



Privacy Policy

Effective date: July 24, 2018

At Swoop we are committed to respecting your privacy. This policy describes how we collect, use and disclose personal information concerning our passengers and other individuals. We reserve the right to update or modify this policy at any time without prior notice by posting an updated version on this website. To alert you of a change, we will update the effective date of this Privacy Policy.

Who is Swoop?

For the purposes of this privacy policy, "Swoop" means Swoop Inc.

What is personal information?

Personal information is information about an identifiable individual. Your personal information includes your full name, address, telephone number, date of birth, email address, opinions, preferences, usage of Swoop's websites, and any other information that is connected to you, identifies who you are or would allow someone to contact you.

Consent

It is our policy to only collect, use and disclose personal information about you with your knowledge and consent, unless otherwise required or allowed by law. Prior to collecting personal information, it is our policy to identify the purposes for doing so and to limit the collection, use and disclosure of personal information to those purposes. Generally, we will only collect personal information from you, and use it and disclose it with your consent or from someone on your behalf. There will be occasions where we will either contact you with offers and travel services that we feel will be of interest to you and rely on your consent (implied or express) while also providing an opt-



out mechanism for such contact. We will use implied consent only in circumstances where the personal information in question is not sensitive, where the purposes and circumstances are limited and well-defined and where you are given an opportunity to opt-out or withdraw your consent then or at any time by contacting us. If we identify a new purpose for using or disclosing your personal information, unless otherwise required by law, depending upon the sensitivity of the use or disclosure of the personal information, we will update this policy and/or contact you to obtain your consent for the new use or disclosure and we may use your contact information, including your email address, to do so.

Collection of personal information

Personal information is collected by Swoop when you provide it to us, or when a third party, such as a travel agent, family member or other party books a ticket on your behalf, when a third party, such as a rewards program or a credit card services provider provides personal information to Swoop, or when certain technologies we employ on our websites or web-based applications are able to provide Swoop with information related to your interaction with various websites and other technologies. If you would like to fly with us, book a hotel or car, join a mailing list, apply for a job, participate in a program or enter a contest that may be offered by Swoop from time to time, you will be asked for personal information as described in this policy or as stated to you at the time of collection. Personal information may be collected by us through our Contact Centre, by interaction with our or other websites, web based applications, from you in person, from a travel agent or other party obtaining travel services for you on your behalf, or from a third party otherwise providing information about you on your behalf or for your benefit. We also use various computer or web-based technologies to collect and store information when you visit a Swoop site including but not limited to e-cookies, pixels and other web beacons as outlined later in this policy. It is our policy to collect personal information about you directly from you where possible or reasonable to do so. However, there are circumstances where personal information about you will be collected from a third party on your behalf.

Use of personal information



Booking a flight

When you book a flight with us, or when someone books a flight with us on your behalf, we will ask for your gender, name, address, email address, phone number, and information related to your form of payment. We collect this information in order to process your request for travel services or to process refunds. We need your gender to determine the weight and balance of our aircraft and to assist us in identifying you for legal and security purposes. We may also use your personal information to contact you about your flight, flight booking or about anything that affects or may affect your flight booking or your flight, and to notify you that a credit that you have with Swoop has been created or an existing credit is going to expire. Additionally, we may leave an automated flight status message on any phone number you provide in the event of a change or cancellation of your reserved flight. Adequate personal identification documents, including photographic likenesses, will generally be required in order to permit you to board an aircraft or access other services. This information is collected for security, legal and identification purposes and is generally returned to you immediately and not retained without your consent. Following your flight, Swoop may also use your personal information to contact you about travel services, your travel patterns and your experiences when flying with us in the form of a survey. You can opt out of this program at any time.

