

Air Canada Privacy Office
Air Canada Centre
Law Branch, ZIP YUL 1276
PO Box 7000, Station Airport
Dorval, Quebec, Canada H4Y 1H4
privacy\_vieprivee@aircanada.ca>

Mr. Edward Hasbrouck 1130 Treat Avenue San Francisco, California United States of America 94110

#### Re: Request for Access to Personal Information

Dear Mr. Hasbrouck

This is in response to your Request for Access to Personal Information (the "Request") received by our Privacy Office on September 26, 2012. For ease of reference, we will address each request separately. However, we wish to inform you that Air Canada is not in a position to provide you with all the requested information, for the reasons explained below.

In order to ensure the protection of your privacy, Air Canada will not send the requested documentation by email but rather by FedEx at the address mentioned in your Request.

#### 1) Airline hosting and travel agency Passenger Name Records (PNR's)

Please refer to Attachment 1, which contains your PNR for the October 14, 2011 flights.

Please note that the Air Canada reservation system is not set up to query by name of passenger alone. Indeed, the system was built in the 1970s and implemented in the 1980s. It is not "Web based" and it is in a "native" format.

In order to query, we need to do a search by individual date and then by name. Moreover, separate searches need to be made for Air Canada and Jazz Air LP.

Finally, please note that Air Canada is not in a position to provide you with your PNR for the October 29, 2011 flights referred to as "LX4245" and "LX38". In this reservation record, no mention was made of any flight operated by another airline such as Swiss International Airlines (airline code LX). It may be that your travel agent sent the reservation for these flights directly to Swiss' reservation system.

Air Canada does not have access to the file held at the travel agency nor do we have access to the file held at Swiss. We suggest you address your queries directly to them.



#### 2) PNR histories

For the reasons explained above, Air Canada is not in a position to provide you with additional PNR histories for flights not listed in your Request.

#### 3) Cancelled PNR's and their histories

Air Canada does not have any records of cancelled PNR's related to you.

#### 4) Archived or "purged" PNR's and their histories

Please refer to Attachment 2, which contains your "Purged E-Ticket" for the October 14 and October 29, 2011 flights.

5) System logs of access to these PNR's and PNR histories, including any records of retrieval or other access to my PNR or other data by airline or CRS offices or travel agencies, and including records of what data was accessed, by whom, when, and from where (including whether such access was made from outside Germany or the EU)

Please note that the system used by Air Canada does not track consultations of a PNR record. Only accesses resulting in a transaction are recorded.

#### 6) Departure control system records and access logs

You will find enclosed as <u>Attachment 3</u> a copy of the Departure Control System Records (DCS records) for the 2 Air Canada flights mentioned in your Request.

Your reservation was built in a Global Distribution System ("GDS"), namely an "Amadeus" System, to which your travel agent (Airtrade International Inc.) subscribed.

This GDS "speaks" to the reservation systems of airlines. Through the system, a booking for you was made for flight AC7687 of October 14, 2011 (this flight was operated by Jazz Air LP hence the reference in the record as "QK7687") and flight AC832 on the same day. A reservation record was made in Air Canada's reservation system on September 19, 2011 at 15:42 GMT. This record is referred to as a Passenger Name Record ("PNR"). Please refer to Attachment 1.

With respect to your October 29, 2011 flights referred to as "LX4245" and "LX38": as mentioned herein, Air Canada does not have access to the file held at the travel agency nor do we have access to the file held at Swiss.

It is further important to mention that IATA accredited travel agents are allowed to use the ticket stock of <u>any</u> airline involved in the travel industry. In the present situation, Air

Canada ticket stock (commencing with the code 014) was used. We see in the October 14, 2011 PNR that ticket 0148709665035 and associated ticket 0148709665036 were issued. As well, a reference to your United Air Lines frequent flyer membership was made (UA00168716753).

Finally, as mentioned above, the system used by Air Canada does not track consultations of PNR or of DCS records. Only accesses resulting in a transaction are recorded.

#### 7) Advance Passenger Information (API) records and logs

Please take note that Air Canada transmits APIs information only to countries it flies to or from and that require it.

More particularly, Canada does not require Advanced Passenger Information for flights departing Canada and Belgium does not require it for flights landing in this country. Hence Air Canada is not in a position to provide you with APIs records and logs for the flights listed in your Request since no such APIs records were created.

#### 8) AIRIMP, EDIFACT, or other message records

Unfortunately, any messages such as Edifact, are not kept as archives.

