

Privacy Policy dated Dec 15th, 2021

This is the Privacy Policy of TATA SIA Airlines Limited (“**TSAL**”, “**we**”, “**our**”, “**us**”).

We are a company registered under the laws of India, having registered office at Jeevan Bharti Tower 1, 10th Floor, 124 Connaught Circus, New Delhi- 110001, India, and corporate office at Intellion Edge, Tower A, 9th & 10th Floor, South Peripheral Road, Sector – 72, Gurgaon, Haryana-122101, India. We are engaged in the business of operating, managing, and providing scheduled air transport services under the brand name ‘Vistara’. For the purpose of the European Union General Data Protection Regulation or the United Kingdom General Data Protection Regulation read together with the Data Protection Act 2018 (as amended), (collectively referred as “**GDPR**”), we are the ‘**data controller**’, for the purpose of the Singapore Personal Data Protection Act, 2012 (“**Singapore PDP Act**”), we are the ‘**organisation**’. Our data protection officer can be contacted at dpo@airvistara.com.

TSAL collects, uses, and discloses Customer Data (as defined below) in order to provide you with a safe, smooth, efficient, and customised experience with TSAL. The collection, use and disclosure of Customer Data enables TSAL to provide services and products that are most likely to meet your needs and requirements. This Privacy Policy outlines TSAL’s policy and responsibility in relation to the collection, use and disclosure of Customer Data.

By continuing to use TSAL’s services, you signify that you have read and understood this Privacy Policy.

SUMMARY

What information do we collect about you?

We collect information when you purchase flight tickets or access other products on our website, mobile application or when you travel with us or when you use our Connectivity Services (defined below) or other inflight entertainment services, such as your name, contact details such as your address, email id and phone number, travel information such as passport information, other identification information (to the extent required for compliance with applicable law), and credit / debit card and other payment details. We also collect information about your preferences from your interactions with our in-flight and ground-based staff, and from specific requests you make. In addition, we collect device and technical information from you when you use our website or mobile application. For more information, please refer Section 1 *“The types of Customer Data we collect”*. For details relating to California residents please refer of Section 4 *“How we use your Customer Data”*

How will we use the information about you?

We use your information to fulfil our contract of carriage with you, to administer your membership with our frequent flyer programme, Club Vistara and to provide the Connectivity Services or other inflight entertainment services of your choice. We also use your information to maintain our website and mobile application, and to tailor our products and services to your preferences to provide the best service possible. In addition, we use your information to market our products and services to you, and those of our group companies, partners, and agents (with your consent where required by applicable law). For more information, please refer Section 3 *“How we use your Customer Data”*. For details relating to California residents please refer of Section 4 *“How we use your Customer Data”*

Who do we share your information with?

We share your data with our third-party service providers to the extent necessary for them to provide their services such as payment processors, telecom service providers, inflight entertainment service providers and ground-operating personnel. We use these third parties services solely to process or store your information for the purposes described in this policy. We also share your information with our interline, code share and strategic alliance partners, other carriers who help us provide our services and our stations and with government bodies as required by law. For more information, please refer Section 4 *“Disclosure of your Customer Data”*.

While we are the data controllers with respect to the Connectivity Services and other inflight entertainment services, Panasonic Avionics Corporation (**PAC**) is the data processor and Nelco Network Products Limited (**NNPL**) is the sub processor appointed by PAC on behalf of us with respect to the Connectivity Services and other inflight entertainment services.

Where do we process your information?

Our information infrastructure is cloud-based and outsourced. We transfer your information to airports and ground staff in destinations that you are flying to and where we operate. Our staff are located in our offices around the world. We also transfer your information to third party

service providers specifically engaged for the purpose of providing Connectivity Services and other inflight entertainment services. For more information, please refer Section 6 “*Transfer of information overseas*”.

How long do we keep hold of your information?

TSAL will retain Customer Data for as long as it is necessary to fulfil the purpose for which it was collected, and for satisfying any legal, business, accounting or reporting requirements or as required by relevant laws. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For EU and UK residents, we will endeavour to delete data within 30 days of a request for erasure or contact you if it will take longer. For more information, please refer Section 10 “*Retention*”.

How can I exercise my rights over my information?

You have various rights in relation to your data.

For more Information for non-EU, UK and California residents, please refer Section 7 “*Non-EU, UK and California Data Subject Rights*”.

For more Information for EU and UK residents, please refer Section 8 “*EU and UK Data Subject Rights*”.

For more Information for EU and UK residents, please refer Section 9 “*California Data Subject Rights*”

Dispute Resolution

If you have any concerns or complaints, please contact us at the addresses mentioned in Section 16 “*Contact us*”.