Requirements of government authorities

Because of the nature of the airline industry, and concerns with respect to safety and security, there may be situations in which Swoop is required or requested by legal authorities to collect, use or disclose personal information about you, particularly when you are traveling with us, without your knowledge or consent. Information that we are required to collect by any Canadian, U.S. or international government authorities, depending on your boarding location and destination, may include, as required by such authorities, your full name, date of birth, citizenship, gender, passport number and country of issuance, immigration visa number, permanent resident card number, the means by which you paid for your flight, details as to how it was booked, and any other personal information collected by us as set out in this policy or as required by such government authority. Please be advised that Swoop may disclose this personal information to authorities



when required or requested in conjunction with the identification of lawful authority. In certain circumstances where we believe unlawful or criminal activity is being committed to, on or against Swoop passengers, people or property, we may disclose your personal information to appropriate government authorities or other non-governmental entities in order to allow them to properly investigate the matter.

Cross-border information

Because Swoop flies across international borders, personal information may be made available to government authorities in Canada and the United States, as well as any other international destination, as required by law. In addition, Swoop uses third party providers of information technology, data processing, reservation services, data storage services and other services. Swoop protects personal information disclosed to such third party service providers by contractual obligations of confidentiality and non-disclosure. Personal information, including medical information covered by this Policy, may be processed or stored outside of Canada, and such personal information may therefore be or become accessible to government authorities and agencies in other jurisdictions pursuant to lawful authority made under the laws of those jurisdictions.

Special needs

Subject to certain restrictions and the Swoop Booking Terms and Conditions, Tariffs and Conditions of Carriage, services are offered to persons with special needs. A special need includes situations in which an individual may require specific requirement(s) to accommodate a disability. A special need also includes individuals who, for medical reasons, require a special arrangement in order to travel. In order to properly serve persons with special needs, to assure the health and safety of all concerned, and to ensure that an individual qualifies for any special arrangement Swoop may offer, Swoop may require additional personal information, including relevant medical information and information on particular requirements, such as whether a wheelchair, oxygen supply or other special equipment are required, information on connecting flights or connections, as well as additional contact information in the event of an emergency. In situations where an individual requires that they be accompanied by another individual,



Swoop will require personal information from that individual as a passenger on the basis set out in this Policy.

Travel agents

When you book with us through a travel agent, your travel agent will provide us with the same personal information that we would otherwise collect from you directly in order to book a flight or other travel services. Unless and until we are advised otherwise, we will consider a travel agent to have your authority to provide us with your personal information to be used and disclosed by us pursuant to this privacy policy. Collection, use and disclosure of your personal information by your travel agent will be subject to your dealings with the travel agent and their privacy policies and practices. Travel agent access to online information from Swoop is governed both by Swoop policies and by restrictions and levels of permission set up by the travel agency. Personnel in each travel agent office may be able to gain access to personal information concerning all clients and customers of the travel agency. Access to your personal information may not be limited to the individual travel agent you have dealt with as travel agents may share information. Any inquiries about another travel agency accessing your personal information should be directed to the original travel agency with whom you booked your flight.

Corporate and other third party bookings

If a third party, including a family member or friend, or your employer or another party other than a travel agent, has made or will be making a booking on your behalf, that party will provide us with the same personal information that we would otherwise collect from you directly in order to book a flight or other travel services. Unless and until we are advised otherwise, we will consider such third party to have your authority to provide us with your personal information to be used and disclosed pursuant to this privacy policy. Collection, use and disclosure of your personal information by a third party will be subject to your dealings with them and any applicable privacy policy and practices they may have. Certain employers and other parties may be granted access to online information from Swoop with respect to your booking where your employer or other party has made that booking on your behalf. Such access is also governed by our Terms of Use. Such other party,



including any others to whom it grants permission, will be able to gain access to personal information concerning all individuals for whom they have made bookings.

Passenger Feedback

By submitting your comments on Swoop's feedback section of its website, you agree that Swoop may use your comments for internal purposes such as, training or employee acknowledgment and recognition, and that Swoop may publish your comments on its Intranet or in other internal documents.

