



# CUSTOMER PRIVACY PROTECTION POLICY

Air Creebec is committed to protecting your privacy. As an air carrier, we attach particular importance to protecting the personal information that you share with us and we strive to maintain your trust in this regard.

Air Creebec must follow a code for the protection of personal information. This code stems from the 10 principles of Schedule 1 of the Personal Information Protection and Electronic Documents Act (PIPEDA) shown as follows:

## 1. ACCOUNTABILITY

Air Creebec is responsible for ensuring compliance with the requirements of PIPEDA. Should you have any questions regarding this policy or concerns with respect to Air Creebec's compliance with the requirements of PIPEDA, you may contact Air Creebec at the address below.

Air Creebec  
Privacy Protection  
313-93, rue Arseneault,  
Val d'Or, Qc  
J9P 0E9  
[privacyprotection@aircreebec.ca](mailto:privacyprotection@aircreebec.ca)

If Air Creebec websites refer you to other websites operated by third parties, the information collected by said third parties on those other sites are not subject to this Policy. We therefore encourage you to review the privacy policies of those websites before disclosing your personal information to any third party.

## 2. IDENTIFYING PURPOSE

When you purchase an Air Creebec ticket, you will be required to provide certain personal information. This may include name, address, email, telephone number, emergency contact, age and payment information.

This information is used, to process your booking and to keep you safe and secure. The information is required to identify you, in order to contact you, if necessary and to complete the process of your purchase. We also request your gender to assist in estimating the aircraft's total load and as an additional identifier.

Some of this information is shared with Air Creebec's trusted partners (i.e. airport ground handlers to ensure that your baggage arrives safely at your destination). We are also required to share some of your information with airport authorities for reasons of security.

### **Additional information for personalized services**

#### **Sensitive personal information**

When providing services to you, we may collect personal information that is considered sensitive as it could reveal physical or mental health, religious beliefs or criminal convictions or offences. Likewise, your travel document details may contain information that may reveal your racial or ethnic origin.

This sensitive personal information will be used strictly to allow us to provide any special services requested and to fully perform our obligations.

#### **Discounts**

Air Creebec offers special discounts to seniors, infants and children. To assess your fare eligibility and ensure that your ticket is correctly processed we need to record the passenger's date of birth at the time of booking. At the airport, for verification, you are required to present personal identification with the date of birth of the passenger.



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## **Special Assistance**

We offer a range of travel services to customers with special needs. We also do our best to make your travel with us as comfortable as possible. Should you require special assistance such as the use of a wheelchair, or should you have a medical condition requiring the supply of oxygen on board, we need to record this information in your travel booking. This information will be forwarded to the airport staff as well as to the flight crew.

In certain airports we outsource the ground handling to another company. When that is the case, we need to transfer the information.

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

## **Unaccompanied Minors**

Children between the ages of 5 and 12 may travel alone on Air Creebec. However, the Unaccompanied Minor (UM) service is mandatory in such cases. The UM service includes provisions for your child to be escorted by Air Creebec agents and/or flight attendants from the moment they arrive at the airport check-in, until they reach their final destination.

Parents or guardians must request the service at the time of booking by calling Air Creebec reservations.

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

## **Aeroplan**

Aeroplan operates the loyalty program. Aeroplan enables our customers to accumulate miles for segments flown on Air Creebec or for services or products purchased from participating Aeroplan partners. These miles are exchangeable for travel on Air Creebec or on any of Aeroplan's partner airlines. To support this, Air Creebec and Aeroplan are required to exchange information. The information exchanged is limited to that which is required to fulfill the purpose.

## **Social Media**

We collect information that you enter during contests or comments that you choose to share on our social media platforms. Depending on your social network settings, we may receive information from your social network provider.

## **3. CONSENT**

When you book your travel or join aircreebec.ca, you provide Air Creebec with your implied consent to use your information to fulfill your request.

When we process your information based on consent you have previously given, you may withdraw said consent at any time. In case of non-provision, objection or restriction to processing or erasure of any information necessary to provide you with our services, or in the event you wish to restrict or withdraw consent previously given to us for the collection and use of your sensitive personal information, we may not be able to provide certain or all of our services to you. In such circumstances, cancellation fees may apply.



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## **Third Party Bookings and Changes to Bookings**

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

If a third party who has booked your current flight, or other travel service, or, who otherwise has your full name and booking reference contacts us and seeks information on your booking or wishes to make changes to it, we will disclose your booking information and allow such third party to make changes as we will conclude that you have given them your consent to do so. If you do not want an individual to be able to obtain information on or make changes to your booking, you should not share your booking reference with them.

## **4. LIMITING COLLECTION**

Air Creebec will limit the collection of personal information to that which is necessary to fulfill the purpose for which it was collected. We will only keep your information for as long as we reasonably need it for the purpose it is being processed for, in accordance with this privacy policy or in order to comply with the law.

## **5. LIMITING USE, DISCLOSURE AND RETENTION.**

Air Creebec will not use or disclose your personal information for purposes other than those for which it was collected without your explicit consent or as required by law. You should understand that all airlines, including Air Creebec, are required by new security laws to give border control agencies and safety control access to passenger data. Accordingly, any information we hold about you and your travel arrangements may be disclosed to authorities.

We will share your personal information with third parties only in the ways that are described in this privacy policy. We do not sell your personal information to third parties.

## **6. ACCURACY**

We make every effort to keep the personal information in our possession accurate, complete, and up to date. However, you are in the best position to quickly inform us of any changes to your personal information, and we therefore ask you to inform us of any required amendments.

At any time, you may request that appropriate corrections be made to the personal information that we hold about you. If applicable, we will forward the amended information to the third parties that have access to your personal information.



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## 7. SAFEGUARDS

Air Creebec uses contractual and other means to ensure that your personal information is afforded protection that meets the requirements of PIPEDA. We take reasonable measures to ensure that our agents, mandataries, representatives and other external organizations comply with the provisions of the privacy protection legislation in force (e.g. airport service, data processing, data storage companies or administrative support, payment processors, etc.).

Your personal information is treated as strictly confidential by Air Creebec, and the company has taken the appropriate technical and organizational security measures against loss or unlawful processing of this information. To this end, Air Creebec uses several security techniques including secure servers, firewalls and encryption, as well as physical safeguard of the locations where data is stored.

We educate our employees about the importance of protecting personal information by providing them with training on their duties and responsibilities regarding this policy.

## 8. OPENNESS

Air Creebec privacy practices are as outlined within this policy. Should you have any questions or comments you may contact the Air Creebec Privacy Office at the address provided above.

## 9. INDIVIDUAL ACCESS

You may access your personal information held in your profile on [www.aircreebec.ca](http://www.aircreebec.ca).

Upon request, Air Creebec will provide you with information about whether we hold or process any of your personal information on behalf of a third party. If you want access to your personal information on your travel booking through a Call Centre you should have your booking reference number or your e-ticket number available to help us ensure that you are entitled to access the information. To request this information, please contact the Air Creebec Privacy Office at the address provided above. We will respond to your request within a reasonable timeframe.

## 10. CHALLENGING COMPLIANCE

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