How will we notify you of changes?

TSAL will amend this Privacy Policy from time to time and the updated versions will be posted on TSAL’s Website. Please check back frequently to see any updates or changes to this Privacy Policy.

For more information, please refer Section 15 “*Updates to the privacy policy*”.

General Customer Data privacy policy statement

1. The types of Customer Data we collect

The types of Customer Data that TSAL collects depends on the circumstances of collection and on the nature of the service requested or transaction undertaken.

There are two broad categories of Customer Data that TSAL collects:

- I. Personal Data- The data we collect includes but is not limited to:
 - i. personal information that can be used to identify an individual, such as name, gender, date of birth, passport, or other personal identification numbers;
 - ii. contact information, such as mailing address, phone number, email address;
 - iii. payment information, such as credit or debit card information, including the name of cardholder, card number, billing address and expiry date;
 - iv. travel information, such as ticket numbers, destinations, flight information;
 - v. information on your other purchases made through TSAL, such as tracking your purchases of chargeable seats, excess baggage, seat upgrades, etc. through the Website (as defined below), packages such as the Vistara Getaways and other linked travel arrangements;
 - vi. your customer preferences, such as dietary, seating, places that you would like to visit or other service preferences;
 - vii. information about your interactions with our ground staff, such as the details of any complaint cases, incidences of lost baggage, call details, and other information relevant to assist our ground staff to service you;
 - viii. health information, such as doctors' notes, medical certificates and letters and requests related to medical conditions;
 - ix. information we receive from you on official social media channels and Website;
 - x. information we receive from flight bookings made via our online booking platform;
 - xi. information we receive from other sources e.g., our official page on social media websites; and
 - xii. business contact information, such as the contact details of the employees of our vendors and corporate customers, as well as the contact details collected by our divisions including the Cargo Division and Engineering Division.

Special categories of information or “sensitive personal data”

Certain categories of Customer Data, such as information about your race, ethnicity, financial information, passwords, biometric information, religion, or health, are considered special categories of information, or “sensitive personal data” under the GDPR. Similarly, medical, and financial data such as bank account details, payment details, etc. and personal identifiers such as passport details are treated as sensitive for the purpose of the Singapore PDP Act.

Generally, we try to limit the circumstances where we collect your sensitive personal data. However, this can occasionally occur because you have made certain requests in connection with your travel arrangements that reveal or suggest something about you that could be

considered “**sensitive personal data**”, or if you otherwise choose to provide such information to us (or a third party such as the travel agent through which you made your booking).

For example:

- if you request a particular type of meal, e.g., halal or kosher meals, this may imply or suggest that you are a member of a particular religion; or
- if you request specific medical assistance from us and/or an airport operator, e.g., the provision of a wheelchair, this may reveal that you have a particular medical condition.
- if you purchase the Connectivity Services, this may result in collection of certain types of financial information from you.

II. Technical Data - Information received through white label solutions managed by third parties on behalf of TSAL. This includes device and technical information you give us when using our website or mobile application (“**Website**”) such as IP addresses, cookie identifiers or other unique identifiers, like mobile carrier, time zone setting, operating system, platform, etc. related to use of Connectivity Services and in-flight entertainment services.

While you use the wireless voice and/ or data services provided by TSAL's service providers on board our aircraft ("**Connectivity Services**") PAC and/ or **NNPL** or any other service providers engaged to provide the Connectivity Services and other inflight entertainment services may collect the information from you.

The information collected from you depends on how you use the Connectivity Services or other inflight entertainment services. To use the Connectivity Services or other inflight entertainment services without creating an account, your email address will be collected. If you create an account for your use of these services, identifiers such as your email address, name, country of residence, and payment information may be collected. In order to use your airline frequent flyer or rewards program miles or points to pay for these services, your rewards program membership number may be collected. You may also provide additional information, such as your seat number on your flight, if applicable. When you contact our customer service center, your name, contact information, such as your email address and phone number, and your reasons for contacting will be collected.

PAC, NNPL or other service providers engaged to provide the Connectivity Services and other inflight entertainment services may also automatically collect the following information about your use of the Connectivity Services or inflight entertainment services, including through the use of network management tools. When you navigate the login page to the Connectivity Services, they may collect:

- your browser type and operating system;
- browsing activity;
- your IP address or device ID;
- the length of time you use the Connectivity Services;
- country of residence, name, address;
- purchase details;
- your flight's route;
- when you initiate an internet session on the Connectivity Services, information about the amount of bandwidth you use may also be collected;

- aggregated data about passengers' use of the Connectivity Services, such as the number of sessions, the number of sessions purchased and the most popular domains from a given flight may also be collected.