### 9) Ticketing records including complete virtual coupon records or ticket images

Please refer to a copy of the electronic tickets (<u>Attachment 4</u>). This document notably shows that two (2) segments appear for travel on Swiss.

We further refer you to Attachment 2, a copy of your purged E-Ticket.

## 10) Bank Settlement Plan (BSP), Airline Reporting Corporation (ARC), interline, or other settlement records

Unfortunately, Air Canada will not provide you with the requested information. Indeed, these records are not personalized to passenger name but by ticket number; hence they are not personal information as per PIPEDA.

### 11) Credit card processing, financial, billing, or payment records

As appears from the attached purged E-Ticket (Attachment 2), a credit payment was made with a tampered credit card number; however we do not have the name of the cardholder. Air Canada was unable to find additional credit card information with respect to the flights mentioned in your Request.

#### 12) Frequent flyer account records

Please refer to a copy of your Aeroplan record (<u>Attachment 5</u>), which was created on April 10, 2007 and expired on April 15, 2008. We have no further information with respect to your Aeroplan record.

In addition, Air Canada does not have access to your United Air Lines frequent flyer record. We suggest you address your queries directly to them.

### 13) Customer, Web user, or traveler records or profiles

We refer you to the information contained in your PNR, Attachments 1. As mentioned above, your October 14, 2011 travel was not booked through the Web or an airline-owned CRS, but rather through a GDS. The Historical PNR that we are attaching constitutes the only one we were able to locate with the information at hand.

Finally, we reiterate that Air Canada does not have access to the passengers' records held at travel agencies, which are independent from Air Canada.

14) Web site visitor, usage, and query records and logs, including all records of which or my PNR, profile, or other personal data was accessed via airline, CRS, or travel agency Web sites (including via online reservation management, check-in, or PNR-viewing sites, and including but not limited to VirtuallyThere.com, ViewTrip.com, MyTripAndMore.com, and/or CheckMyTrip.com), including by whom, when, and from where (including whether such access was made from outside Canada).

We refer you to our response under point 13.

Please note that Air Canada does not have any further personal information related to you with respect to the flights listed in your Request. Furthermore, Air Canada does not have access to your personal information collected and/or held by independent third parties, including but without limiting to travel agencies, airlines, governments agencies<sup>1</sup> and code-shares.

Finally, as requested we refer you to Air Canada's Privacy Protection Policy, <u>Attachment 6</u>. This policy is also available through the Air Canada website at:

### http://www.aircanada.com/en/about/legal/privacy/policy.html

We trust the above to be satisfactory and we invite you to contact us should you require any further clarification.

<sup>&</sup>lt;sup>1</sup> We reiterate that your personal information was not disclosed to a government agency with respect to the flights mentioned in your Request, since Canada does not require Advanced Passenger Information for flights departing Canada and Belgium does not require it for flights landing in this country.

Sincerely,

Privacy Office - Air Canada Law Branch

Marie-Christine Lauzon Avocate | Counsel

Air Canada

Droit du travail et de l'emploi | Labour and Employment Law

Encl.



### Display a PNR

### Back

#### **PNR Detail**

-01.\*\*\*1HASBROUCK/EDWARDJMR\*\*\*

- 1-MUC1A2H4650/SJC1S212D/0554
- 7-K19SEPMUC1A 0148709665035-36
- 4-SSRAUTHAC HK/PSGI/MUC1A//19SEP1 NZXEJA0001
- 4-SSRFQTVACHK/ UA00168716753
- 4-SSRRQSTACHK1 3F/N
- 4-SSRRQSTACHK1 31K/N
- 4-SSRDOCSYYHK1 /P/US/212838038/US/11JAN60/M/23FEB15//EDWARD
- 4-SSRDOCAYYHK1 /R/US
- 3-OSIYY CTCT SJC 650 428-0700 AIRTRADE INTERNATIONAL INC.
- M-A-/SJC1S212@
- 140CT 1 QK7687KY
- BOSYUL D HK 1
- 1645 1752

- 2 AC0832KY
- 140CT
- YULBRU U HK 1
- 1945
- 0835

MUC/1A/RM 19SEP 1542 ORIGIN

**Блесже Сопшана** 

Logout Module Index

#### **Execute Command**

#### Purged E-Ticket

Output from command ...

