

Flying Blue Privacy Policy

In this privacy policy, we explain how we collect and use your personal data in relation to our Flying Blue loyalty programme. This privacy policy applies to all personal data that Air France and KLM process if you become a member to our Flying Blue loyalty programme, use our Flying Blue website or mobile apps, or contact us. We process your personal data primarily to take care of your membership and let you benefit from rewards. We may also use your data to send you advertisements and offers tailored to your interests and preferences. In this privacy policy, we provide more information about the personal data we collect and use and what your rights are.

For more information on the personal data that Air France or KLM process if you fly with us, use our airline website or mobile apps, or contact us about your booking or flight, please check the privacy policy of Air France or KLM, which is available on our websites.

1. Who we are

Flying Blue is the loyalty programme of:

- Air France (formally Société Air France, S.A.), a French airline with offices at 45, rue de Paris, F-95747, Roissy CDG Cedex, France (**'Air France'**).
- Koninklijke Luchtvaart Maatschappij NV (also known as KLM Royal Dutch Airlines or KLM), a Dutch airline with offices at Amsterdamseweg 55, 1182 GP in Amstelveen, The Netherlands (**'KLM'**).

We are jointly responsible for the processing of your personal data concerning the Flying Blue loyalty programme. We have an arrangement in place that sets out our respective responsibilities for complying with applicable privacy legislation. In short, we have agreed that you can contact either KLM's or Air France's Privacy Office (please see 'Your rights' below) if you wish to exercise your rights or have any complaints about the processing of your personal data. Air France and KLM will assist each other where necessary to ensure that you can exercise your rights and your questions and complaints are properly addressed.

2. Types of personal data we process

2.1 General

We may collect and process the following categories of personal data:

(A) Name and contact details

When you become a member of Flying Blue, we may record your name, contact details, gender and date of birth. Your contact details may include your address, telephone number and e-mail address. When you create a personal account, we may also record your sign-in details and the information you fill out on your personal account. If you create a family account, we also process the personal data about your family that you add to your account.

(B) Membership data

When you become a member of Flying Blue, we process your membership number, membership tier, and Miles and XP balance. We also process the transactions with which you earn or spend Miles. We register, amongst others, the type of transaction (e.g. webshop purchase, flight, hotel, car rental, Flying Blue branded credit card transaction), transaction date, Miles or XP amount earned or debited, and vendor (Air France, KLM, participating airline or Flying Blue partner). For flights, we also register your place of departure, destination, travel date, flight number, booking class, cabin and fare paid.

(C) Our communication with you

When you send us an e-mail or chat with us online or via social media, we register your communication with us. We also register your communication preferences, for example when you subscribe to one of our newsletters. When you call us, our customer support will register your questions or complaints in our database. We may also record telephone calls for training purposes or to prevent or combat fraud.

(D) Information we collect when you use our websites or mobile apps

- When you visit our website, we may register your IP address, browser type, operating system, referring website, web-browsing behaviour and app use.
- We also collect information via cookies and similar technologies when you visit our website. For more information please read our cookie policy on the website. If you visit our website via a link in an e-mail or when you are logged in to your Flying Blue account, we may link the information we collect via cookies and similar technologies to other data we process about you.
- We receive an automatic notification when you open our e-mails or click on a link in such e-mails. We may combine this information with other data we process about you, such as your membership information.
- With your permission, we may also receive your location data.
- You can also agree to provide us with access to certain data stored on your mobile phone (such as photos and contacts).

(E) Information in relation to social media

Depending on your social network settings, we may receive information from your social network provider. For example, when you sign in to your Flying Blue account using a social network account, we may receive your social network profile including your contact details, interests and contacts. For more information on the personal data that we receive from your social network provider and how to change your settings, please check the website and privacy policy of your social network provider.

(F) Customer data

Flying Blue is a loyalty programme of Air France and KLM. We may use the personal data we collect for our Flying Blue loyalty programme if you fly with us, use our airline websites or mobile apps, or contact us about your flight. Please check the Air France privacy policy and KLM privacy policy for more information on the personal data we collect in this context. You can find our privacy policies on our websites.