For purposes of this policy statement, Customer Data means Personal Data and Technical Data.

We also use Customer Data to derive Statistical Data, such as the number of passengers. This is processed and stored purely for analytical purposes and is entirely anonymous. This information will not be stored to your customer record and will only be aggregated for statistical analysis so that we can better understand TSAL's customer profile and improve TSAL's service offering.

2. How we collect data from you

TSAL collects Customer Data, either directly from you or from your authorised representatives (i.e., persons whom you have authorised and/or persons who have been validly identified as being your authorised representative (e.g., your organisation's corporate travel manager/agent) pursuant to our then-current security procedures).

TSAL also collects Customer Data from third parties which are located in various countries. This includes, but is not limited to, travel agents, our Club Vistara partners (including, amongst others, airlines, and non-airlines), our service providers, other airlines to facilitate travel on code share or multi-airline flights, or through our website, mobile services, any posts on TSAL-specific pages on social media websites and other channels including our ticketing counters and airport operations.

Where you make reservations on behalf of another person, you undertake and will ensure that the individual whose Customer Data is supplied to TSAL has authorised the disclosure, is informed of and agrees to the provisions of this Privacy Policy.

3. Is the provision of Customer Data required?

The collection of the following types of Customer Data is mandatory to enable TSAL to fulfil our contract of carriage with you. These types of Customer Data are marked as mandatory on our booking form. If you do not provide this information, we will not be able to provide you with our services and/or products required.

- Passenger details, e.g., title, first/given name, last/family name, date of birth, meal type, whether you are a resident of EU, UK, Singapore, California, or other country/states.
- Contact details, e.g., email address, mobile phone number, home number or business number.
- Payment details, e.g., the name on the credit or debit card, the credit or debit card number, expiry date and card verification value on the credit or debit card, and billing address which will be transmitted to our payments processors.

Additional information may be mandatory if you are flying to a specific country, or if you are flying on behalf of a business registered in a specific country, e.g., your gender, nationality, passport number, the country of issue of your passport, the name, GST registration number and

address of the business you are flying on behalf of, and your business email address and phone number. These mandatory fields will be clear when you make a booking.

If you choose to use the Connectivity Services or other inflight entertainment services, additional information, if necessary, will be collected from you for provision of these services. The collection of the following types of Customer Data is mandatory to enable TSAL to administer your membership with Club Vistara: (i) title; (ii) last/family name; (iii) first/given name if you do not have a last/family name; (iv) date of birth; (v) email address; (vi) mobile phone number; (vii) mailing address; (viii) gender; (ix) nationality; and (x) whether you are a resident of EU, UK, Singapore, California or Other country/state

These types of Customer Data are marked as mandatory on our sign up / enrolment form. If you do not provide this information, you will not be able to benefit from points accruals and membership tier benefits and we will not be able to provide you with our services and/or products required.

The failure to supply the following types of Customer Data will result in (i) TSAL being unable to update you on our latest products and/or launches; and/or (ii) your inability to enter or participate in contests, promotions or redemption activities organised by TSAL:

- Contact Information e.g., email address, telephone number; and
- Country of residence.

4. How we use your Customer Data

If you are an EU / UK / Singapore resident, we are required to disclose the legal basis for processing your data under the GDPR / Singapore PDP Act.

In accordance with our contract of carriage with you, we will use the Customer Data to:

- process and assist you with any transactions related to your booking (e.g., making a booking, providing services related to the booking (e.g., seat selection, accommodation, etc.), fulfilling such booking and investigating potential fraudulent transactions);
- notify you about changes to our services, including through flight alert messages via TSAL's mobile services facility;
- facilitate airport, internet check-in and self-check-in;
- provide airport services such as processing information relating to connecting flights, arrangements at airports and customs and immigration facilities;
- provide baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims;
- provide in-flight catering, Connectivity Services, inflight entertainment services and other services (e.g., to provide you with a personalised inflight experience);

- in accordance with our contract with you as a Club Vistara member, we will use the Customer Data to:
 - i. maintain your Club Vistara account;
 - ii. facilitate membership-related transactions and services;
 - iii. enable the member to log in using the Club Vistara account on any of the platforms hosted by TSAL; and
 - iv. Send you membership status updates and other account related information.

