

# Customer privacy policy

## Cathay Pacific Customer Privacy Policy

When you use Cathay Pacific's<sup>1</sup> services, you entrust us with personal information (Personal Data). This Cathay Pacific Customer Privacy Policy (Privacy Policy) sets out what information we collect, and how we use it.

This Privacy Policy also applies when you buy travel packages from us or from Cathay Holidays Limited (or its subsidiaries).

Cathay Pacific also offers the [Cathay Membership Programme](#), our loyalty programme. If you are a Cathay Membership Programme member or a Registered Account holder, this Privacy Policy also explains how Cathay Pacific uses and shares any Personal Data in connection with your membership.

### 1. Our Commitment to Protect Your Privacy

At Cathay Pacific, we are committed to protecting your Personal Data and your privacy. To ensure that you can make informed decisions and feel confident about sharing certain personal information with us, please read this Privacy Policy to understand who we share your Personal Data with and for what purposes, and the choices you have concerning how your Personal Data is collected and used by us. We may also provide further privacy collection notices highlighting certain uses of your Personal Data, together with the ability to opt in or out of certain uses, when we collect Personal Data from you.

The laws of certain countries require us to provide you with additional information about our processing activities and we have included separate appendices to deal with these. As well as this document, please refer to the appendices which apply to you.

We will notify you of any changes to our Privacy Policy, including by posting the revised policy on [www.cathaypacific.com](http://www.cathaypacific.com). The changes will be effective from the date of posting.

### 2. The Personal Data We Collect

2.1 We will collect and process some or all of the following Personal Data about you:

**(a) Information about you**

Your personal information such as your full name, gender, date of birth, nationality, travel document details including passport number, passport expiry date, country that issued your passport and your country of residence (this information is also known as Advanced Passenger Information (API)), your contact details, your parents'/guardian's names and contact details, address, and photographs and other images;

**(b) Your payment details**

Payment details used to purchase our products and services such as credit or debit card number and expiry date, account information relating to other payment services (such as online or mobile payment services or virtual currency) and billing information;

**(c) Information we collect in relation to your travel**

Information about your travel arrangements such as your travel itinerary, hotel selection, your choice of tours, car rentals or other add-ons to your travel package, details of your travel companions or persons assisting you, your activity at airport departure and arrival halls, your redemption group members, seat and meal preferences, your emergency contacts and any information relating to any special assistance that you require such as dietary requirements or health issues;

**(d) Information about your Cathay Membership Programme membership and transactions**

Information provided in your application to join the Cathay Membership Programme, your membership number, your user name and your earning and claiming of Status Points or Asia Miles, and details about your nominated companions;

**(e) Information about your use of our products and services**

Information such as previous travel arrangements, feedback about your experiences, details of lost luggage and other claims, your use of our inflight entertainment system and inflight connectivity, your images captured via CCTV in our airport lounges and aircraft, your use of our cargo services including details of the cargo shipments, and your purchase of our duty free products and branded items;

#### (f) Your interests, preferences and opinions

Information that we collect about your interests, preferences and opinions such as your hobbies, destinations you are interested in and products and services you have bought;

#### (g) Our interactions with you

A record of any interactions and correspondence between us such as calls made through our call centre, any interactions you have with our staff or representatives (including whilst on board our flights) and any interactions with us or posts that refer to us on social media;

#### (h) Survey information

Your responses to market surveys and contests conducted by us or on our behalf;

#### (i) Your use of our website, apps and social media platforms

Details of your visits to our website, your use of social media platforms and our mobile applications and other information collected through cookies and other tracking technology including information that you look at. We may also collect information about you that is publicly available online, including your social media profiles; and

#### (j) Employment and company information

If you are an employee or other person travelling or obtaining products or services in relation to our corporate/business travel services or one of our corporate or government clients, we will collect certain information about your employment, company information or relationship with our corporate or government clients such as your company's or employer's name, your professional title and your work contact information

2.2 Certain Personal Data (particularly details of your travel documentation, payment details and contact information) are required for many of our products and services and if you fail to supply such Personal Data as requested for specific services, we may be unable to deliver you the products and services in full.

