

## **Privacy Policy for GDPR subjects**

### **1. General provisions**

"Azerbaijan Airlines" Closed Joint-Stock Company (AZAL), as the controller of personal data, attaches much significance to the processing, and protection of personal data in accordance with the requirements of the applicable legislation.

AZAL's GDPR Privacy Policy ("Privacy Policy") outlines the protection and processing of personal data of GDPR subjects to ensure compliance with the European Union's General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR").

This Privacy Policy explains how AZAL collects, uses, and shares your personal data in accordance with GDPR.

### **2. Contact information**

You may contact AZAL through the following contact information if you have any further questions about processing and protection of your personal data by AZAL:

"Azerbaijan Airlines" Closed Joint-Stock Company

AZ1095, Baku, Azerbaijan  
Azadlig avenue 11  
Tel: +994 12 497 26 00  
Fax: +994 12 598 52 37  
Email: [dpo@azal.az](mailto:dpo@azal.az)

If you contact us by e-mail, correspondence is not encrypted.

### **3. Legal basis and purposes of data processing**

AZAL processes your personal data for the purposes and legal basis listed below:

-to fulfil obligations under a contract AZAL has with you or in order to take steps at your request prior to entering into a contract (Article 6(1)(b) GDPR):

- to manage the reservation, sale and provision of flight and other services (including services offered at the airport);
- to manage flight operations, check-in, boarding and baggage handling processes;
- maintaining communication with customers and managing customer relationships;
- to collect and share information with state authorities as well as airport operators and other organisations as required under applicable laws in order to fulfil the contract of carriage or any other contract you may have with AZAL;
- to manage membership (loyalty) programs as required to pursue AZAL's legitimate interests (Article 6(1)(f) GDPR):

- to manage requests (answering customer queries and claims) and performing service evaluations;
- to personalize and improve the customer experience and services (products);
- to prevent, investigate and/or report things such as fraud, terrorism, misrepresentation, security incidents or any other illegal activities, in accordance with applicable laws;
- to pursue legal claims and organise defence in the event of legal disputes;
- to maintain the safety of flights;
- to develop IT infrastructure, implement and audit information security processes and operations;
- to perform emergency and incident management operations;
- to conduct financial and accounting operations, performing payment and reimbursement activities.
- to fulfil legal obligations (Article 6(1)(c) GDPR):
- to ensure compliance with the national and international legislation applicable to AZAL's activities;
- to respond to lawful queries of state authorities or courts;
- to transmit the data to immigration (border control) or health authorities for the implementation of travel control or disease (pandemic) combat.
- based on your consent (Article 6(1)(a) GDPR):
- sending marketing messages regarding AZAL's services and products;
- cookies and other similar technologies – to ensure smooth functioning of AZAL's websites and mobile applications, to improve and protect them.
- when necessary, AZAL will also ask for your consent to use your data and will provide you with the purpose for which the data is used at that time.

When legally or contractually necessary, provision of certain information will be mandatory. Otherwise, AZAL will not be able to process your request. These information fields will be marked as mandatory.

Whenever we rely on your consent, you have the right to withdraw it at any time. However, we may still process your data for other purposes based on different legal grounds, as outlined above. Withdrawing your consent does not apply retroactively and does not impact the legality of data processing carried out before the withdrawal date. You also have the unconditional right to opt out of direct marketing or any related profiling at any time. To do so, simply follow the instructions in the electronic communication or reach out to us using the contact details provided below.

#### **4. Categories of personal data collected and processed**

AZAL collects (and/or receives from third parties) and processes the following information:

- **Information on identity documents** - name, surname, nationality (citizenship), date of birth, gender, type and number of travel documents, effective and expiry date, country of issue of the document and other information reflected in the identity documents provided by the customer/user to AZAL;



- **Contact information** - phone number, mobile number, e-mail address, social media accounts, address of actual residence or registration and other contact information provided by the customer/user to AZAL;
- **Flight (ticket) information** – flight itinerary, flight date and time, channels used for purchasing the tickets and place of purchase (address of purchase, including IP addresses);
- **Information about Customer Requests** - CDR (call detail record), Call Centre information, payment card information, customer instructions, cash receipts and other information regarding the customer/user's inquiry to AZAL;
- **Process Security Data** – personal account data (username and password) created when using products or services provided in digital channels;
- **Risk Management Information** - results and records of various inquiries provided by public authorities regarding the customer, records of security requests for flight ban, address registration system records, IP address monitoring records and other information from this category;
- **Financial Information** - data collected during payments made by a person when purchasing AZAL products and services (credit/debit card information, bank account information, IBAN information, balance information, transaction information (including date and time of transaction, transaction amount, currency, masked card, card acceptor ID) and other financial information);
- **Special Categories of Personal Data** - health information, information on allergies, food preferences, information on disability (health limitations) and other information that may affect the flight and is required for the provision of special services;
- **Audio and visual information** – photographs, videos and voice records;
- **Marketing Data** - reports and assessments reflecting user habits and tastes used for marketing purposes, cookie data, information from database expansion, satisfaction surveys, data collection campaigns and results of evaluation from direct marketing activities, and other data from this category.

