

Privacy Policy

In accordance with the laws of the Republic of Panama and applicable international regulations regarding the protection of Personal Data (the “Applicable Law”), Compañía Panameña de Aviación, S.A. (Copa Airlines), its affiliates and subsidiaries”, hereby Medio are committed to offering the best possible service to their clients and protecting the privacy of their Personal Data and information collected through our different marketing channels. Copa Airlines guarantees that it will take all necessary measures to ensure that Personal Data and any information will be used solely for the purpose of offering a superior service through a better knowledge of the interests and needs of its customers, in accordance with the provisions of this privacy policy (the “Privacy Policy”).

For the purposes of this Privacy Policy, we use the following terms:

- “Personal Data” means any information related to natural persons that identifies them or makes them identifiable.
- “Sensitive Data” means data that refers to the intimate sphere of its owner or whose improper use could give rise to discrimination or entail a serious risk for the owner.

Copa Airlines will not sell or share, in whole or in part, the information indicated above. Personal Data will be transferred or disclosed only at the request of a competent authority. Otherwise, Copa Airlines, its affiliates and subsidiaries will only use said Personal Data and information in accordance with the purposes stipulated here, as long as they have the express consent of the data owner to do so.

All information obtained from credit card purchases through our channels will be used to complete the specific purchase for which such information was disclosed.

Our Mission: Guarantee the right to privacy of the Personal Data of our clients, employees and business partners, through compliance with the Applicable Law and any other regulations regarding the protection of personal data.

Our Vision: Maintain the trust of our clients, employees and business partners in our processes of collection, use, storage, protection, treatment and transfer of their Personal Data.

By accepting this Privacy Policy, you grant your free, express and informed consent to Copa Airlines for the collection, use, treatment, storage and transfer, in

whole or in part, of your Personal Data and/or the Personal Data of other owners who have authorized it to do so, to guarantee the provision and execution of the contracted services and for the purposes established in this Privacy Policy. The following cases constitute acceptance and, therefore, consent:

- Mark and/or indicate the checkboxes that are enabled in the reservation flows, in the purchase flows and/or on our websites.
- Acquire any of our services through our points of sale and/or customer service in non-face-to-face channels.
- For call centers, continue the call after listening to the recording about the use of Personal Data.
- As a potential Client, Traveler and User, express consent when searching or quoting your flights, products and/or services on our websites and/or call center.
- Express consent when registering as a user of our ConnectMiles Frequent Flyer program.
- Register to receive promotions and/or news about the products and/or services provided by Copa Airlines.
- Send Personal Data necessary to respond to your queries and/or complaints, through any of the enabled channels and/or make use of the Copa Airlines self-management channels and forms.
- Use our website and/or our digital channels accepting the use of cookies in order to continue browsing and accessing our content. You can manage your preferences to disable unwanted cookies.
- Provide and/or send documents such as, but not limited to, medical certificates to support trip cancellations, absences or unforeseen events, or a general medical condition that results in medical contraindications or instructions for the use of specialized medical devices.

The execution of any of the events described above will be unequivocal proof of the acceptance of this Privacy Policy and the consent given by the owner to the processing of their Personal Data by Copa Airlines. If you make your reservation through a reservation system provider ("GDS"), such as Expedia, Kayak, Booking, etc., you should review the GDS Privacy Policy.

Information we collect

We may obtain information from our customers in various ways, including information we obtain directly or information we collect from visits to our website, use of our services and/or direct interactions.

We collect Personal Data and Sensitive Data from the following categories:

- Identifiers
- Name and surname
- Contact information
- Home address
- Nationality
- Gender and date of birth
- Email address
- Number and copy of identity document (identity card, passport, other identification document)
- Phone numbers
- Payment information (for example, credit card information).
- Bank information (bank accounts)
- Internet protocol (IP) address
- Commercial information of applicant companies
- Biometric information in the boarding process
- Information about Internet or other electronic network activity
- Geolocation data
- Audio, electronic, visual, or similar information
- Professional or employment-related information
- Information about education
- Frequent Flyer Number (ConnectMiles)
- Travel preferences and special requests
- Purchase information
- User and activity data from our websites and mobile applications
- Survey responses
- Data related to health
- Contact details of third parties in emergency cases
- In-flight meal preferences

Information we collect directly from our Clients

We obtain information directly from our clients:

- When membership requests, changes or cancellation of ConnectMiles accounts are made.
- When audit investigation processes are carried out.
- When a flight reservation is made.

- When managing reservations, we provide the ability to review and make certain adjustments to online reservations, for those services we require you to provide us with additional information.
- When check-in is done online or in person.
- When the scheduled flight requires an advance passenger information form.
- When Copa Airlines invites its customers to participate in an online text chat with customer service agents to help them complete a reservation. By using this service you agree that Copa Airlines will share the information you provide with a carefully selected third party, who manages this process on our behalf.
- When telephone calls are made to our reservation centers. Telephone calls will be recorded and monitored for quality assurance, training, security and business purposes.
- When using the copa.com website.
- When picking up a package for shipment (sender contact information and delivery details)
- When a package is delivered to the recipient.
- When creating a guide to send your package or document.
- When requesting the opening of a credit account for shipping merchandise.
- When sending our invoices, making payments, resolving concerns regarding the invoice (email, telephone numbers and relevant contacts for billing and payment processing).
- When problems arise with a shipment.
- To comply with customs regulations, such as customs declarations and related documentation.
- When your package is at its destination and the address or telephone number is not correct (additional information to be able to make the delivery).
- When audit or competent authority investigation processes are carried out.
- By using copacourier.com.
- When calling our Information Centers (recording and monitoring for quality assurance, training, security and business purposes).