Promotional contests

Swoop may offer various promotions from time to time. When you enter a promotional contest, we ask for your name, date of birth, address (email and/or residential), social media handle and/or phone number so that we may communicate with you in the event you are a winner and so that we may verify that you are of sufficient age to participate or that you meet other eligibility requirements stated in any specific contest rules. Other information related to the promotion or contest may be requested if required by law.

Employment opportunities

Swoop offers employment opportunities in various locations, including over its website and others. If you would like to apply for a job at Swoop, you will be asked to provide your name, telephone number, address, email address, and other information concerning your application such as employment history, references and education. By submitting your application, you are consenting to the collection, use, disclosure and retention of your personal information for purposes of assessing your suitability for current and future employment opportunities at Swoop. In addition, you consent to the release of your personal information to our third party service providers for the purposes of pre-employment screening which may include a criminal background check and reference verification. If you are a successful candidate, this information will be retained by Swoop as long as reasonably required for purposes of managing your employment relationship or as otherwise required by law.



Cookies and other technology

A cookie is a small amount of data, often including a unique identifier, that is sent to your browser from a website's computer and stored on your computer's hard drive. We use "cookies" to collect and compile data. Cookies track the movements and interactions of visitors on our websites and allow us to collect information about visitor website usage patterns to better understand and meet their requirements with improved design, content, display of relevant features, and to provide you with various advertising services. Cookies also allow our websites to recognize your computer or device the next time you visit in order to provide a custom experience including remembering your choice of language, exposing you to certain website pages, and auto-filling certain forms based on your previous visit. This also allows us to automatically fill in certain fields as applicable. Swoop uses third-party advertising technology to serve ads when you visit our website and certain sites on which we advertise, using information from your visits to our website and those other sites to serve ads which are tailored to you. In the course of serving ads to you, a unique third-party cookie may be placed or recognized by your browser. In addition, we use pixels or transparent GIF files, often referred to as "web beacons", to help manage and optimize our online advertising. These are provided by external entities like Google, Facebook, and other social media companies, and enable our ad servers to recognize a browser's cookie when a browser visits our website and to learn which banner ads bring users to our website. The technology may also allow other service providers to receive information from our website related to our online advertising. With both cookies and web beacons, the information that we collect and share does not contain your name, address, telephone number, or email address. Google and other similar providers are subject to contractual restrictions with respect to personal information to protect your privacy. For more information about Google specifically, including information about how to opt-out of these technologies, go to [here](#). Additionally, you can opt out of Swoop's behavioural online advertising. To opt out of online behavioural advertising using AdChoices, click on the AdChoices Icon in a banner ad. To opt out of online behavioural advertising on Facebook, click the or on the top right corner of a Facebook ad and select 'Why am I seeing this?'

Disclosure of personal information



Swoop discloses your personal information to third parties as required to process your request for travel services, including flights, hotel and car bookings, to provide services to you, display relevant advertising, as required by applicable law, or as otherwise set out in this policy. Swoop is continuously seeking ways in which to better serve you. Swoop may therefore also disclose personal information concerning you to other organizations that may have affiliated programs to Swoop or other offers of interest to you to allow them to contact you, but Swoop will do so only with your consent, which you may withdraw at any time. Personal information provided by you or on your behalf to book flights or other travel services will generally not be provided to anyone, including a spouse, family member, friend or coworker, without your consent, or as required by law, or as otherwise provided in this privacy policy. To protect your privacy rights and personal information, and for security and legal purposes, we therefore generally cannot disclose your personal information to any individual contacting us and claiming either to be a spouse, family member, friend, coworker or otherwise entitled to your personal information, or claiming to have your consent for us to do so, unless and until we have verified with you that you do in fact consent to our disclosure of your personal information to such specified individual. The exceptions to this are: We will disclose your personal information on a reasonable basis to an individual who has booked your current flight or other travel service where that individual has adequately identified themselves. We will consider that, since they previously had your consent, express or implied, to deal with us, your consent continues. Please see Corporate and Other Third Party Bookings. We may also, with your consent, exchange your personal information, including medical information, with third party medical personnel in situations where you, or someone on your behalf, has requested special arrangements related to medical conditions or status. Please see Special Needs. Where an individual contacts us and provides us with your full name and reservation code giving us reasonable grounds to conclude they are contacting us with your consent, express or implied, we will disclose flight information to that individual for the purposes of permitting that individual to meet your flight or be aware of delays, and other similar information. Flight information is limited to flight number, flight timing information, confirmation that you have or have not boarded a flight, and the departure and arrival locations of your journey with us. Flight information is provided as a service and convenience to you to permit meeting your flight and being aware of any delays or flights that are early. We will not provide other