index: 036

/vol.acwc/FS05fs7/ETKT/temp/levreac.0148709665036: No such file or directory

CONJUNCTIVE BOOK 2 OF 2

NAME: HASBROUCK/EDWARDJMR

TKT: 014 87 09665036 2 PRG

BEFFA: D3115EC9

FF:UA00168716753

REF: 2H4650/1A

CP CR FLT CL DATE BRD OFF TIME ST FARE BASIS BGA

1. X LX 38 H 290CT11 ZRH SFO 1315 OK HKW2RCE

NVB:1/290CT11 2/

NVA:1/290CT11 2/ 3/

4/

FR: USD 878.00 TX: YQ 420.00 TX: YC 5.50 TX: XT

107.79

TL: USD 1411.29

FARE CALCULATION

BOS AC X/YMQ AC BRU150.00KKWNC22S /-LJU LX X/ZRH LX SF0728.00

HKW2RCE NUC878.00END ROE1.000000XF BOS4.5

FOP: CC CA546604xxxxxx7172\*1411.29 APC: 06680Z

END: NONREF/0VALUAFTDPT/CHGFEE

05542353/19SEP11/AIRTRADE INTERN/

MOUNTAIN VIEW CA 9404

CONJUNCTIVE BOOK 2 OF 2

CONJUNCTIVE BOOK 2 OF 2

CP ACTION OLD

CR FLT CL DATE BRD OFF NEW

1 ISSUED

LX 0038 H 290CT11 ZRH SF0

19SEP11 19:52Z 1A 043039 05542353 A0001AASU

OLD CP ACTION

CR FLT CL DATE NEW

1 CONTROL

LX 0038 H 290CT11 ZRH SF0 A/LX

AC SYS

19SEP11 19:52Z

CP ACTION

OLD NEW CR FLT CL DATE BRD OFF

1 UPDATE \*\*USAGE DETAILS \*\*\*\*\*

A/LX USED LX 0038 H 290CT11 ZRH SFO LX 0038 H 290CT11 ZRH SFO HASBROU|E

SAC- 7240034114412

290CT11 17:57Z

CP ACTION

LX

72400000 SYSTEM

OLD

CR FLT CL DATE BRD OFF

NEW

1 LIFTED USED USED LX 0038 H 290CT11 ZRH SFO

SAC- 7240034114412

DBMAINT 000000

300CT11 01:10Z

PURGED: 31DEC11

CONJUNCTIVE BOOK 2 OF 2

**X** <-

Return to commands

DAWGE COMMISSIO

Logout Module Index

#### **Execute Command**

#### Purged E-Ticket

Output from command ...

index: 035

/vol.acwc/FS05fs7/ETKT/temp/levreac.0148709665035: No such file or directory

CONJUNCTIVE BOOK 1 OF 2

NAME: HASBROUCK/EDWARDJMR

TKT: 014 87 09665035 1 PRG

BEFFA: D3115EC9

FF:UA00168716753

REF: 2H4650/1A

CR FLT CL DATE BRD OFF TIME ST FARE BASIS BGA

AC 7687 K 140CT11 BOS YUL 1645 OK KKWNC22S 1PC PUSED

2. X AC 832 K 140CT11 YUL BRU 1945 OK KKWNC22S 1PC PUSED

1PC PUSED LX 4245 H 290CT11 LJU ZRH 0745 OK HKW2RCE

NVB:1/140CT11 2/140CT11

4/290CT11

NVA:1/140CT11 2/140CT11 3/

4/290CT11

t

FR: USD 878.00 TX: YQ 420.00 TX: YC 5.50 TX: XT 107.79

EQ:

TL: USD 1411.29

FARE CALCULATION

BOS AC X/YMQ AC BRU150.00KKWNC22S /-LJU LX X/ZRH LX SF0728.00

HKW2RCE NUC878.00END ROE1.000000XF BOS4.5

FOP: CC CA546604xxxxxx7172\*1411.29 APC: 06680Z

END: NONREF/ØVALUAFTDPT/CHGFEE

05542353/19SEP11/AIRTRADE INTERN/

MOUNTAIN VIEW CA 9404

CONJUNCTIVE BOOK 1 OF 2

CONJUNCTIVE BOOK 1 OF 2

BRD OFF CR FLT CL DATE OLD NEW CP ACTION

AC 7687 K 140CT11 BOS YUL 1 ISSUED AC 0832 K 140CT11 YUL BRU

2 ISSUED **ARNK** 3 ISSUED

LX 4245 H 290CT11 LJU ZRH

1A 043039 05542353 A0001AASU 19SEP11 19:52Z

CR FLT CL DATE BRD OFF NEW OLD CP ACTION

CKIN AC 7687 K 140CT11 BOS YUL 1 CHECK IN

AC 7687 Y 140CT11 BOS YUL HASBROU|E \*\*USAGE DETAILS \*\*\*\*\*

A200304 E91BE2 BOS PD 140CT11 18:49Z

CR FLT CL DATE BRD OFF NEW QLD CP ACTION

```
AC 0832 K 140CT11 YUL BRU
2 CHECK IN
                 CKIN
**USAGE DETAILS ****** AC 0832 Y 140CT11 YUL BRU HASBROU|E
A200304 E91BE2 BOS PD 140CT11 18:49Z
                        CR FLT CL DATE
                                        BRD OFF
                  NEW
           OLD
CP ACTION
                  CKIN AC 7687 K 140CT11 BOS YUL
1 DEPARTED CKIN
A006140 E91BF6 BOS PD 140CT11 22:04Z
                        CR FLT CL DATE
          OLD
                                         BRD OFF
                  NEW
CP ACTION
                  CKIN AC 7687 K 140CT11 BOS YUL
1 DEPARTED CKIN
A015583 E701DC BOS PD 140CT11 23:02Z
                        CR FLT CL DATE BRD OFF
                  NEW
CP ACTION
          OLD
                  CKIN AC 0832 K 140CT11 YUL BRU
 2 DEPARTED CKIN
A084675 E212BA YUL RA 140CT11 23:50Z
                         CR FLT CL DATE
                                         BRD OFF
                  NEW
           OLD
CP ACTION
                        AC 7687 K 140CT11 BOS YUL
                  USED
            CKIN
 1 LIFTED
                  USED AC 0832 K 140CT11 YUL BRU
          CKIN
 2 LIFTED
                     160CT11 01:19Z
DBMAINT 000000
                         CR FLT CL DATE BRD OFF
CP ACTION OLD
                  NEW
                         LX 4245 H 290CT11 LJU ZRH
                  A/JP
 4 CONTROL
                             280CT11 05:49Z
                   ETS
JΡ
                        CR FLT CL DATE
                                         BRD OFF
          OLD NEW
A/JP USED
CP ACTION
                       LX 4245 H 290CT11 LJU ZRH
 4 UPDATE
                         LX 4245 H 290CT11 LJU ZRH HASBROU|E
 **USAGE DETAILS *****
  SAC- 1650034108229
                             290CT11 07:26Z
                  ETS
 JP
                       CR FLT CL DATE BRD OFF
            OLD
                  NEW
 CP ACTION
           USED USED LX 4245 H 290CT11 LJU ZRH
 4 LIFTED
   SAC- 1650034108229
 DBMAINT 000000
                 300CT11 01:10Z
```

PURGED: 31DEC11

**X** <-

CONJUNCTIVE BOOK 1 OF 2

Return to commands

#### DCS record Edward HASBROUCK

```
QK7687 140CT11 BOS 1645/1815 CRJA1
HASBROUCK/EDWARDJ MR ** Electronic Ticket **
YUL Y/K C **03F 1 NZXEJA Checked-in:E91BE2/BOS 140CT 18:49Z
Security Number: 031A
Connecting Flight Details
1. AC0832 Y 140CT YUL-BRU @
Electronic Ticket Number: 0148709665035
FQTV - UA/ 00168716753
History Credits
140CT/1849Z BOS E91BE2-RS BTP
140CT/2202Z BOS E91BF6-SL PASSENGER BOARDED
APIS Data DOB:11JAN1960 NAT: PPT:
Tag Details: AC 339631 BRU
APP/ETA Status: 4111 OK TO TRAVEL
Passport First Name: EDWARD

AC0832 140CT11 YYZ 1700/1710 763W1
HASBROUCK/EDWARDJ MR ** Electronic Ticket **
BRU Y/K C @*31K 1 NZXEJA Checked-in:E91BE2/BOS 140CT 18:49Z
Security Number: 243A
Inbound Flight: QK7687 Y 140CT BOS 1752
Electronic Ticket Number: 0148709665035
FQTV - UA/ 00168716753
History Credits
140CT/1849Z BOS E91BE2-RS BTP
140CT/2346Z YUL E212BA-P3 PASSENGER BOARDED
APIS Data DOB:11JAN1960 NAT: PPT:
Tag Details: AC 339631 BRU
Passport First Name: EDWARD
```