As it is in our legitimate interests to be responsive to you, to provide customised services and marketing and to ensure the proper functioning of our products, services, and organisation, we will use your Customer Data to:

- improve the Website, the Connectivity Services or in-flight entertainment services and to ensure content from the Website, the Connectivity Services or in-flight entertainment is presented in the most effective manner for you and your device;
- administer the Website or Connectivity Services or in-flight entertainment services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- monitor and record calls for quality, training, legal compliance, analysis, and other related purposes in order to pursue our legitimate interest to improve service delivery;
- send you surveys by post or email (including surveys related to Club Vistara, if you are a member, as detailed below). You can opt-out of receiving these surveys at any time by contacting us;
- send you service emails, such as reminders when you have not checked out your purchases on our website. You can opt-out of receiving service emails at any time by contacting us;
- respond to your enquiries, requests, or feedback;
- enforce our terms, conditions, and policies;
- allow you to participate in interactive features of the Website, the Connectivity Services or in-flight entertainment, when you choose to do so;
- customise our products and services including Connectivity Services to you, including by responding to and catering for your customer preferences;
- personalise the content you see on our Website, Connectivity Services, or in-flight entertainment services, by enabling you to save your preferences and suggesting content for your next flight;

- keep the Website and/or Connectivity Services provided or in-flight entertainment services safe and secure;
- to communicate with you about your use of the Connectivity Services, to fulfil your orders, and for other customer service purposes;
- to tailor the content and information that we may send or display to you, to offer airline and flight customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Connectivity Services. For example, we may customize the language of the Connectivity Services, advertisements displayed in the Connectivity Services login pages based on the airline you are traveling with, the departing and arrival destinations, and where you sit during your flight;
- to better understand how users' access and use the Connectivity Services on an aggregated basis, in order to improve the Connectivity Services and respond to user desires and preferences and for other research and analytical purposes. For example, we may use this information to better manage the provision of the internet services, or to improve connectivity on an aircraft;
- to administer surveys and questionnaires;
- to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority; and
- to protect the safety, rights, property, or security of our flight/staff, the Connectivity Services, any third party or the general public; to detect, prevent, or otherwise address fraud, security or technical issues; to prevent or stop activity that TSAL, in their sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; to conduct audits and to enforce this Privacy Policy.
- aggregate Customer Data into anonymised statistical data (such as number of passengers flown on a particular journey), which we will use for statistical analysis so that we can better understand TSAL's customer profile and improve TSAL's service offering;

to customise our marketing e.g., send you targeted marketing on places you would like to visit, based on your responses to optional questions on our website / inflight entertainment systems and your prior travels. If you are a resident of EU, UK, or Singapore, you can object to this profiling and opt-out of receiving such targeting marketing. For more information on this right, please refer the para with the heading "*Objection*" under Section 8 below; and

- In relation to Club Vistara:
 - i. market and communicate to Club Vistara members information on TSAL and Club Vistara promotions, contests, events, and lucky draws, including those conducted by Club Vistara partners (with your consent where required by applicable laws);

- ii. contact Club Vistara members regarding product and customer related surveys and market research;
- iii. respond to email and call enquiries from Club Vistara members;
- iv. provide services to celebrate special occasions; and
- v. send Club Vistara members Club Vistara-related news and Club Vistara e-statements and associated promotions and offers (with your consent where required by applicable laws).

If you are an EU, UK, or Singapore resident, you can object to this profiling and opt-out of receiving such targeted marketing. For more information on this right, please refer the para with the heading “*Objection*” under Section 8 below.

- if you are an employee of an entity with a contractual relationship with us:
 - i. to contact you to perform our services, and, to monitor and record calls for quality, training, legal compliance, analysis, and other related purposes in order to pursue our legitimate interest to improve service delivery;
 - ii. enforce our terms and conditions against your employer; and
 - iii. communicate with you about products, services, promotions, events and other news and information we think will be of interest to you.

If you are an EU, UK, or Singapore resident, you can object to this profiling and opt-out of receiving such targeted marketing. For more information on this right, please refer the para with the heading “*Objection*” under Section 8 below; and

With your consent where and in the manner required by applicable laws, we will use your Customer Data to:

- send you marketing and promotional materials in relation to products and services offered by TSAL, TSAL’s partner airlines and service partners, as well as TSAL’s appointed agents including in relation to Club Vistara; and
- register you for Club Vistara.

You have the right to withdraw your consent at any time by contacting us at custrelations@airvistara.com.

