

Lion Air PRIVACY POLICY as of 21 April, 2020

The following Privacy Policy describes how we, Lion Air (PT Lion Mentari and affiliates, “**we**”, “**us**” or “**our**”), collect, store, process, use, retain, transfer, disclose and protect your Personal Information (as defined below). This Privacy Policy applies to all users of our website (www.lionair.co.id), application, services and/or products (“**Services**”), unless covered by a separate policy.

Please read this Privacy Policy thoroughly to ensure that you understand our data processing practices. Unless otherwise defined, all capitalized terms used in this Privacy Policy shall have the same meaning ascribed to them in the Terms of Use.

This Privacy Policy includes the following matters:

1. Personal Information which we collect
2. The use of Personal Information which we collect
3. Sharing of Personal Information which we collect
4. Retention of Personal Information
5. Access and correction of Personal Information
6. Where we store your Personal Information
7. Security of your Personal Information
8. Changes to this Privacy Policy
9. Acknowledgment, consent and erasure
10. Marketing and promotional materials
11. Anonymous data
12. Third party platforms
13. How to contact us

1. PERSONAL INFORMATION WHICH WE COLLECT

We collect information which identifies, or can be used to identify, contact, or locate the person or device to whom that information pertains (“**Personal Information**”). Personal Information includes, but is not limited to, name, address, date of birth, occupation, phone number, fax number, e-mail address, bank account and credit-card details, gender, identification (including KTP, SIM, or Passport) or other government issued identifier, photo, and nationality. Additionally, to the extent that other information, including a personal profile, unique identifier, and/or biometric information is associated or combined with Personal Information, then that information is also Personal Information. The Personal Information which we collect may be provided by you directly or by third parties (for example: when you access our website, register to our services or use our application, when you contact our customer services, or you otherwise provide Personal Information to us). We may collect information in various forms and purposes (including purposes permitted under applicable law).

Information collected whenever you access or use our Services

- Whenever you register to or create bookings from our Services, we may require you to provide us with certain Personal Information, including your name, physical address, e-mail address, phone number, identification number (National ID and/or Passport) and/or user identification and password that you will use to continue accessing or using our Services. We may also collect information regarding medical conditions which may affect the flight arrangements;
- We may collect additional information in connection with your participation in any promotions or competitions offered by us and information you provide when giving us feedback;
- Whenever you access or use or create bookings from our Services, we may collect information based on your experience in using our Services, including travel preferences, preferred destinations and details of airline frequent flyer membership;
- Whenever you access or use our Services, we may collect certain technical data concerning your usage such as, internet protocol (IP) address, information as web pages previously or subsequently viewed, duration of every visit/session, the internet device identity (ID) or media access control address, and also information regarding the manufacturer, model and operating system of the device that you use to access our Services;
- Whenever you access or use our Services, certain information may also be collected on an automated basis using cookies or site tracker. Cookies are small application files stored on your computer or mobile device. We use cookies or site tracker to track user activities and traffic patterns to enhance user interface and experience. Most computers, mobile devices and internet browsers support the use of cookies. You may adjust the settings on your mobile device or internet browser to reject several types of certain cookies or certain specific cookies. Your computers, mobile device and/or browser would also enable you to delete at any time whatever cookies have previously been stored. However, doing so may affect the functionalities available on our Services;
- Whenever you access or use our Services through your computer or mobile device, we will track and collect your geo-location information in real-time. In some cases, you will be prompted or required to activate the Global Positioning System (GPS) on your mobile device to enable us to give you a better experience in using the Services (for example, to give you information of the currency relevant to your location or recommendation of the most popular destination visited by other users from similar location). You can always choose to disable the geo-location tracking information on your mobile device temporarily. However, this may affect the functionalities available on our Services; and/or
- If you utilize and/or when a payment is made through the electronic payment provided by third parties that collaborated with us, we may collect certain information related to your source of fund (including bank account, credit/debit card and other payment details), transaction history, and billing details (including name, billing address, e-mail or phone number).

Information collected from third parties

To the fullest extent permitted by applicable law, we may also collect your Personal Information from third parties (including our agents, vendors, suppliers, contractors, partners and any others who provide services to us, perform functions on our behalf, or

whom we collaborate with). In such cases, we will only collect your Personal Information for or in connection with the purposes for which such third parties are engaged or the purposes of our collaboration with such third parties (as the case may be).

Information about third parties you provide to us

You may provide us with Personal Information relating to other third-party individuals (including Personal Information relating to your spouse, family members, friends, or other individuals). You will, of course, need their consent to do so – see “Acknowledgement, consent and erasure”, below, for further information.