Ing Stats	Ne	A.	<u>J</u>	_	Prev	لـــ	<u></u>	nlarge	<u> </u>	Prid	it 1	1
Electronic Ticket AIR CANADA	709 709	665035/36				8709		Belletining				
NONREF/OVALUAFTDPT/CHGFEE	DATE OF ESLE BOOKING P			Personal CE		AIRTRADE						
HASBROUCK/EDWARD I	WEST-WELF	А			EXCLUSIVE FOR		MOUNTAIN VIEW, CA 0554235 ELPE					
X MONTREAL/YUL		2687	K K	140ct11 140ct11	16: 45: 00 19: 45: 00	OK OK	KKWNC225	SER SERVICE SERVICE	19Sep11 19Sep11	195ep12 195ep12	ALOW	
BRUSSELS/BRU Lyubl tana/lyu	LX Z	245	н	290ct11		OK	HKW2RCE		19Sep11	195ep12		
ZÛRICH/ZRH		< WNC 229	5 /-		ZRH LX SF		OOHKW2RCE N	UC878, 00E	END ROE1, O	00000XT16.	3005	
XF 4.50 YO 420.00												
XT 108, 79 CA5466XXXXXXXX7172	1PC1PC	1PC PORM		275/41, HAMIE		ar I ci	/ I consumos	06680	Z TOUR COD	COMM RATE		
⊙ <b>01</b>	14	8709	96	65035	1	90 5	0.00			0.00		
790/6262185727	DO NOT MARK	OR WHERE IN	THE W	SACON ABOVE TITM								
Done.										Imag	e Info	

<u>In</u>	g Stats	ليسب	Next	_	Prev			nlarge		Pri	nt
Electronic Ticket	AIR C	ANADA	PMYO	148709665035				8709	665036		
NONREF/OVALUAFTI		K	OT THE STEWART TO	19Sep11	2H469	DESTRUCTION O TEXTED BOX 15 EXCHANGE F	ort.	1975 WE	E INTL INC ST EL CAMI N VIEW, CA		
XX ZÜRICH/ZRH		CARTEST IX	10038	A   290ct11	13: 15: 00	STATES OK	HKW2RCE	0554235 000000000	19Sep11	ELPE HOT VALO ATION 195ep12	ALOW
SAN FRANCISC	O/SFO										
none 0,00	PARE CALCULATION		DO PAYMENT DES LIMITER OF MONT		2	1PC	OFFECE ALLOWED				
TAX											
TOTAL PARTE USD 533, 29	FORM OF FAUNDAT	CPN ARUNE CODE	PORTE	204 NMB	1	790 CH	COMMESSON 0,00	APPROMA TAX	Coope Tours co	COMM TATE	
790/62621	85727	<ul><li>⊙ 014</li><li>∞ нот м</li></ul>	77.7	9665036	2						
4										7	ge Info

AIR CANADA - DIRECT MARKETING SYSTEM 2012-11-07 20:55:12 Customer Club Profile

Creation Date 2007-04-10 Cust # 783150527 + Status A + Gender M Lang E M#

MR EDWARD HASBROUCK

415 8248562 H Phone

1130 TREAT AVE.

SAN FRANCISCO CA 94110

B Phone 415 8240214

USA

Fax

1 + 1AE

AEROPLAN PROFILE CP Id # Tier 12 A + Tier 13

Subtier 50 + Dist Id

+ Audience +? Enroll Date 2007-04-10

Status E + H + TID

Exp Dte 2008-04-15 End Date 2008-04-15

Rep Name

Balance

? PIN + Password

Message

+ Dtls to Rpt

Lst Stmt Sent 2008-04-01

S-Miles 12 S-Segmt 12

Part Ref

Last Comm

+ First Act Rul

Lst Flight Stmt Lst NonAir Stmt

Privacy + ? ANI

More Privacy Ind N

Email edward@hasbrouck.org

F1=HELP F3=EXIT F4=PROMPT F6=CHAIN F11=AC/CP F17=MI DTLS

#### AIR CANADA 🏶

#### Privacy Policy

#### Air Canada's Privacy Protection Policy

We understand the importance of protecting the personal information of our customers and our employees. To earn and maintain your trust we have designed our policy to meet or exceed the requirements of the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and the ten principles set forth in the Canadian National Standard for the Protection of Personal Information. In addition, we are constantly looking for new and better ways to secure your personal information and to ensure that it is used in a responsible and respectful manner.