If you are a California resident, please refer the below table:

Category of personal information ("Customer Data")	How we share it
Identifiers	Sharing for a business purpose: With service providers who process Customer

	Data on our behalf to help us provide our services
Personal Information categories listed in the California Customer Records statute Cal. Civ. Code § 1798.80(e))	Sharing for a business purpose: With service providers who process Customer Data on our behalf to help us provide our services
Commercial information	Sharing for a business purpose: With service providers who process Customer Data on our behalf to help us provide our services
Internet or another similar network activity	Sharing for a business purpose: With service providers who process Customer Data on our behalf to help us provide our services
Geolocation data	Sharing for a business purpose: With service providers who process Customer Data on our behalf to help us provide our services
Inferences drawn from other personal information	Sharing for a business purpose: With service providers who process Customer Data on our behalf to help us provide our services

5. Disclosure of your Customer Data

TSAL will share your Customer Data with selected third parties in the situations set out below:

- our travel and freight service providers or travel-related businesses and service providers (including ground personnel and security personnel, partner airlines, airport management, airport operators;
- our interline, code share and strategic alliance partners so that they can fulfil their contract of carriage for the flights you booked through TSAL and, where applicable, provide you with the relevant benefits of their frequent flyer programme. Where Customer Data is shared with such partners, the Customer Data will be used by that partner in accordance with their respective privacy policy;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website.

- service providers that we engage for the provision of Connectivity Services and other inflight entertainment services.

TSAL will share the Customer Data with its stations in order to better customise your preferences when you travel with TSAL:

- For the purposes of our contract with you, i.e., to:
 - i. Fulfil bookings and facilitate flight transfers of passengers;
 - ii. Manage passengers who travel on flights operated by our interline, code share and strategic alliance partners and/or are Club Vistara members;
 - iii. Manage passengers during flight disruptions and provide necessary assistance and services;
- As it is in our legitimate interests to be responsive to you, to provide customised services and marketing, to:
 - i. Respond to complaints or compliments received by TSAL from passengers who are sharing their flight experience on our flights;
 - ii. Providing an enhanced customer experience and personalising offers to passengers;
 - iii. Anticipating the servicing needs of passengers on flights with us;
 - iv. Understanding customers better through analytics and research (including marketing research) to support personalisation;
 - v. Contacting customers about Club Vistara related updates, surveys and offers; and
- For the purposes of undertaking targeted direct marketing and other forms of marketing or advertisement, provided we have the consent of the recipient and/or have provided the opportunity to opt-out, in each case where required by applicable law.

TSAL will also use and disclose your Customer Data to persons who have been validly identified as being you or your authorised representative(s) pursuant to our then-current security procedures, for the purpose of the relevant transaction or enquiry. Each of the passengers who are grouped under the same Passenger Name Record (“PNR”) number shall be deemed to be authorised representatives of each of the other passengers under the same PNR number.

TSAL will disclose your Customer Data to law enforcement agencies, public, regulatory authorities, border control agencies or other organisations for national security, customs, and immigration purposes, if legally required to do so, or if we have a good faith belief that such use is necessary to:

- comply with legal obligation, process, or request;
- enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
- detect, prevent, or otherwise address security, fraud, or technical issues; or
- protect the rights, property, health or safety of us, our users, a third party or the public as required or permitted by law (including exchanging Customer Data with other companies and organisations for the purposes of fraud protection and credit risk reduction).

We will also disclose your Customer Data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your data to the prospective seller or buyer of such business or assets;
- if we or substantially all our assets are acquired by a third party, in which case Customer Data held by us about our customers will be one of the transferred assets; or
- to comply with legal obligations, processes, or requests (such as disclosing Customer Data to executors in response to court orders).
- in the event we are or may be acquired by or merged with another company, if any of our assets are transferred to another company or as part of a bankruptcy proceeding, we may transfer the information we have collected about you to the other company.
- to third party vendors, service providers, contractors, processors, or agents who provide services on our behalf and who will be subject to this Privacy Policy.
- In addition, TSAL may disclose Customer Data to our legal advisors for establishing, exercising, or defending our legal rights, to our other professional advisors, or as otherwise authorised or required by law. TSAL also reserves the right to share Customer Data as is necessary to prevent a threat to the life, health, or security of an individual or corporate entities such as TSAL. Further, TSAL will disclose Customer Data, as is necessary, to investigate suspected unlawful activities including but not limited to fraud, intellectual property infringement or privacy.

6. Transfer of information overseas

TSAL's Corporate Office is based in Gurgaon, Haryana, India. TSAL's infrastructure is primarily based on Cloud and its Core Systems are Software as Service (SaaS) in nature where its Customer Data is stored and accessed. Customer Data will be accessible to TSAL's offices and appointed agents, including ground handling agents, sales agents, service providers and contact centre agents, in India and around the world in connection with TSAL's performance of the contract with you.

This means that Customer Data will be transferred to, and stored at, a destination outside of your country and outside the European Economic Area ("EEA"), Singapore or the UK.