(G) Information you choose to share with us

You may choose to share information with us, for example when you share your interests and preferences with us, leave a comment on our Facebook page, fill out a customer survey or submit an entry for a contest.

2.2 Children younger than 16

We collect data about children if you provide us with information about your child in relation to your Flying Blue membership. For example, if you create a family account.

2.3 Specific services, mobile apps, events, contests or campaigns

For specific services, mobile apps, events, contests or campaigns, we may collect other types of data than those described in this privacy policy. We will inform you about this when you register for the service, event, contest, or campaign, or when you download the app.

3. How we collect your data

We collect the categories of personal data referred to above in the following ways:

(A) Personal data provided by you

For example, when you register for our loyalty programme, contact our customer

support, subscribe to receive our e-mails, fill out a customer survey, register for one of our events or participate in a promotional contest.

(B) Personal data collected when you earn or spend Miles with us

When you book a flight or purchase ancillaries with Air France or KLM, you can earn or spend Miles. Air France and KLM share the booking details collected as part of their airline booking procedures (see 2.1 (B) above) so as to take care of your membership in our Flying Blue loyalty programme (see 4.1 (B) below).

(C) Personal data received from partners that participate in our loyalty programmes

The Flying Blue loyalty programme is offered by KLM and Air France (see 1 'Who we are' above). In a number of countries, we offer the Flying Blue programme in partnership with our participating airlines. Our loyalty programme allows you to earn and spend Miles and XP with us, participating airlines and other Flying Blue loyalty partners (including hotels and car rental companies). We may share your personal data with the participating airlines and our Flying Blue loyalty partners for that purpose. If, for example, you purchase a service from one of our loyalty partners, they will share the Miles you have earned with us so that we can update your Miles balance. You can find a list of participating airlines and loyalty partners on our Flying Blue website. They are independently responsible for processing your personal data. You can find more information on how they handle your personal data in their respective privacy policies.

(D) If you use social networks, we may also receive information from your social network provider

For more information, see 2.1(E) above.

4. Purposes for which we use your personal data

4.1. General

The main purposes for which we use your personal data are:

(A) To take care of your membership in our loyalty programme

We process the personal data under 2.1 (A) and (C) to enrol you in our Flying Blue programme, to maintain your membership, to administer the Miles and XP that you earn and spend, manage your tier, and to provide you with rewards.

(B) To provide you with our online services and mobile apps and a

seamless digital experience

- i. To offer you the best possible digital experience, we may analyse your use of our website or apps, so that we can tailor our communication towards the digital channel or device that you use most (please see 2.1 (D)).
- ii. Some of our digital services may use your location, for example, to show you the nearest location of interest.

(C) For statistical research

- i. General: We research general trends in the use of our Flying Blue loyalty programme, websites, mobile apps and social media, and trends in the behaviour and preferences of our members. We use our research results to improve our loyalty programme, develop better services and offers for our customers, provide better customer service, and improve the design and content of our websites and mobile apps.
- ii. Categories of data: To perform our research, we may use the categories of personal data described at 2.1 (A) to (E). We only use 'aggregated data' or 'pseudonymised data' for our research. This is data that cannot be traced back directly to you because all directly identifiable elements (e.g. names and e-mail addresses) are removed or encoded and given a number. We take appropriate measures to ensure that only a limited group of employees has access to the analyses.
- iii. Legal basis and right to object: We process your personal data for our legitimate interests described above (please see (i) 'General'). You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data for statistical research (please see 8 'Your rights' below).

(D) For marketing purposes

- i. General: If you become a member of our Flying Blue loyalty programme and subscribe to Flying Blue updates, we will send you updates about our programme and personal advertisements and offers for our products and services and those of our participating airlines and loyalty partners (see (v) below).
- ii. Types of communication:
 - E-mails: If you subscribe to our Flying Blue updates, we will send you email updates about your membership (such as your Miles overview), news about our programme (such as our newsletter) and offers tailored to your interests and preferences. These Flying Blue offers may relate to our loyalty programme (such as promo awards), products and services of Air France, KLM or participating airlines (such as earning or spending Miles with us or participating airlines) and the products and services of our Flying Blue partners (such as earning or spending Miles with hotels, rental cars, shopping

and lifestyle partners). For more information on participating airlines and Flying Blue partners, see 3.1 (C) above.