Air Canada has been awarded TRUSTe's Privacy Seal signifying that this privacy policy and practices have been reviewed by TRUSTe for compliance with TRUSTe's program requirements including transparency, accountability and choice regarding the collection and use of your personal information. The TRUSTe program does not cover information that may be collected through downloadable software. TRUSTe's mission, as an independent third party, is to accelerate online trust among consumers and organizations globally through its leading privacy trustmark and innovative trust solutions. If you have questions or complaints regarding our privacy policy or practices, you should first contact Air Canada's Privacy Office as follows:

Air Canada Privacy Office Air Canada Centre Law Branch ZIP YUL 1276 7373 Cote Vertu West 7373 Cote Vertu West
St. Laurent, Quebec H4Y 1H4
Telephone: (514) 422-6020
Facsimile: (514) 422-2641
Email: privacy\_vieprivee@aircanada.ca

If you are not satisfied with our response you can contact TRUSTe.

#### Accountability

Air Canada has a Privacy Office that is responsible for ensuring compliance with the requirements of PIPEDA. Should you have any questions regarding this policy or concerns with respect to Air Canada's compliance with the requirements of PIPEDA, you may contact contact the <u>Air Canada</u> Privacy Office at the above address.

Identifying Purpose of Collection
When you purchase airline tickets or make a flight booking for yourself or someone else by contacting Air Canada reservations, by going to an IATA accredited travel agency, or by booking directly online you will be required to provide certain personal information to complete your transaction. This may include name, address, telephone number, payment card number and expiry date. The information is required to identify you, in order to contact you, if necessary and to complete the process of your purchase. We also request your gender to assist in estimating the aircraft's total load and as an additional identifier.

If you request a customized service we may also need to collect additional personal information as described below.

Special Meals

On some of Air Canada's flights special meals to accommodate a range of dietary requirements are available. Availability must be determined at the time you book your flight. If you are able to make such a request the information must be recorded in your travel booking. This information is then transferred to the applicable catering service as well as the flight crew. In certain airports the ground handling is outsourced to another airline. In that case, we would need to transfer your information to the handling airline. If your travel includes a transfer from Air Canada to another airline your special meal request will be transferred where the service is available.

Special Offers or Discounts

Air Canada offers special discounts to infants and children. To assess your fare eligibility and ensure that your ticket is correctly processed we need to record the passenger's date of birth at the time of booking. At the airport, for verification, you are required to present personal identification with the date of birth of the passenger. If your travel includes a transfer from Air Canada to another airline your date of birth will also be transferred to that airline in order that you have fit from the discount. benefit from the discount.

#### Special Assistance

Special Assistance
We offer a range of travel services to <u>customers with special needs</u>. We also do our best to make your travel with us as comfortable as possible. Should you require special assistance such as the <u>use of a wheelchair</u>, or should you have a medical condition requiring the supply of <u>oxygen on board</u>, we need to record this information in your travel booking. In certain situations an Air Canada doctor will need to contact your personal physician in order to ensure that all necessary precautions for your safety and enjoyment are taken. This information will be forwarded to the airport staff as well as to the flight crew.

In certain airports we outsource the ground handling to another airline. When that is the case, we need to transfer the information to the handling airline. If your travel includes a transfer from Air Canada to another airline the requirement for special assistance may also be transferred so that the receiving airline can accommodate you as best as possible.

Safety is always a top priority at Air Canada. To assure the safety of our passengers and crew we need to know of any special requirements for assistance. This allows us to plan and reserve the seating arrangements to maximize safety.

Unaccompanied Minors

Children between the ages of eight and eleven may travel alone on Air Canada. However, the 
<u>Unaccompanied Minor</u> (UM) service is mandatory. The UM service includes provisions for your child 
to be escorted by Air Canada agents and/or flight attendants from the moment they arrive at 
airport check-in until they reach their final destination.

You must request the service at time of booking by calling <u>Air Canada Reservations</u>. Because of the additional security precautions necessary to protect your child, bookings for unaccompanied minors (8-11 years old) cannot be made online at aircanada.com.