### 3. How we collect Personal Data

3.1 We will collect some Personal Data from you directly. We will collect other Personal Data from third parties including: (a) travel agents (including corporate travel managers) and other persons that make bookings or otherwise interact with us on your behalf; (b) our service providers and agents such as our ground handling agents who assist you with check-in and boarding or our call centre agents who provide customer service; (c) third parties such as other airlines, providers of other travel-related services; (d) our third party marketing partners; (e) the third parties that we partner with in connection with the Cathay Membership Programme, including credit card issuers, hotel operators, retailers and restaurants; (f) the operator of our loyalty programme (i.e. Asia Miles Limited); (g) organisations which conduct credit, fraud, and other passenger checks; (h) immigration, customs, border security and law enforcement bodies, airport authorities and other government or regulatory bodies; and (i) providers of third party websites, apps and social media platforms.

3.2 If you provide us with information about other individuals, you must tell those individuals and let them know where they can find a copy of this Privacy Policy.

3.3 If you were a member of Asia Miles or Marco Polo Club loyalty programmes, we have obtained your Personal Data through those programmes to continue offering you our services, now under the name of Cathay Membership Programme, and to maintain your tier status and miles balance.

#### 4. Why we collect and use your Personal Data

4.1 When you share information with us, you help us make our services to you better. Here are some of the ways we will use your Personal Data:

##### (a) To provide our products and services to you and to administer your travel arrangements

To provide our products and services to you and to process and administer your travel and service arrangements, to contact you about your travel and service arrangements and to send you service-related communications, to deliver of benefits and services associated with your travel package or requested services, to identify and verify your identity in connection with the services we provide, to provide or facilitate any special assistance you may have asked for;

##### (b) To tailor and personalise our products and services to you

To tailor and personalise the products and services that we provide to you, including providing your details to our staff and cabin crew so they can greet you personally and acknowledging your loyalty if for example you are a Diamond Cathay Membership Programme member. We may also tailor our communications to you and tailor what we present to you to better match your preferences and interests;

**(c) To provide customer support**

For customer support purposes such as responding to your enquiries and requests, providing assistance to you in relation to issues such as baggage claims and flight delays;

**(d) For marketing purposes**

For providing you with marketing communications, as explained in more detail in section [6] below;

**(e) To operate and facilitate your participation in our loyalty programme**

Where you are a member of Cathay Membership Programme, we will use Personal Data that we collect about you for the operations of the Cathay Membership Programme such as processing your membership application and to ensure that you get the benefit of our loyalty programme, including to track your earning and claiming of Status Points or Asia Miles, your accrual and redemption activities and record your mileage credits.

**(f) For social interactions**

To administer campaigns, contests and sweepstakes conducted by us when you choose to participate in them, including disclosing the winners of any such contest;

**(g) To improve our products and services**

For the purposes of improving our products and services for the benefit of our customers generally, including to ensure that our websites and web pages (including social media pages) function correctly and in accordance with your preferences and circumstances;

**(h) For safety and security purposes and emergency response activities**

To ensure the safety and security of all our staff and passengers and to undertake any necessary activities during emergency events;

## (i) To comply with our legal obligations and for legal and administrative purposes

To comply with our legal and regulatory obligations and for legal and administrative purposes such as, verifying and processing payment, screening against fraud, screening against abusive booking, money laundering and other criminal or unlawful activities, accounting, billing and audit purposes, developing, maintaining and testing our systems, for claims handling and for understanding, exercising, enforcing or protecting our legal rights and those of others.

## 5. Who we share your Personal Data with

In certain circumstances, we will disclose your Personal Data to third parties as described below:

### 5.1 Our service providers and members of the Cathay Pacific group who process personal data on our behalf for the purposes described in section 4

We will permit our third party service providers, including agents, contractors and other Cathay Pacific group companies, to use your Personal Data on our behalf for the purposes set out in section 4. Examples of such third parties include our ground handling agents who assist you with check-in and boarding, our airport lounge operators, operators of our IT systems and call centre agents. We may also disclose your Personal Data to third parties in order to facilitate any special arrangements that you may have requested, such as liaising with airport authorities to arrange wheelchair assistance or our catering providers to accommodate any special meal requests.

If you are a member of the Cathay Membership Programme, we will share your Personal Data with our wholly owned subsidiary, Asia Miles Limited, for the provision and management of the Membership Programme, including sending you marketing materials if you have consented to receive such communications.