## 5. Methods of collecting personal data

AZAL collects personal data through following sources and channels in verbal, written or electronic form, by fully or partially automated and non-automated means:

- booking and reservations systems, ticket offices, check-in counters and boarding checkpoints, inflight services, call centre, suggestions and complaints, surveys and questionnaires, AZAL's official social media and messaging platforms;
- websites and mobile applications belonging to AZAL;
- loyalty programs and marketing subscriptions;
- agents authorized to sell AZAL services and products, various sales channels, business partners
- data obtained through partners, including banks, payment networks and other entities that interact with you.

## **6. Transfer of personal data**

- Your data may be transferred to the following categories of recipients in Azerbaijan and abroad as part of the processing mentioned above, in accordance with the relevant legal bases: AZAL's structural divisions and subsidiaries, affiliated entities;
- agents, suppliers, financial organisations, contractors and business partners within the context of AZAL's cooperation/partnership with them;
- other airlines and providers of ground transport services that perform part of the carriage;
- state authorities and institutions, international organizations to comply with legal requirements.

AZAL will transfer your personal data to non-EEA (European Economic Area) countries, but only if specific conditions are met to ensure an adequate level of data protection. These conditions include:

- Adequacy Decision of the EU Commission (Article 45 GDPR);
- EU standard contractual clauses (Article 46 GDPR);
- Exceptions under Article 49 GDPR.

AZAL's sites and applications may include links to third-party websites and. Clicking these links may allow third parties to collect or share your data. We do not control their privacy practices and are not responsible for their policies.

## **7. Duration of data retention**

AZAL will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including any legal, accounting, or reporting obligations. The retention period may vary depending on the type of data and the purpose for which it is processed. AZAL may also retain your data until the end of the statutory limitation periods (where required for the establishment, exercise or defence of legal claims).

Marketing data is retained until you withdraw your consent, at which point it will be deleted.

Once the retention period expires, we will securely delete or anonymize your personal data unless we are required to retain it longer due to legal or regulatory obligations.

## **8. Rights of data subjects**

Under the GDPR you are entitled to the following:

- Right to withdraw consent (Art. 7 GDPR);
- Right of access (Art. 15 GDPR);
- Right to rectification (Art. 16 GDPR);
- Right to erasure (Art. 17 GDPR);
- Right to restriction of processing (Art. 18 GDPR);
- Right to data portability (Art. 20 GDPR);
- Right to object (Art. 21 GDPR).



To exercise your rights, please email [dpo@azal.az](mailto:dpo@azal.az) and include the following details for identification:

- Full name;
- Postal address;
- Email address and optionally: Customer number, booking code, or ticket number.

Please indicate which specific rights you wish to exercise.

If providing a copy of your passport or ID, ensure that all information except your first name(s), surname, and address is redacted.

Your personal data will be processed in accordance with Article 6(1)(c) of the GDPR for identification and request handling purposes.

Under Article 77 of the GDPR, you have the right to file a complaint with a supervisory authority. The competent supervisory authority can be identified according to the list provided under: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **9. Information about your right to object under Article 21 GDPR**

You have the right to object to the processing of your personal data at any time if it is based on legal grounds related to your specific situation, as outlined in Article 6(1)(e) and (f) of the GDPR. This also applies to profiling carried out under these provisions.

Once you object, AZAL will stop processing your personal data unless they can demonstrate compelling legitimate reasons that outweigh your interests, rights, and freedoms, or if processing is necessary for the establishment, exercise, or defence of legal claims.

If your personal data is processed for direct marketing purposes, you have the right to object at any time, including when profiling is used for such marketing. If you object, your personal data will no longer be used for these purposes.

You can exercise your right of objection in connection with the use of the services of an information company – notwithstanding Directive 2002/58/EC – in an automated process in which technical specifications are used.

## **10. Data security**

AZAL implements comprehensive technical and compliance measures to protect Customers' personal data and minimize risks related to unauthorized access, accidental data loss, intentional deletion, or damage to personal data.

In this respect AZAL:

- Access to personal data within AZAL is managed through a controlled process, based on the nature of the data and within the “need to know” framework;
- Implements more stringent measures for accessing special categories of personal data;
- Ensures the lawfulness of the data processing activities by way of internal policies and procedures;
- Carries out required audits to enforce GDPR provisions, aligning with Article 32 of the GDPR;
- If external access to personal data is required for outsourced services, AZAL requires the third party to commit to adhering to the provisions of the GDPR;

- It takes necessary steps to inform all employees, particularly those with access to personal data, about their duties and responsibilities under the GDPR.

### **11. Changes to this Privacy Policy**

AZAL retains the right to update this Privacy Notice to ensure it reflects current practices and regulations regarding personal data protection. In the event of significant changes, AZAL will notify data subjects through appropriate channels.