Upon arrival at the airport, you will need to complete a "Request for Carriage" form. The

information on this form identifies your child and their flight itinerary, and includes the contact information of the person(s) meeting your child at final destination. You will also need to provide the contact information and authorizing signature of the parent/guardian authorizing the request for travel. This information is required in order to ensure the safety of your child.

Frequent Flyer Numbers

Frequent Flyer Numbers
As a customer of Air Canada you have the opportunity of accumulating points in one of a variety of frequent flyer programs. In order to automatically credit your account with these points the information needs to be forwarded to the administrator of the applicable frequent flyer program. This information includes time, date of flown segments, class of service and other personal information that may include: name, address and phone number, in order to identify you. To fulfill these requirements we need to register the frequent flyer program name and your frequent flyer purpose on your booking. number on your booking.

Aeroplan

Air Canada was one of the first airlines to use a customer loyalty program. By joining aircanada.com you automatically join Aeroplan. This program allows us to develop and recommend products and services based on an understanding of your interests and needs. Aeroplan enables our customers to accumulate miles for segments flown on Air Canada or for services or products purchased from participating Aeroplan partners. These miles are exchangeable for travel on Air Canada or on any of Aeroplan's partner airlines. To support this, the Air Canada Family\* and Aeroplan partners are required to exchange information in order to ensure that your Aeroplan account is maintained and that miles are credited and debited correctly. The information exchanged is limited to that which is required to fulfill the purpose. In addition, being an Aeroplan member makes it easier for you to book a flight. When you call Air Canada reservations and give your Aeroplan number, we can automatically transfer the information required to hold a flight booking from your Aeroplan account. Information such as your seating preference and choice of meal can be kept on your Aeroplan profile. To access your personal Aeroplan information on the Internet, we ask for your Aeroplan password. This is a security precaution to ensure that your information is safeguarded. You can request your password through the homepage of aircanada.com by clicking on 'Join now/Sign in' then 'Forgot/Need a password?'. password?'.

A cookie is a small non-executable file that is stored on your hard drive for the purpose of identifying your computer. While it is possible to make a booking at aircanada.com by having your browser's Internet security set such that it will not accept cookies your online experience may be greatly reduced.

Air Canada uses both session cookies and permanent cookies at aircanada.com. Session cookies are active only during the period you are logged on to aircanada.com website and are removed when you leave. They help us track the sections of the website that you use to allow us to make improvements in keeping with observed user preferences.

Permanent cookies remain on your hard drive until you remove them through your browser's Internet security settings. Permanent cookies are used to store user preferences such as preferred language and thus eliminate your having to make the same entries on each visit.

Our cookies are not tied to personally identifiable information.

This privacy statement covers the use of cookies by www.aircanada.com only and does not cover the use of cookies by any third parties. Some of our business partners (e.g., tracking utilities) use cookies on our site. We have no access to or control over these cookies.

We use local shared objects, also known as Flash cookies, to store your preferences such as volume control or high game score, or display content based upon what you view on our site to personalize your visit. Third Parties, with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity, use Flash cookies to collect and other left restricts. store information.

Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. Learn more about managing privacy and storage settings for Flash cookies.

Conversion Beacons

Air Canada also uses Conversion Beacons (small, simple snippet of HTML code) inserted in the source of the designated website pages. Conversion Beacon technology works by leveraging industry standard browser based cookie technology and simple standard html coding. Email recipients who receive a Conversion Beacon enabled email message will receive a small unique cookie that is stored in their browser session. This unique cookie is later used to connect the email recipient with the subsequent recipient activity on the client website.

The purpose of tracking the activity is to better understand the email flow of our subscribers and to measure the effectiveness of ads. For this reason our Conversion Beacons are tied to personally identifiable information (email address).

When you book your travel or join aircanada.com, you provide Air Canada with your implied consent to use your information to fulfill your request.

Air Canada email offers

When you book your travel at aircanada.com you are added to our email list that will be used to contact you occasionally with offers that we feel will be of interest to you. If you do not want Air Canada to contact you with offers you may withdraw your consent at any time simply by changing your profile information and opting out of any or all of the email offers you no longer wish to subscribe to by clicking on 'email offers' on the homepage. If you later change your mind it is just as simple to opt back in to the email offers of your choice. In addition, all emails sent to you by Air Canada contain simple instructions telling you how to "unsubscribe."

Some information is collected automatically every time you visit aircanada.com (e.g., cookies and conversion beacons).

If you opt in to one or more of Air Canada's email offers you are consenting to allow Air Canada to contact you regarding those offers.