### 5.2 Third parties such as other airlines, hotel partners, travel operators and travel agents in order to facilitate and administer your travel arrangements

In order to facilitate and administer your travel arrangements, we may transfer your Personal Data to third parties such as other airlines (including oneworld partner airlines, other partner and codeshare airlines in the context of codeshare and interline arrangements [where we are the marketing carrier]), hotel partners, land or sea transport operators, as well as to travel agents or other persons who interact with us on your behalf.

Your Personal Data will be used by such third parties in accordance with their privacy policies. The privacy policies of our interline and codeshare partner airlines can be found in the International Air Transport Association (“IATA”) privacy policy repository at <http://www.iatatravelcenter.com/privacy>[Open a new window](#). For others, please visit the third parties’ website for more details. In order to facilitate and administer your insurance when you fly with us covering for medical expenses related to a COVID-19 diagnosis we may transfer your Personal Data to our insurance partner AXA. Your Personal Data will be used by AXA in accordance to its [privacy policy](#)[Open a new window](#)

### 5.3 Our third party partners, for marketing purposes

We may disclose your Personal Data to third parties so they can provide marketing services or conduct marketing or social interaction activities on our behalf such as campaigns, contests, sweepstakes, market research, customer surveys and data analytics to help us improve and tailor our marketing activities, products and services. Subject to us having obtained appropriate consent from you, we may also disclose your Personal Data to our third party marketing partners in order that they may market their products and services to you. If you are a member of Asia Miles, we will also share your Personal Data with Asia Miles for the above purposes, as well as to enable Asia Miles to combine your Personal Data with the personal data they hold about you.

### 5.4 Our corporate or government clients

For employees or other persons travelling or obtaining products or services in relation to one of our corporate or government clients, we will disclose your travel details and information concerning your use of our service to our corporate or government clients.

### 5.5 Government and regulatory bodies and other individuals, bodies and organisations (for example immigration, customs, border security, regulators and the police) for the purposes of complying with our legal obligations, for reasons of safety and security, to enable us to provide our products and services to you and otherwise for legal and administrative purposes

We may disclose your Personal Data to governments and regulatory authorities and bodies and to other individuals, bodies and organisations such as immigration, customs, border security, airport authorities, dispute resolution, prosecution and law enforcement bodies, legal advisers, organisations which conduct credit, fraud and other passenger checks, and other individuals, bodies and organisations for the purposes of complying

with our legal obligations, for example, where we are required by laws in the United States, France and other countries to disclose your Personal Data in relation to your travel document, booking details and flight itinerary (also known as Passenger Name Record (PNR) and/or Advanced Passenger Information (API)) to relevant customs and immigration authorities as required by laws. We may also disclose your Personal Data to such individuals, bodies and organisations for reasons of safety and security, to enable us to provide our products and services to you and otherwise for legal and administrative purposes.

## 6. Marketing

6.1 We may use Personal Data for marketing and promotional purposes, including (i) for sending or showing you updates on latest news, offers and promotions in connection with our products and services (and the products and services of our group companies such as Asia Miles and third parties) (ii) for sending or showing you joint marketing offers about our travel services and packages, loyalty programmes, contests and sweepstakes, duty-free sales and ancillary services such as travel insurance, hotel transfers and car rentals; or (iii) for tailoring and tracking your interactions with internet banner advertisement and links from third party websites to our website.

6.2 We may also use Personal Data to analyse our customers' preferences and market trends and derive insights, which we may use to tailor the types of products and offers that we present to you. This may involve us combining Personal Data that we hold about your use of our services with information that we have collected about your web usage. We may also combine information that we have collected about you with information that we have collected about our other customers in order to derive these insights and establish market trends. We may provide these insights to our third party partners and Asia Miles for their marketing and promotional purposes. We also use advertising services and products provided by third party service providers (such as marketing agencies and social media platforms) for marketing and promotional purposes, which may involve us sharing Personal Data that we hold about you with them.

6.3 We may communicate marketing, promotions and research invitations to you by post, telephone, or online (including by email or through your mobile device or via online banner advertisement) and, as appropriate and where required, we will ask you for your consent, or otherwise provide you with the opportunity to choose not to receive marketing, at the time we collect your data.



6.4 We will provide an option to unsubscribe or opt out of further communication on any direct marketing communication sent to you. You may also opt out by contacting us as set out in paragraph 8 below.