2. THE USE OF PERSONAL INFORMATION WHICH WE COLLECT

We may use Personal Information collected for any of the following purposes as well as for such other purposes as are permitted by applicable law (“**Purposes**”):

- a. Where you are a user, we may use your Personal Information:
 - to identify you and to register you as a user and to administer, verify, deactivate, or manage your account as such;
 - to facilitate or enable any verification as we may, in our discretion, consider necessary before we register you as a user or before we proceed with your bookings;
 - to process and facilitate bookings and payment transactions made by you;
 - to confirm your identity as a passenger, facilitate your cargo arrangement, perform baggage check-ins and online check-ins;
 - to communicate with you and to send you information in connection with the access or use of the Services, including pre-flights notifications, either through post, email, telephone (including SMS), fax or other form of communication;
 - to notify you of any updates or changes to the Services;
 - to process and respond to enquiries and feedback received from you, including to support any concerns or requests you may have;
 - to maintain, develop, test, enhance and personalize the Services to meet your needs and preferences as a user;
 - to monitor and analyze user activities, behavior, and demographic data including trends and usage of Services;
 - to publish your reviews about our services as well as the listed products on the Site;
 - to resolve any disputes, including for collecting outstanding payment;
 - to process and manage your reward points and your participation in our loyalty programs;
 - to conduct commercial sales on board;
 - to offer or provide Services from our affiliates or partners;
 - to send you direct or targeted marketing communications, recommendations, advertisement, vouchers, surveys, and information on special offers or promotions and digital marketing which includes, however is not limited to, social media, display advertising, Search Engine Optimization (SEO), Search Engine Marketing (SEM) and push notification using open graph techniques;

- to comply with any legal and/or regulatory requirements; and/or
 - for any other purposes that we notify you of when we collect your Personal Information.
- b. We may also use your Personal Information more generally for the following purposes (although we will in each such case always act reasonably and use no more Personal Information than what is required for the particular purpose):
- to undertake associated business processes and functions;
 - to monitor usage of the Services and administer, support and improve the performance efficiency, growth, user experience and the functions of the Services;
 - to provide assistance in relation to and to resolve any technical difficulties or operational problems in connection to the Services;
 - to generate statistical information and anonymous analytics data for the purpose of testing, research, analysis, product development, commercial partnership, and collaboration;
 - to prevent, detect and investigate any prohibited, illegal, unauthorized or fraudulent activities;
 - to facilitate business transactions (which may extend to any mergers, acquisitions or asset sales) involving us and/or any of our affiliates; and/or
 - to enable us to comply with our obligations under any applicable law (including but not limited to responding to regulatory enquiries, investigations or directives) and conducting audit checks, due diligence and investigations.

3. SHARING OF PERSONAL INFORMATION WHICH WE COLLECT

- a. We may disclose to or share with our affiliates or other third parties your Personal Information for any of the following purposes, as well as for such other purposes as are permitted by applicable law:
- where the Services are provided by or on behalf of us by our affiliates or other third parties, for the purpose of providing our Services or enabling such affiliates or third parties to proceed with your bookings or requests;
 - where required or authorized by applicable law (including but not limited to responding to regulatory enquiries, investigations or directives, or complying with statutory or regulatory filing and reporting requirements), for the purpose so specified by that applicable law;
 - where there is any form of legal proceeding between you and us, or between you and another party, in connection with, or related to the Services, for the purposes of that legal proceeding;
 - in relation to any verification as we may, in our discretion, consider necessary before we register you as a user or before we proceed with your bookings;
 - in a situation or an emergency concerning your health, safety, vital interest or other valid interests, for the purposes of dealing with that situation or emergency;
 - in connection with, any merger, sale of company assets, consolidation or restructuring, financing or acquisition of all or a portion of our business by or into another company, for the purposes of such a transaction (even if the transaction is eventually not proceeded with);

- to third parties (including our agents, vendors, suppliers, contractors, partners and any others who provide services to us or you, perform functions on our behalf, or whom we enter into commercial collaboration with) for or in connection with the purposes for which such third parties are engaged or the purposes of our collaboration with such third parties (as the case may be), which may include allowing such third parties to introduce or offer products or services to you, or conducting other activities including marketing, research, analysis and product development; and/or
 - where we share Personal Information with affiliates, we will do so for the purpose of them helping us to provide the Services, to operate our business (including, where you have subscribed to our mailing list, for direct marketing purposes), or for the purpose of them conducting data processing on our behalf. For example, an affiliate of Lion Air group in another country may process and/or store your Personal Information on behalf of the Lion Air group in your country;
- b. We may disclose to or share your Personal Information with our affiliates or other third parties, either located locally or overseas, including but not limited to providers of website hosting, data analysis, marketing, promotions, credit card transactions processing and other relevant services. Where we disclose to or share your Personal Information with our affiliates or other third parties, we will use our reasonable endeavors to ensure such affiliates or third parties protect and process your Personal Information in line with this Privacy Policy and applicable laws, and your Personal Information remains subject to a standard or protection to the requirements under the laws of your country.
 - c. Where it is not necessary for the Personal Information to be associated with you, we will use our reasonable endeavors to remove the means by which the Personal Information can be associated with you as an individual before disclosing or sharing such information.
 - d. We will not sell or lease your Personal Information.
 - e. Other than as provided for in this Privacy Policy, we may disclose or share your Personal Information if we notify you and we have obtained your consent for the disclosure or sharing.