personal information such as home address or contact information to other individuals in these circumstances without your express consent. If you do not wish individuals to be able to obtain flight information from us, you should not share your reservation code with them. Likewise, your boarding pass contains personal information, and should be handled and disposed of in the same manner as any other personal information you may have in your possession. Otherwise, we will conclude that, where an individual has your reservation code, you have given your consent to their contacting us for your flight information. A reservation code refers to the confirmation number assigned by Swoop to for a specific flight.

Partners and related service suppliers

Swoop may provide you with the opportunity to access products and services from third parties. Those third parties may collect, use and disclose personal information from you or about you in order to provide their products or services to you. The collection, use and disclosure of personal information by those third parties will be governed by their privacy policies and any consent you provide and, unless we advise you otherwise, Swoop has no access to or control over your personal information collected from you by those third parties.

Security

Swoop has in place sophisticated security measures and procedures to ensure that your personal information is protected from misuse and from unauthorized access. However, no data transmission over the Internet can be guaranteed to be 100% secure. We cannot ensure the security of the information you transmit to us over the Internet.

Retention of information

Retention periods

Personal information collected by Swoop is retained for as long as it is reasonably required for the purposes for which it was collected, or as required by law, following which it is securely destroyed or made anonymous. If you withdraw your consent to our retaining your personal



information, we will advise you as to the consequences, if any, of your doing so.

Expiry and termination of accounts

Until your consent is withdrawn, it is our policy to keep your Swoop account open indefinitely for your convenience in the event you decide to access it again, and, if you have signed up for electronic communication, to continue sending you information until you advise us that you wish to no longer receive it. However, we do reserve the right to terminate accounts and distribution of electronic communication at any time without notice.

Accessing your personal information

Feel free to contact us if you have any questions or concerns about this policy or the accuracy and completeness of any information in your file, if you wish to update any of your information, if you would like to see a copy of the information we have on file about you, or an account of the use that has been made of your information.

To do so, simply contact Swoop privacy officer via:

- Email: privacy@flyswoop.com
- Mail: 22 Aerial Place NE, Calgary, AB, Canada T2E 3J1

You may also use the above information to withdraw any consent you have provided, or to register a concern or complaint with us. In all cases, we may require that requests for information or withdrawal of consent be received by us by email, fax, mail or otherwise in written form. We will also require that you provide sufficient information to allow us to locate your information to deal with your request.

Responding to you

All requests for access to your personal information and complaints must be provided in writing and our response will be subject to verifying your identity before replying. It is our policy to respond to all inquiries, requests for access to personal information and concerns or complaints within 30 days of our



receiving them unless otherwise allowed or required by law. If we cannot fully respond within 30 days, we will still advise you of that within 30 days.

However, we cannot give you access to personal information that we do not have, or that would disclose personal information concerning another individual without their consent, or that we otherwise cannot disclose under applicable law. There are legal restrictions in certain cases where we are prohibited from providing you with certain information. We reserve the right, to refuse to provide access to information where we are not legally required to do so, in which case we will advise you of the reasons for doing so, and of the name of a person who can answer any questions you may have.