We will transfer Customer Data to airports and ground crew in destinations that you are flying to in and where we operate. The Customer Data is transferred outside the EEA, Singapore or the UK or country of your residence on the basis that it is necessary for the performance of the contract of carriage between you and TSAL.

We will also transfer Customer Data to us interline / code share partners in strategic alliances for the purposes of performing any contract of carriage. Please click here for a list of our partners. <https://www.airvistara.com/trip/interline-partners>.

If you are a resident of EU, Singapore, or UK, where we transfer Customer Data outside the EEA, Singapore, or the UK, this is done on the basis that it is necessary for the performance of the contract of carriage between you and TSAL.

We will ensure the same standard of protection to Customer Data as required under the applicable law and undertake any other measures required under applicable law to affect such transfer.

The Customer Data will also be processed by staff operating outside the EEA, Singapore or the UK who work for us, for our suppliers or our business partners. Such staff are engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

7. Non-EU, UK and California Data Subject Rights

If you are not a resident in the EU, UK or California, you may have certain rights in relation to the Customer Data we hold about you, which we detail below.

(i) Access.

You have the right to know whether we are in possession or are processing Customer Data about you, and if we do, to access Customer Data we hold about you and certain information about how we use it and who we share it with.

Where permitted by law, TSAL reserves the right to charge a reasonable administrative fee for this service. TSAL reserves the right to deny you access to your Customer Data, if the burden or expense of providing access would be unreasonable to TSAL or disproportionate to your interest, or if the request is frivolous or vexatious and may provide an explanation as required by applicable laws.

(ii) Correction.

You have the right to seek corrections of any Customer Data held about you that is inaccurate or incomplete. TSAL reserves the right to charge a reasonable administrative fee for this service.

(iii) Option to withdraw consent.

You may, at any time, withdraw your consent given or deemed to have been given in respect of the collection, use, processing, transfer, or disclosure of Customer Data for any purpose by TSAL. However, this may affect our ability to provide services to you.

Feedback and complaints

If you have any concerns, feedback, or complaints about the use and/or sharing of your Customer Data, we are open to receiving your feedback or complaints.

Exercise of Rights.

To exercise any of your rights, please contact us at custrelations@airvistara.com. We will respond to your access request as soon as possible. If we are unable to respond to your access request within 30 days, we will inform you by when we can provide the response.

8. EU and UK Data Subject Rights

If you are a resident in the EU or UK, you may have certain rights in relation to the Customer Data we hold about you, which we detail below. Some of these only apply in certain circumstances where TSAL is holding authority of the data and legally/contractually allowed as per the local laws as set out in more detail below. We also set out how to exercise those rights.

These rights include:

- The right of access.
- The right of data portability.
- The right of rectification.
- The right of erasure.
- The right to restrict processing.
- The right to object.

Please note that we will require you to provide us with proof of identity and address before responding to any requests to exercise your rights. We must respond to a request by you to exercise those rights without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances). To exercise any of your rights, please contact us at custrelations@airvistara.com.

(i) Access.

You have the right to know whether we process Customer Data about you, and if we do, to access Customer Data we hold about you and certain information about how we use it and who we share it with.

If you require more than one copy of the Customer Data we hold about you, we may charge an administration fee.

We may not provide you with certain Customer Data if providing it would interfere with another's rights (e.g., where providing the Customer Data we hold about you would reveal information about another person) or where another exemption applies. We may refuse any request or deny you access to your Customer Data if the request is excessive or unfounded and will provide you the explanations in writing as required by applicable laws.

(ii) **Portability.**

You have the right to receive a subset of the Customer Data we collect from you in a structured, commonly used, and machine-readable format and a right to request that we transfer such Customer Data to another party.

The relevant subset of Customer Data is data that you provide us with your consent or for the purposes of performing our contract with you.

If you wish for us to transfer the Customer Data to another party, please ensure you detail that party and note that we can only do so where it is legally, contractually, and technically feasible. We are not responsible for the security of the Customer Data, its transmission or its processing once received by the third party. We also may not provide you with certain Customer Data if providing it would interfere with another's rights (e.g., where providing the Customer Data we hold about you would reveal information about another person).

(iii) **Correction.**

You have the right to correct any Customer Data held about you that is inaccurate or incomplete. TSAL reserves the right to charge a reasonable administrative fee for this service. Please note that whilst we assess whether the Customer Data, we hold about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data as described below.

To exercise any of your rights, please contact us at custrelations@airvistara.com.