4. RETENTION OF PERSONAL INFORMATION

- a. Your Personal Information will only be held for as long as it is necessary to fulfill the purpose for which it was collected, or for as long as such retention is required or authorized by applicable laws. We shall cease to retain your Personal Information, or remove the means by which the Personal Information can be associated with you as an individual, as soon as it is reasonable to assume that the purpose for which that Personal Information was collected is no longer being served by retention of Personal Information and the retention is no longer necessary for legal or business purposes. In such a case, we will use our reasonable endeavors to provide the same from our affiliates or other third parties whom we share your Personal Information with.
- b. However, please note that there is still a possibility that some of your Personal Information might still be retained by those affiliates or other third parties if such retention is still required or authorized by laws applicable to those affiliates or other

third parties. Furthermore, information relayed directly through communications between you and other parties that act on behalf of or partner with us in providing the Services (such as by telephone calls, e-mail or other method of communications) may also be retained by some means. We do not authorize and encourage the retention of Personal Information by such means and we have no responsibility to you for the same and we shall not be liable for any such retention of your Personal Information. You agree to indemnify, defend and release us, our officers, directors, employees, agents, partners, suppliers, contractors and affiliates from and against any and all claims, losses, liabilities, expenses, damages and costs (including but not limited to legal costs and expenses on a full indemnity basis) resulting directly or indirectly from any unauthorized retention of your Personal Information.

5. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- a. Subject to the applicable law, you may request us for access to and/or the correction of your Personal Information in our possession and control, by contacting us at the details provided below.
- b. To the extent permitted or required under any applicable law, we reserve the right to refuse your requests for access to, or to correct, some or all of your Personal Information in our possession or control. This may include circumstances where the Personal Information may contain references to other individuals or where the request for access or request to correct is for reasons which we reasonably consider to be trivial, frivolous or vexatious.

6. WHERE WE STORE YOUR PERSONAL INFORMATION

- a. The Personal Information that we collect from you may be stored at, transferred to, or processed by third-party service providers. We will use all reasonable endeavors to ensure that all such third-party service providers provide a level of protection that is comparable to our commitments under this Privacy Policy.
- b. Your Personal Information may also be stored or processed outside of your country by personnel who work for us in other countries, or by our third-party service providers, vendors, suppliers, partners, contractors or affiliates. In such a case, we will ensure that such Personal Information remains subject to a level of protection comparable to what is required under the laws of your country (and, in any event, in line with our commitments in this Privacy Policy).

7. SECURITY OF YOUR PERSONAL INFORMATION

Confidentiality of your Personal Information is of utmost importance to us. We will use all reasonable endeavors to protect and secure your Personal Information against any access, collection, use or disclosure by unauthorized persons and against unlawful processing, accidental loss, destruction and damage or similar risks. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best effort to protect your Personal Information, you acknowledge that we cannot guarantee the integrity and accuracy of any Personal Information which you transmit over the Internet, nor

guarantee that such Personal Information would not be intercepted, accessed, disclosed, altered or destroyed in any means by unauthorized third parties, due to factors beyond our control. You are responsible for keeping your account details confidential and you must not share your account details, including your password, One Time Password (OTP), as well as other personal credentials, with anyone and you must always maintain and be fully responsible on the security of the devices that you use.

8. CHANGES TO THIS PRIVACY POLICY

We may review and amend this Privacy Policy at our sole discretion from time to time, to ensure that it is consistent with our future developments, and/or changes in legal or regulatory requirements. If we decide to amend this Privacy Policy, we will notify you of any such amendments by means of a general notice published on our website or application, or otherwise to your e-mail address set out in your account. You agree that it is your responsibility to review this Privacy Policy regularly for the latest information on our data processing and data protection practices, and that your continued access or use of the Services or communications with us following any amendments to this Privacy Policy will constitute your acknowledgement and acceptance to this Privacy Policy and all of its amendments.

