada will have access to your Aeroplan credit card information, including transactions. Air Canada uses that personal information to better tailor travel-related offers to you – giving you more opportunities to earn points and to receive rewards.

We only use this personal information to better tailor travel-related offers to you, and (if de-identified) to improve our products, services and operations – all with a view to maximizing the value of our products and services to you.

We do not use information about your credit card activity for other purposes, or disclose it, without your express consent or as permitted or required by law.

For more information about Aeroplan credit cards and privacy, review your cardholder documents and your financial institution's privacy policy.

For more information on how Aeroplan handles this credit card information, see [Aeroplan's privacy policy](#).

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## **5. What are your choices when it comes to the handling of your personal information?**

### **Changing Communications Preferences**

You can modify your communications preferences by

- clicking the "Modify Preferences" link on our website,
- using the unsubscribe mechanism in any SMS text or email marketing communications,
- contacting the Air Canada Contact Centre (see part 9 "How can you ask questions or raise concerns about privacy?"), or
- if you're an Aeroplan Member, by logging into your Aeroplan account and adjusting your communications preferences.

As permitted by law, some unsubscribe requests may take up to 10 business days to complete (e.g., if a campaign is underway, you may still receive marketing messages shortly after you unsubscribe).

If you withdraw your consent to receive these electronic marketing communications, you will continue to receive service communications, such as those related to your bookings or other purchases and flight information.

### **Changing Browser or Device Settings**

We use cookies, scripts, pixels, local storage, and other tracking technologies on our website, mobile application and other online platforms to help administer them, to improve your experience, and to improve the program.

For more information on how we use these technologies, including how you may manage certain of these technologies, see the [aircanada.com Cookies and Tracking Technologies Policy](#).

### **Other Data Handling Choices**

If you wish to withdraw from other collections, uses or disclosures of your personal information by Air Canada, please contact us (see part 9 "How can you ask questions or raise concerns about privacy?").

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## **6. Where do we keep your personal information?**

We generally store personal information at our offices in Toronto and Montreal, and at our data centres in Canada and the United States.

Some of our service providers access, use or store your personal information outside of your province or territory, or outside of Canada. The laws of those other places will then apply to that information, including laws that may permit or require disclosing that information to government, courts and law enforcement.

If you would like more information about our policies and practices regarding processing of personal information outside of Canada, please contact our Privacy Office directly (see part 9 “How can you ask questions or raise concerns about privacy?”).

### **7.How is your personal information protected? How long is it kept?**

Air Canada maintains appropriate administrative, technical, and physical safeguards to protect your personal information. These safeguards are intended to prevent the loss, theft or unauthorized access, use, disclosure, modification or destruction of your personal information. For example:

- your personal information is subject to restricted access
- electronic data is protected by technological means, such as firewalls, access controls, encryption and pseudonymization (de-identification of information with pseudonyms). We use multi-factor authentication for members/customers using our Single Sign On authentication process to access Aeroplan and Air Canada applications with a unique username and password.
- we sensitize our personnel to the importance of safeguarding personal information from loss, theft or unauthorized access, use or disclosure

As many of our interactions with you are online or via email, we rely on you to take reasonable steps to safeguard your personal information. For example:

- we expect you to use unique passwords for your accounts with us, and to safeguard those passwords so that they are not used without your permission
- you should not provide us with an email account with us that you share with another person – if you do, then any email messages (including password resets) sent to that email account would be accessible to that other person

Also, when you book travel, you receive a confirmation number or passenger name record (PNR) for the reservation. The PNR number or information should not be shared as it may give others access to your travel itinerary and other personal information.

Like most companies, we cannot guarantee that security safeguards are always effective or that online communications are always secure. A breach of security safeguards can result in the risk of identity theft, for example. In these cases, we act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

We keep your personal information for as long as it is needed to fulfill the purposes for which it was collected, or a longer period if permitted or required by law. When no longer needed, personal information is destroyed, anonymized or disposed of using secure methods.

Please note that if your personal information is collected by a third party, such as a hotel or car rental company, it will be kept in accordance with the privacy policies and records retention requirements of that third party.

### **8. How can you access or correct your personal information?**

You have the right to access and correct your personal information.

You can make a formal access or correction request by contacting our Privacy Office (see part 9 “How can you ask questions or raise concerns about privacy?”). In that case, we will respond to your access or correction request within a reasonable timeframe (but no later than 30 days from your request) pursuant to applicable laws.

If you demonstrate to us that your personal information in our records is inaccurate or incomplete, we will amend the personal information as required. Where appropriate, we will transmit the amended information to third parties having access to your personal information.

It is your responsibility to provide and maintain accurate and complete information.

### **9. How can you ask questions or raise concerns about privacy?**

Our Principal Privacy Officer is responsible for overseeing what we do with your information and for monitoring compliance with this policy and data protection laws. If you have concerns or further questions about how we handle your personal information, or wish to make a formal access or correction request, please contact the Principal Privacy Officer using the contact information below.

Email:

[privacy.vieprivee@aircanada.ca](mailto:privacy.vieprivee@aircanada.ca)

Address:

**Air Canada Principal Privacy Officer**

Air Canada Centre

ZIP YUL 1276

7373 Côte-Vertu West

St. Laurent, Quebec H4Y 1H4

Telephone: (514) 422-6020

Facsimile: (514) 422-2641

Please note that we will need to take reasonable steps to validate your identity prior to disclosing any personal information via the above communications channels.