– Airline updates: When you become a Flying Blue member, you may subscribe to airline updates by email or via social media. Please see the Air France and KLM privacy policies for more information about our airline updates. The Flying Blue programme is offered by Air France and KLM in cooperation with our participating airlines (see 3.1 (C) above), which include Kenya Airways, Aircalin, Tarom, and Transavia. If you reside in a country where these participating airlines operate or if you enrol in our Flying Blue programme via their websites, Air France and KLM may also send you e-mails with offers for and updates about their services if you have subscribed to airline updates. For example, if you reside in Romania, you may receive an email from us with news and offers from Tarom.

– Direct messages through other communication channels: We may use other communication channels to send you direct messages with personalised advertisements and special offers, such as postal mail or, with your consent, mobile push notifications or social channels (e.g. Messenger, WhatsApp, or WeChat).

– Display relevant information and personalised advertisements on websites: please see our cookie statement. We may also use your personal data to exclude you from advertisements which are no longer relevant for you.

iv. Personalised advertisements and offers: We aim to make advertisements and offers as relevant as possible for you. To that end, we may use and combine the categories of personal data described at 2.1 and 4.1 (C) (statistical research data). For example, in our e-mails we may include a specific offer from a hotel partner based on your recent bookings with Air France or KLM.

v. Legal basis and right to object: We send you updates based on your consent. We personalise your advertisements and offers on the basis of our legitimate interest and the interests of third parties so as to send you relevant updates and offers. You have the right to object to the use of your personal data for direct marketing purposes at any time (please see 8 'Your rights' below).

vi. Unsubscribe: You may unsubscribe from our Flying Blue updates and participating airline emails at any time by clicking on the unsubscribe link in the e-mail. You will then unsubscribe from that particular type of email update. If you would like to unsubscribe from all types of Flying Blue updates or participating airline emails, you can change your communication preferences in your account. In that case, you will only receive e-mails necessary to be able to participate in our loyalty programme (e.g. request to update your password). You may also unsubscribe by contacting us (please see 8 'Your rights' below). For unsubscribing from the Air France and KLM airline emails,

please see the Air France and KLM privacy policies.

(E) To communicate with you

We use your contact details to communicate with you about your membership, to answer your questions, or to address your complaints.

(F) To conduct our business operations or to comply with statutory obligations

We collect, use, and retain your personal data to perform and administer our loyalty programme, such as for record-keeping purposes, to prevent or combat fraud, or to settle disputes. In the case of fraud or misuse of our loyalty programme, we may enter your personal data in our internal airline fraud control and warning systems. As a result, your bookings may be subject to close scrutiny and, in particular cases, may be refused or cancelled or you may no longer be welcome onboard our aircraft or only on certain conditions. Please see our privacy policies for more information. In addition, we process your personal data to comply with our legal and tax obligations.

4.2. Specific services, apps, events, contests, or campaigns

For specific services, apps, events, contests, or campaigns, we may use your personal data for purposes other than those described in this privacy policy. We will inform you about those purposes when you register for the service, event, contest, or campaign, or when you download the relevant app.

4.3. Legal basis

We may process your personal data only if we have a legal basis for doing so. In many cases, we need your personal data to take care of your membership (see 4.1 (A)). In those cases, the legal basis for processing your data is 'necessary for the performance of a contract'. If you have consented to a processing activity (which consent you may withdraw at any time, please see 8 'Your rights' below), we will process your data based on that consent.

In certain cases, we may use your personal data if we or third parties have a legitimate interest in doing so. We will always consider all interests carefully: your interests, the interests of others, and the interests of Air France and KLM. Based on that legal basis, we will process your data for, for instance, combatting fraud, statistical research, or personalising offers and advertising (see 4.1 (C), (D) and (F) above for more information).

We may have a legal obligation to process your data, for example for tax reasons. If you refuse to provide the personal data we need to perform the

contract we have concluded with you or to comply with a legal obligation, we may not be able to provide all the services you have requested from us.

5. Granting access to or sharing data with third parties

5.1. General

We may share your personal data with third parties in the following cases:

(A) For our loyalty programmes and benefits

For more information, see 1 and 3.1 (B) and (C) above.