9. ACKNOWLEDGEMENT, CONSENT AND ERASURE

- a. By registering to, accessing and/or using the Services, you acknowledge that you have read and understood this Privacy Policy and you accept all of its terms. In particular, you agree and consent to us for collecting, storing, using, retaining, transferring, disclosing or otherwise processing your Personal Information in accordance with this Privacy Policy.
- b. By accepting this Privacy Policy, you warrant that the information, including Personal Information, you provided is true and accurate, current and complete as required in the registration form or as requested by us, and you will update such information to keep it true, accurate, complete and up to date.
- c. In circumstances where you provide us with Personal Information relating to other individuals (such as Personal Information relating to your spouse, family members, friends, or other parties), you represent and warrant that you have obtained such individual's consent for, and hereby consent on behalf of such individual to, the collection, use, disclosure and processing of his/her Personal Information by us.
- d. You may withdraw your consent to any or all collection, use or disclosure of your Personal Information at any time by giving us reasonable notice in writing using the contact details stated below. You may also withdraw your consent for us to send you certain communications and information via any "opt-out" or "unsubscribe" facility contained in our messages to you. Depending on the circumstances and the nature of the consent which you are withdrawing, you must understand and acknowledge that after such withdrawal of consent, you may no longer be able to use the Services. A withdrawal of consent by you may result in the termination of your account or of your contractual relationship with us, with all accrued rights and obligations remaining fully reserved. Upon receipt of your notice to withdraw consent for any collection, use or disclosure of

your Personal Information, we will inform you of the likely consequences of such withdrawal so that you can decide if you wish to withdraw consent.

- e. Upon your consent withdrawal, or based on your request if you find that your Personal Information (i) was collected and processed without your consent or in manners that are not in compliance with the prevailing laws, and/or (ii) is no longer relevant with the purpose of processing as mentioned in this Privacy Policy (in such cases should be proven with a clear, complete and valid evidence which can be verified), we will cease to collect, use or disclose your Personal Information, unless required by law or if we have legitimate business or legal purposes for continuing to process such Personal Information.
- f. You represent and warrant that you are at least 18 (eighteen) years old or are married and are not under guardianship or custody and that you are legally capable and have the right to bind yourself and to accept this Privacy Policy. If you do not meet those conditions but still access or use the Services, you represent and warrant that your act of accessing or using the Services have been approved by your parents, guardian or custodian. You expressly waive any rights under the applicable laws to cancel or revoke any and all consents you provided according to this Privacy Policy when you are deemed legally mature.
- g. You fully understand and agree that this Privacy Policy constitutes an electronic agreement and your action of pressing the “sign up” button when creating an account, the “log in” button when logging in to your account, or “continue” button when proceeding with your bookings or requests is your active consent to enter into an agreement with us so that this Privacy Policy are legally valid and binding and shall continue so long as you access or use the Services. You shall not sue nor object the validity of this Privacy Policy which is made in the electronic form.

10. MARKETING AND PROMOTIONAL MATERIAL

We and our partners, including affiliates or other third parties, may send you direct marketing, advertisement, and promotional communications via push-notification app, message in application website or application, post, telephone call, short message service (SMS), and e-mail (“**Marketing Materials**”) if you have agreed to subscribe to our mailing list, and/or consented to receive marketing and promotional materials from us. You may opt out from receiving such marketing communications at any time by clicking on any “unsubscribe” facility embedded in the relevant message, or otherwise contacting us using the contact details stated below. Please note that if you opt out, we may still send you non-promotional messages, such as ride receipts or information about your account.

11. ANONYMOUS DATA

We may create, use, license or disclose Personal Information, provided, however, (i) that all identifiers have been removed such that the data, alone or in combination with other available data, cannot be attributed to or associated with or cannot identify any person, and (ii) that has been combined with similar data such that the original data forms a part of a larger data set.

12. THIRD PARTY PLATFORMS

- a. Our website, application, and Marketing Materials may contain links to websites that are operated by third parties. We do not control nor accept liability or responsibility for these websites and for the collection, use, processing, sharing, or disclosure of data and information by such third parties. Please consult the terms and conditions and privacy policies of those third-party websites to find out how they collect and use your Personal Information.
- b. Advertisements contained on our website, application, or Marketing Materials operate as links to the advertiser's website and as such any information they collect by virtue of your clicking on that link will be collected and used by the relevant advertiser in accordance with the privacy policy of that advertiser.

13. HOW TO CONTACT US

If you have any questions regarding this Privacy Policy or you would like to obtain access, make corrections to, or request an erasure of your Personal Information, please contact customercare@lionair.co.id.