(iv) **Erasure.**

You may request that we erase the Customer Data we hold about you in the following circumstances:

- you believe that it is no longer necessary for us to hold the Customer Data we hold about you;
- we are processing the Customer Data we hold about you because of your consent and you wish to withdraw your consent and there is no other ground under which we can process the Customer Data;
- we are processing the Customer Data we hold about you on the basis of our legitimate interest and you object to such processing. Please provide us with detail as to your reasoning so that we can assess whether there is an overriding interest for us to retain such Customer Data;
- you no longer wish us to use the Customer Data we hold about you in order to send you promotions, special offers, marketing, and lucky draws; or
- you believe the Customer Data we hold about you is being unlawfully processed by us.

Also note that you may exercise your right to restrict our processing of the Customer Data whilst we consider your request as described below.

Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure. However, we may retain the Customer Data if there are valid grounds under law for us to do so (e.g., for the defence of legal claims or freedom of expression) but we will let you know if that is the case. Please note that after deleting the Customer Data, we may not be able to provide the same level of servicing to you as we will not be aware of your preferences.

Where you have requested that we erase Customer Data that we have made public and there are grounds for erasure, we will use reasonable steps try to tell others that are displaying the Customer Data or providing links to the Customer Data to erase the Customer Data too.

To exercise any of your rights, please contact us at custrelations@airvistara.com.

(v) **Restriction of Processing to Storage Only.**

You have a right to require us to stop processing the Customer Data we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the Customer Data, we may use it again if there are valid grounds under data protection law for us to do so (e.g., for the defence of legal claims or for another's protection). You may request we stop processing and just store the Customer Data we hold about you where:

- you believe the Customer Data is not accurate, for the period it takes for us to verify whether the Customer Data is accurate;
- we wish to erase the Customer Data as the processing we are doing is unlawful, but you want us to just store it instead;
- we wish to erase the Customer Data as it is no longer necessary for our purposes, but you require it to be stored for the establishment, exercise, or defence of legal claims; or
- you have objected to us processing Customer Data we hold about you on the basis of our legitimate interest and you wish us to stop processing the Customer Data whilst we determine whether there is an overriding interest in us retaining such Customer Data.

(vi) **Objection.**

At any time, you have the right to object to our processing of Customer Data about you in order to send you promotions, special offers, marketing messages, including where we build profiles for such purposes, and we will stop processing the Customer Data for that purpose.

You also have the right to object to our processing of Customer Data about you and we will consider your request in other circumstances as detailed below by contacting custrelations@airvistara.com referencing: Data Subject Rights.

You may object where we are processing the Customer Data, we hold about you (including where the processing is profiling) on the basis of our legitimate interest and you object to such processing.

Please provide us with detail as to your reasoning so that we can assess whether there is a compelling overriding interest in us continuing to process such data or we need to process it in

relation to legal claims. Also note that you may exercise your right to request that we stop processing the Customer Data whilst we make the assessment on an overriding interest. Please refer para with the heading “*Restriction of Processing to Storage Only*” under Section 8.

We reserve the right to charge a reasonable administrative fee for dealing with your request.

9. California Data Subject Rights

The California Consumer Privacy Act of 2018 (“CCPA”) provides California residents with the following rights, including the right to: (i) request information about the personal information we have collected about you; (ii) request information about our sale or disclosure for business purposes of your personal information to third parties; (iii) opt-out of the sale of your personal information to third parties; and (iv) not be discriminated against for exercising any of these rights

(i) Right to know

You have the right to request that we disclose what Customer Data we collect, use, disclose and sell. You also have the right to request the specific pieces of Customer Data we have collected about you, as well as information about our sale or disclosure for business purposes of your Customer Data to third parties. Once we receive, verify, and confirm your request, we will endeavour to disclose to you the information in relation to your Customer Data that you have requested. For any requests related to Customer Data access please write to us at dpo@airvista.com

(ii) Right to delete

You have the right to request the deletion of any of your Customer Data that we have collected from you and retained. Please note that this is a limited right as we may be able to retain certain Customer Data subject to an exception under the CCPA or another lawful obligation. Once we receive, verify, and confirm your request, we will delete (and direct our service providers to delete) your Customer Data from our records, unless an exception applies.

(iii) Right to non-discrimination

You have the right to not be discriminated against for exercising any of these rights. In this regard, TSAL will not:

- deny you any services;
- charge different prices or rates for the services;
- provide a different level of quality of services; or
- suggest different rates or level of quality of services

if we may offer you different price or rate, or a different level or quality of goods or services, if the difference is reasonably related to the value of your data to us.