(B) For support or additional services

To operate our loyalty programme, we use support or additional services of third parties, such as IT suppliers, social media providers, marketing agencies, and screening service providers. All such third parties are required to adequately safeguard your personal data and only process them in accordance with our instructions.

5.2. Specific services, apps, events, contests, or campaigns

For specific services, apps, events, contests, or campaigns, we may share your data with third parties other than those described in this privacy policy, for example, when we organise a campaign or an event in collaboration with a Flying Blue partner. We will inform you about this when you register for the service, event, contest, or campaign, or when you download the app.

5.3. Third-party websites

Our website contain links to third-party websites. If you follow those links, you will leave our website. This privacy policy does not apply to the websites of third parties. For more information on how they handle your personal data, please check their privacy or cookie policies (if available).

6. Security and retention

6.1. Security

(A) Our commitment

Ensuring the security and confidentiality of your personal data is our priority. Taking into account the nature of your personal data and the risk of

processing, we have put in place all appropriate technical and organisational measures as required by applicable legal provisions (in particular Article 32 of the General Data Protection Regulation (GDPR)) so as to ensure an appropriate level of security and, in particular, to prevent any accidental or unlawful destruction, loss, alteration, disclosure, intrusion of or unauthorised access to these data.

(B) The security measures we have taken

(i) Banking transactions. We are required to comply with the Data Security Standard for the Payment Card Industry (the PCI DSS standard) issued by the PCI Security Standards Council (PCI SSC). This standard was created to increase control over cardholder information with the aim of reducing the fraudulent use of payment instruments. All Air France or KLM service providers required to process bank card data must comply with the PCI DSS standard. We strive to combat identity theft on the Internet. For this reason, we use, for example, a device for detecting fraudulent payments designed to protect you in the event of loss or theft of your bank card.

(ii) Organisational measures. We have implemented and maintain various organisational measures intended to strengthen the awareness and accountability of our employees. We have programmes in place designed both to ensure awareness and to promote the sharing of good practices and safety standards. In this context, a rich collection of documents on information security challenges and privacy protection have been made available to employees.

(iii) Technical measures. We strictly control physical and logical access to internal servers hosting or processing your personal data. We protect our network with state-of-the-art hardware devices (Firewall, IDS, DLP etc.) as well as architectures (including secure protocols like TLS 1.2) in order to prevent and limit the risk of cybercrime.

(B) The evolution of our security systems

In order to maintain an appropriate level of security, we have internal processes in place based on the best standards (in particular, the ISO 27000 family of standards). We rely on dedicated experts to guarantee the best possible level of protection. In this regard, Air France maintains a privileged relationship with l'ANSSI (*Agence Nationale de Sécurité des Systèmes d'Information*) and KLM with NCSC (National Cyber Security Centre).

(D) How to protect yourself

The personal data security and confidentiality data depends on everyone's best practices. We advise you not to disclose the passwords you use to access our services to third parties, to log out of your profile and social account systematically (especially in the case of linked accounts), and to close the browser window at the end of your session, especially if you are accessing the Internet from a public computer. This will prevent other users from accessing your personal data. To avoid the risk of hacking, we recommend using different passwords for every online service you use. We cannot be held responsible for theft of your data on a platform which is not managed by us.

In addition, we strongly recommend that you do not distribute to third parties any document issued by Air France or KLM containing your personal data or other information related to your membership or to publish these on social networks. If you decide to publish these documents on social media, you are responsible for consulting and understanding the general conditions of use, information security practices and privacy policies applicable to these third-party social networks. We cannot be held responsible for how data is processed, stored or disclosed on these platforms.

To find out more about our measures with regard IT security, please consult Air France's or KLM's IT security portal.

(E) Management of security incidents

There is no such thing as 'zero risk' and even if we implement all the security measures recognised as appropriate, unforeseen things can happen. We have specific procedures and resources in place to manage security incidents under the best possible conditions.

We have also set up a specific procedure for assessing possible breaches of security that could lead to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to your personal data, for notifying the competent supervisory authority within the period provided for by applicable law, and for warning you when a breach is likely to result in a high risk to your rights and freedoms. Tests are carried out periodically to verify the functioning of the security installations and adequacy of the procedures and devices deployed.