6.5 Please note that if you choose to unsubscribe or opt out of marketing communication, we will still send you communications about your travel with us and any other services that we provide to you. Where you are a Cathay Membership Programme member or a Registered Account holder, you will also continue to receive administrative emails, account summaries and updates to our services.

## 7. Transmission, storage and security of your Personal Data

### 7.1 IT Security

No data transmission over the Internet, a website, mobile application or via email or other message service can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your Personal Data in accordance with the requirements of data protection legislation.

All Personal Data we collect about you is stored on our or our subcontractors' secure servers. We comply with our security policies and standards when accessing or using this information and restrict access to your Personal Data to those persons who need to use it for the purpose(s) for which it was collected. You are responsible for keeping any information that we send to you confidential and for complying with any other security procedures that we notify you of. In particular, where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or mobile applications, we ask you not to share a password with anyone.

### 7.2 Exporting your Personal Data

Your Personal Data may be transferred outside the country in which you are located, including to countries with a lower level of data protection than in the country in which you are located.

### 7.3 Retention period

We will retain your Personal Data for as long as is necessary for the processing purpose(s) for which it was collected and any other permitted linked purpose (for example where we are required to retain personal data for longer than the purpose for which we originally collected it in order to

comply with certain regulatory requirements). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised (and the anonymised information will be retained) or securely destroyed.

## 8. Your rights and contacting us

### 8.1 General rights

You have the right (subject to various exceptions and in accordance with data protection legislation in your country) to access certain Personal Data held about you, correct any inaccuracies, request for deletion or suspension of processing of your Personal Data, or request to withdraw consent for collection and use of Personal Data. Where permissible under the law in your country, you may exercise these rights through your legal representative or someone who has been authorised by you to exercise such rights. In this case, we shall deem the person who exercises these rights to be either the data subject or a legitimate legal representative. We may charge a reasonable fee for the processing of any data access request in accordance with data protection legislation in your country. You also have the right to raise a complaint about our processing with the data protection regulator in your jurisdiction.

### 8.2 Right to opt out of direct marketing

You have the right to ask us not to process your Personal Data for direct marketing purposes. You can exercise your right to prevent such processing by indicating that you do not consent to direct marketing at the point at which we collect your Personal Data. You can also exercise the right at any time after we have collected and used your Personal data for direct marketing purposes by:

(a) following the opt-out instructions contained in the relevant communications; or

(b) updating your email subscriptions at [https://www.cathaypacific.com/cx/en\\_HK/membership/my-account/profile.html?tab=communication-preference](https://www.cathaypacific.com/cx/en_HK/membership/my-account/profile.html?tab=communication-preference)

### 8.3 Updating information

We will take reasonable steps to try and ensure that your Personal Data is accurate. To help us do this, please notify us of any changes to your Personal Data.

## 8.4 Contacting us

Customers requesting to exercise their rights or needing more information or clarification on specific Personal Data usage are welcome to contact us at [dpo@cathaypacific.com](mailto:dpo@cathaypacific.com) or write to us at the below mailing addresses:

The Data Protection Officer  
Cathay Pacific Airways Limited  
7<sup>th</sup> Floor Cathay Pacific City  
8 Scenic Road  
Hong Kong International Airport  
Lantau  
Hong Kong

Upon receiving your request to exercise your rights, we will take necessary measures without undue delay. Additionally, you may also request for deletion of your account with us via our call centre services. Further details are available [here](#).

## 9. Use of Cookies on Cathay Pacific Group Sites

The websites of the Cathay Pacific group companies, including [cathaypacific.com](http://cathaypacific.com) use cookies which, among other things, help us to improve your experience of our websites and to ensure that they perform as you expect them to. For detailed information on how we use cookies and the purposes for which we use them, please see our [Cookies Policy](#).

## 10. Links to Other Sites

This website contains links to other sites that are operated by third party companies with different privacy practices. You should remain alert when you leave our site and read the privacy statements of other websites. We have no control over Personal Data that you submit to or receive from these third parties.

*This notice is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.*

*This Privacy Policy was last updated on 21 November 2022. You may find the previous versions of the Privacy Policy from below:*

*The Privacy Policy applicable up to 21 November 2022 is available [here](#) *Open a new window*.*

NOTE 1 *Cathay Pacific means Cathay Pacific Airways Limited, Cathay Holidays Limited (and its subsidiaries)*