You may withdraw your consent at any time simply by changing your profile information or by following the instructions on how to "unsubscribe" contained in all emails sent by Air Canada.

Third Party **Bookings, Changes to Bookings** and Air Canada Rewards for Business If a third party, including a family member, friend, or work colleague, seeks to make a booking on

your behalf, that party will be asked to provide us with the same personal information that we would normally collect from you directly in order to complete your transaction. Unless and until we are advised otherwise, we consider that such third party has your consent and authorization to provide us with your personal information and make bookings (and changes thereto) on your behalf in accordance with this privacy policy. Please note that the collection, use and disclosure of your personal information by a third party is subject to your dealings with them and any applicable privacy policies and practices they may have.

If a third party who has booked your current flight or other travel service 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 and allow such third party to make changes as we will conclude that you have given them your consent to do so. 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.

Please also note that if you make your booking through the Air Canada Rewards for Business loyalty program that your employer, travel arranger, and other parties may be able to access certain information with respect to your bookings and make changes thereto. For more information on the Air Canada Rewards for Business loyalty program, please consult the Air Canada Rewards for Business Questions and Answers.

Limiting Collection

Air Canada will limit the collection of personal information to that which is necessary to fulfill the purpose for which it was collected.

Air Canada uses contractual and other means to ensure that your personal information is afforded protection that meets the requirements of PIPEDA whenever a third party service provider is used to for research or survey purposes or to perform services on our behalf and that third party agent. Third party service providers may contact customers directly on our behalf to conduct research or surveys. Research and survey data is reported back to Air Canada as aggregated data with no reference to individual customers. These third parties may not use any personally identifiable information for their own marketing nurposes. information for their own marketing purposes.

In some cases, these third party service providers may be located outside Canada and may be required to disclose information to government authorities, regulators, courts, or law enforcement in those countries.

Customers who do not wish to be contacted for research or survey purposes should advise  $\underline{\mathbf{Air}}$ Canada's Privacy Office.

Limiting Use, Disclosure and Retention

Air Canada will not use or disclose your personal information for purposes other than those for which it was collected without your explicit consent or as required by law. You should understand that all airlines, including Air Canada, are required by new security laws in the U.S. and several other countries to give border control agencies access to passenger data. 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.

Customer information is retained for as long as necessary to fulfill the purposes for which it was

When you join aircanada.com you can ensure that the personal information we hold is accurate and up to date. You supply the information and if it should change, for example if your telephone number changes simply click on 'View/Update My Profile" and make the necessary changes.

Personal information is encrypted as it travels over the Internet. Depending on your web browser you may see a secure webpage indicator, for example a closed lock in the lower right hand corner you may see a secure webpage indicator, for example a closed lock in the lower right hand corner of the Internet Explorer browser.

The use of Secure Socket Layer protocol (SSL) allows all personal information such as your payment card number, to be encrypted as it travels from your computer to Air Canada's booking system. Once received, the information is unencrypted and processed in the same way as a payment card transaction placed via the telephone.

Air Canada's privacy practices are as outlined within this policy. Should you have any questions or comments you may contact the <u>Air Canada Privacy Office</u> at the address provided above.

**Individual Access**With certain limited exceptions as provided in the PIPEDA you have a right to access your personal information held by Air Canada. You may access your personal information held in your aircanada.com profile by clicking on 'View/Update My Profile' on the homepage or by contacting the <u>Air Canada Privacy Office</u> at the address provided above.

If you want access to your personal information on your travel booking through an Air Canada Call Centre you should have your booking reference number or your e-ticket number available to help us ensure that you are entitled to access the information.

If you have other queries you may contact the Air Canada Privacy Office at the address provided

If you have any concerns regarding Air Canada's compliance with the 10 principles of the PIPEDA you may address those concerns to the Air Canada Privacy Office at the address provided above. Complaints concerning Air Canada's compliance with PIPEDA are taken seriously and all semplaints are investigated. complaints are investigated.

Changes to the Privacy Policy
This policy takes effect on December 4, 2004 and was last updated on June 29, 2011. Air Canada
This policy takes effect on December 4, 2004 and was last updated on June 29, 2011. Air Canada
reserves the right to modify this privacy statement at any time, so please review it frequently. If
we make material changes to this policy we will notify you on our homepage and other places we
deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

st Air Canada's family includes Jazz Air Limited Partnership and their successors so long as their successors remain affiliated with Air Canada.