6.2. Retention

We do not keep your personal data for any longer than is necessary. How long your personal data is retained depends on the purposes for which the data is processed and the applicable statutory retention periods.

7. International transfer of data

7.1. KLM and Air France may transfer your personal data to countries other than your country of residence (including countries outside the European Economic Area). This is done because our participating airlines, Flying Blue partners or service providers provide their services from other countries. You can find a list of participating airlines and our loyalty partners on our Flying Blue website. The laws of the countries to which we transfer your personal data may not always offer the same level of personal data protection.

7.2. KLM and Air France will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws. For transfers of personal data outside the European Economic Area, KLM and Air France may use European Commission-approved Standard Contractual Clauses as safeguards.

8. Your rights

8.1. You may contact Air France's or KLM's Privacy Office (please see 8.4 below) to exercise any of the rights you are granted under applicable data protection laws, including (A) the right to access your data, (B) to rectify your data, (C) to erase your data, (D) to restrict the processing of your data, (E) the right to data portability, and (F) the right to object to processing.

(A) Right to access

You may ask us whether we process any of your personal data and, if so, to receive access to that data in the form of a copy.

(B) Right to rectification

You have the right to have your data rectified if it is inaccurate or incomplete. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

(C) Right to erasure

You have the right to have your personal data erased. This means that we will delete your data. Erasure of your personal data only takes place in

certain cases, as prescribed by law and listed in Article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data is no longer necessary in relation to the purposes for which it was originally processed, and situations where the data was processed unlawfully. Due to the way in which we maintain certain services, it may take some time before backup copies are erased.

(D) Right to restriction of processing

You have the right to obtain a restriction on the processing of your personal data. This means that we will suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data is contested and we need some time to verify its (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

(E) Right to data portability

Your right to data portability entails that you may ask us to provide you with your personal data in a structured, commonly used and machine-readable format, and have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, we will transmit your personal data directly to the other controller.

(F) Right to object

You have the right to object to the processing of your personal data. This means that you may ask us to no longer process your personal data. This only applies if the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see 4.3 'Legal basis' above). You can object to direct marketing at any time and at no cost to you if your personal data is processed for this purpose, which includes profiling to the extent that it is related to direct marketing. If you exercise this right, we will no longer process your personal data for such purposes.

8.2. Withdrawal of consent

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent. For example, you can withdraw consent by clicking the unsubscribe link in the e-mail or adjusting your communication preferences in your account (if available).

You can also contact Air France's or KLM's Privacy Office. For more information on how you can withdraw your consent for cookies and similar

technologies we use when you use our website, please check our cookie policy.

8.3. Denial or restriction of rights

There may be situations where we are entitled to deny or restrict your rights as described in 8.2 above. In all cases, we will carefully assess whether such an exemption applies and inform you accordingly. We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals, or refuse to delete your personal data if the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply if the personal data was not provided by you or if we process the data on grounds other than your consent or for the performance of a contract.

8.4. Privacy Office

If you wish to exercise your rights, all you have to do is send a request to Air France's or KLM's Privacy Office:

Air France

Délégué à la Protection des Données / Data Protection Officer - ST.AJ IL
45, rue de Paris 95747 Roissy CDG Cedex

France

E-mail: mail.data.protection@airfrance.fr

KLM Royal Dutch Airlines

Privacy Office - AMSPI

PO Box 7700

NL-1117 ZL Luchthaven Schiphol

The Netherlands

E-mail: KLMPrivacyOffice@klm.com

8.5. Questions, comments or complaints

If you have any questions, comments or complaints, please feel free to contact us. If your concerns have not been addressed to your satisfaction, you have the right to file a complaint with the competent supervisory authority. In France, the French Data Protection Authority (*Commission Nationale de l'Informatique et des Libertés*) is responsible for monitoring compliance with privacy regulations. In the Netherlands, the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) is responsible for monitoring compliance with privacy regulations.

9. How this privacy policy is updated

9.1. This privacy policy took effect on 20 August 2020. It is amended from time to time. We will notify you of any changes before they take effect.