

Privacy Policy Air France KLM Quality Observer Panel

Last updated: 02/04/2019, version 4

1. Introduction

This privacy policy applies to all members of the Air France KLM Quality Observer Panel. This Panel is a respondent database of Air France KLM clients, managed by us, Kantar Netherlands B.V. (referred to as "Kantar", "we" or "us"). From time to time we send you invitations to participate in quality Observations for Air France and KLM.

Air France KLM¹ is the data controller of the data in our database (e.g. information about your flight details, your Flying Blue membership and your contact details). For the data collected in our surveys, Air France KLM is the data controller as well. Participation in this survey is entirely voluntary. We ask you to read this privacy policy carefully.

For the purpose of this Privacy Policy, the definition of 'personal data' is any information that relates to an identifiable living individual.

2. Lawful Collection and Use of Data

Kantar collects information in several ways from different parts of our site, our mobile application and other activities such as surveys. Examples of these activities are explained below and include:

Registration: some personal data is gathered when you register or provided by Air France KLM, such as name, email address, flight information, Flying Blue number and level.

Panel Surveys: personal data may also be collected from you when you participate in our survey, such as the use of the Quality Observer app.

In summary (we've provided more details below), the main purposes for which we use your personal data are to:

- Contact you for surveys via email or any other proposed communication options
- Select you for future surveys
- Include you in our prize draws
- Help you when you contact our helpdesk
- Allow us to reward you with the promised incentives
- Update, enrich and clean our panel members' data to improve our usage of data

We have set out below more detailed information about how we use your personal data. We are also required by law to explain the legal basis for processing your personal data. These legal bases are listed below and could be different for each use case:

- we have your consent for the use of your personal data
- we need to use your personal data in order to perform a contract with you
- we need to process your data to comply with a legal obligation
- we need to process your data in order to protect your vital interests or someone else
- the processing is necessary to perform a task in the public interest or
- the use of your personal data is necessary for our (or Air France KLM's) legitimate interests (in which case we will explain what those interests are).

We will never misrepresent ourselves or what we are doing. If you receive an email that concerns you, purporting to be from us, please let us know as shown below in '*How to Contact Us*'.

The main purpose for us to collecting your personal data is the Quality Observer Programme, a market research we conduct on behalf of Air France KLM. When we contact you, generally by email, we do so to invite you to participate in the Quality Observer Programme.

¹ Koninklijke Luchtvaart Maatschappij N.V. and Société Air France

Case	Purpose	Data collected/ processed
Market Research	To understand your personal opinions about Air France KLM's services and their conformity to quality standards.	Name, email address, opinion, Flying Blue level and number, flight details
Public Disclosure	To share or disclosed pursuant to judicial or other government subpoenas, warrants, orders or pursuant to similar and other legal or regulatory requirements, we will provide such information to the appropriate authorities.	Identifier, name, contact details, email address, incentive received.

When you participate in our survey, we may ask you for a range of information in connection with Air France KLM. You may decline to answer any questions or withdraw from participation in a study at any time.

3. Third Parties and Data Transfer Across Borders

You can be assured that we will protect your privacy. We will not make your personal data available to anyone without your agreement unless it is for research purposes only or if required by law. This includes your name and e-mail address.

Your personal data may be collected, stored, transferred or processed by our sister companies within the Kantar group, or third party service providers for research-related purposes, such as data processing, and fulfilment of prize draws or other incentives both within and outside the EEA. They are all contractually bound to keep any information they collect and disclose to us or, we collect and disclose to them, confidential and must protect it with security standards and practices that are equivalent to our own.

Where these transfers are across borders or outside the EEA we shall put safeguards in place to ensure the transfer is made by a legitimate method for the purposes of EU data protection law and secure.

4. Confidentiality, Security and Industry Requirements

We take appropriate technological and organisational measures to protect the personal data submitted to us, both during transmission and once we receive it. Our security procedures are consistent with generally accepted commercial standards used to protect personal data. Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we will take reasonable steps to ensure our systems are secure.

All our employees are contractually obliged to follow our policies and procedures regarding confidentiality, security and privacy.

We adhere to the following standards and industry requirements:

- MOA professional code of conduct;
- ISO 20252 international market research quality standard;
- ISO 9001 international standard for quality management systems;
- ISO 27001 international standard for data security;

5. Accuracy

We take all reasonable steps to keep personal data in our possession or control, which is used on an on-going basis, accurate, complete, current and relevant, based on the most recent information made available to us by you and/or by our client.

We rely on you to help us keep your personal data accurate, complete and current by answering our questions honestly and you are responsible for ensuring that the data controller (Air France KLM) is notified of any changes to your personal data.

6. Children's Data Collection

We recognize the need to provide further privacy protections with respect to personal data collected from children. We never knowingly invite children under the legal age set by the authorities in the country in which you reside to participate in research studies without parental permission. If it is necessary and appropriate to the Quality Observer Programme to directly involve children under the legal age, we take measures to ensure we have been given permission by their parent or legal guardian.

We will provide parents and guardians information about the survey topic, about any personal or sensitive information which may be collected from the children, the way this data will be used and whether and with whom we may share such information.

While the child is completing the survey, it is the responsibility of the parent or guardian to supervise them. In certain circumstances, we may require additional consent for public health, regulatory, or commercial reasons. We will explain this to you and the reasons for requiring it at the time we ask for it.

7. Rights of Individuals

To request access to personal data that we hold about you, you should submit your request in writing to the e-mail address or postal address shown below in 'How to contact us'.

You have the following rights in relation to your personal data:

- Right to change your mind and to withdraw your consent
- Right to access your personal data
- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data

We shall also notify third parties to whom we have transferred your personal data of any changes that we make on your request. Note that while we communicate to these third parties, we are not responsible for the actions taken by these third parties to answer your request. You may be able to access your personal data held by these third parties and correct, amend or delete it where it is inaccurate.

8. Data Storage and Retention

Personal information will be retained only for such period as is appropriate for its intended and lawful use, in this case we shall retain data for no longer than 12 months, unless otherwise required to do so by law. Personal information that is no longer required will be disposed of in ways that ensure their confidential nature is not compromised.

As part of the Company Business Continuity plan and as required by ISO 27001, ISO 9001, ISO 20252 and in certain instances the law, our electronic systems are backed up and archived. These archives are retained for a defined period of time in a strictly controlled environment. Once expired, the data is deleted and the physical media destroyed to ensure the data is erased completely.

9. Notification of Material Changes

We keep our privacy policy under regular review and it may be amended from time to time. We will always have the most up-to-date policy on this web page. We will record when the policy was last revised.

Date created: 15/06/2018

Last revised: 02/04/2019

10. How to Contact Us

Questions regarding this policy, complaints about our practices and access requests should be directed to the Fieldwork Team via email at Privacy@tns-nipo.com or in writing to Theo Gosman, PO Box 247, 1000 AE Amsterdam, the Netherlands.

You can also contact our European Data Protection Officer Gillie Abbotts-Jones at privacy@tns-nipo.com. Our Data Protection Officer monitors for instance our compliance with General Data Protection Regulation plus our privacy policy and is our contact point for the supervisory authorities on issues relating to processing personal information.

11. Complaints

We will investigate all complaints and attempt to resolve those that we find are justified. If necessary, we will amend our policies and procedures to ensure that other individuals do not experience the same problem.

Please contact us using the details above.

You also have the right to complain to the Data Protection Authority. You can direct any complaints about our practices in writing to the Dutch Data Protection Authority (“Autoriteit Persoonsgegevens”), PO Box 93374, 2509 AJ Den Haag, The Netherlands.