(iv) Right to opt-out

You have the right to opt-out of the sale of your Customer Data to third parties. Under the CCPA, “sell” includes the transfer or communication of personal information to another business in such a way that conveys value to the recipient business, even if that value is not monetary. This means that sharing for a number of common business activities may be considered a “sale” under the CCPA, even if there is no exchange of money. If you would like to opt-out of the sale of your Customer Data to third parties, please write to us at dpo@airvistara.com.

You may also designate an authorized agent solely to opt-out of the sale of the personal information on the your behalf and TSAL shall comply with an opt-out request received from a person authorized by you to act on your behalf only when such authorized agent is authorized by you through a written permission signed by you.

We do not knowingly sell the Customer Data of consumers under the age of 16 without affirmative authorization from them and in case of consumers below the age of 13, we procure such affirmative authorization from their parent or guardian

Additional information

If you are a California resident, California Civil Code Section 1798.83 permits you to make a request, once in a calendar year, for information regarding the disclosure of your Customer Data to third parties for those third parties' direct marketing purposes. To make this request, please submit a request via email at dpo@airvistara.com

10. Retention

TSAL will retain Customer Data for as long as it is necessary to fulfil the purpose for which it was collected, and for satisfying any legal, business, accounting or reporting requirements or as required by applicable laws. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you withdraw your consent to marketing, we will remove you from our marketing database.

11. Accuracy

TSAL needs your assistance to ensure that your Customer Data is current, complete, and accurate. As such, please inform TSAL of changes to your Customer Data by contacting TSAL and submitting your updated particulars to TSAL in writing (see Section 16). TSAL reserves the right to charge a reasonable administrative fee for this service.

TSAL will also request Customer Data updates from you from time to time. As detailed above, your booking information or flight itinerary will be disclosed to the appropriate customs and immigration authorities as required by law. As such, it is important to ensure that the Customer Data contained in your booking information or flight itinerary is current, complete, and accurate.

12. Security safeguards

TSAL takes reasonable security arrangements to ensure the protection of your Customer Data in its possession or within its control to prevent any unauthorised access, collection, use, disclosure, copying, modification or disposal, or similar risks; and the loss of any storage medium or device on which personal data is stored. Please note however, that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Customer Data, we cannot guarantee the security of your Customer Data transmitted through any channel, such as the Website or Connectivity Services; any transmission is at your own risk.

13. Links to other websites

TSAL may, from time to time, provide you with links to other websites for your convenience and information. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. You access these websites at your own risk and TSAL is not responsible for these websites. Whilst TSAL will protect your Customer Data on our Website and on use of our Connectivity Services, TSAL cannot control or be responsible for the policies of other sites we may link to, or the use of any Customer Data you may share with them. Please note that the TSAL Privacy Policy does not cover these other websites, and TSAL would recommend that you are apprised of their specific policies.

14. Minors

TSAL cannot distinguish the age of persons who access and use our website or use the Connectivity Services. If a minor (as defined under to applicable laws) has provided TSAL with Customer Data without parental or guardian consent, the parent or guardian should contact TSAL (see Section 16) to remove the relevant Customer Data and unsubscribe the minor. If we become aware that Customer Data has been collected from a minor without parental or guardian consent, we will delete this Customer Data and, where that minor has an account, terminate the minor's account.

15. Updates to the privacy policy

TSAL will amend this Privacy Policy from time to time, and the updated versions will be posted on TSAL's Website and other applicable inflight connectivity systems. Please check back frequently to see any updates or changes to this Privacy Policy. Subject to applicable laws, the English version of this Privacy Policy will prevail over any version of this Privacy Policy in another language.

16. Contact us

If you have comments, questions, or complaints about or requests relating to this Privacy Policy statement, please contact TSAL in writing at the address below referencing 'Privacy Policy':

Customer Relations
TATA SIA Airlines Limited
Intellion Edge, Tower A,
9th Floor, South Peripheral Road,
Sector – 72, Gurugram,
Haryana-122101, India
E-mail: custrelations@airvistara.com referencing: Privacy Policy.

For queries specific to Club Vistara, you may contact:

Loyalty Marketing Team
TATA SIA Airlines Limited
Intellion Edge, Tower A,

9th Floor, South Peripheral Road,
Sector – 72, Gurugram,
Haryana-122101, India
E-mail: contactus@clubvistara.com referencing: Privacy Policy

For specific queries relating to data protection at TSAL, please contact:

DPO
TATA SIA Airlines Limited
Intellion Edge, Tower A,
9th Floor, South Peripheral Road,
Sector – 72, Gurugram,
Haryana-122101, India
E-mail dpo@airvistara.com referencing: Data Protection