Additionally, confidential personal information may be requested from the passenger or other persons (provided within the reservation), such as dietary requirements or health information (if applicable). We do not request any other sensitive personal information online, but if it is provided by telephone, email or any other means, we will treat such sensitive personal information in accordance with this Privacy Policy.

How we use this information

We use the information collected to provide requested services, to administer our website and records, and to facilitate our improvement processes.

Therefore, we may keep our customers informed with important administrative or service messages and we may use the information provided to contact them, even if they have told us that they do not wish to receive direct marketing. We suggest that the information provided be as up-to-date as possible to receive the best benefits from copa.com.

The following cases are examples of how we may use this information:

- When processing an air ticket we can contact our passengers if we need more information or if there are changes to the flights.
- We may contact the passenger in order to update and/or correct a flight as requested.
- Retrieve a reservation and/or check-in online.
- Improve the travel experience.
- Help us respond to any post-flight queries.
- Help us develop technologies to provide better services in the future.
- Send ConnectMiles communications to eligible passengers.
- Send ConnectMiles program communications to eligible businesses.
- Live chat to provide assistance.
- In relationships with banks, for the credit card mileage accumulation process.
- Mileage accumulation processes with business partners
- Exchange of information with customs control agencies.
- Guarantee the effective collection and delivery of packages, create shipping labels, communicate with senders or recipients if additional data or rescheduling is required, and comply with customs requirements.
- Create a shipping guide, track and comply with customs and security regulations.
- For billing and payment processing for courier services.
- Provide information to customs.
- For internal investigations, audits and monitoring of the quality of merchandise transfer services.
- In situations in which the competent authorities require specific information, in accordance with applicable legislation.
- Manage refunds when required.
- Help us resolve any queries after shipping merchandise.

Regarding the disclosure of Sensitive Data, prior, irrefutable and explicit consent is granted to Copa Airlines to collect, process, use, store, record, organize, prepare, select, extract, compare, interconnect, associate, dissociate, communicate, assign, exchange, transmit and/or cancel said information, if necessary to satisfy any legal requirement or for security reasons.

Sensitive Data will not be sold or disclosed to any third party, except if required by law, regulation, decree, security reason.

Marketing

Email is used to provide important information to our customers. We send reservation confirmation, account information and notifications via email. ConnectMiles members will receive emails regarding special rates and offers, available services and important news. Customers always have the power to decide whether they wish to receive promotional information or not, and can opt out from their ConnectMiles profile/account.

We want to share information about other products and services, special offers, exclusive fares and other news, so that our customers can take advantage of the best that Copa Airlines has to offer. We will only use information in this way once we are given permission to do so and for the following purposes:

- Maintain contact via mail, phone and email with account updates, news, offers and special promotions.
- Share information with other companies in the Copa Holdings group and business partners so that they can stay in touch by mail, telephone and email regarding products and services of interest.
- Disclose this information to third parties, such as data processing companies, who may provide marketing services on our behalf. You will not be contacted directly by third parties as a result of your details being provided.
- Use the most recent consent given to us or the most specific consent, subject to the time it takes us to reflect these changes in our systems and/or processes.
- Ensure that customers do not receive duplicate communications, even if marketing consent has been granted to more than one Copa Holdings group company.

The customer can choose not to participate in direct marketing at any time by contacting us and/or another company in the Copa Holdings group from which they

receive direct marketing. You can also do this by choosing the “Unsubscribe” option found at the bottom of each marketing email.

If you change your mind about your marketing preferences at any time, simply log in to your account and update your consent preferences.

We disclose information to

Third parties/service providers

From time to time, we may use third party companies to manage the collection, processing, treatment and storage of Personal Data on our behalf. These companies are carefully selected and screened to ensure maximum security and privacy protection and are authorized to use the information only in accordance with our instructions.

During flight

If a medical or other emergency occurs during flight, boarding or disembarking from a Copa Airlines aircraft, the company may share customer information with doctors or other security personnel as reasonably necessary.

Transfer of information to customs and immigration agencies

The law requires Copa Airlines and other airlines to grant access to certain passenger information to the customs and immigration agencies of the different countries in which Copa Airlines operates. Consequently, any advance passenger information, including Personal Data that Copa Airlines holds regarding passengers and travel arrangements, may be disclosed to those agencies in the countries to which you are traveling.

Cross-border transfers of information

Your Personal Data may be transferred to recipients identified above for the purposes which, given the international nature of our business, may be located in countries other than your own, including countries that may not have laws protecting the use of your Personal Data and that are as strict as the laws of your country. However, the security of your Personal Data is our priority and we maintain appropriate security measures to protect it.

Safety information

Copa Airlines is committed to protecting Personal Data. We have implemented appropriate physical, administrative and technical procedures to protect personal information from loss, misuse or alteration and to ensure that it can only be accessed by those authorized by Copa Airlines.

Pay on-line

We use the latest SSL (Secure Sockets Layer) technology, which ensures that all communication between your personal device and Copa Airlines is unreadable by third parties. Details are communicated in a secure, encrypted format, allowing us to verify that the information has not been manipulated in any way.

Most browsers have some type of indicator that lets you know if a secure connection has been established. If you are unsure, please consult the browser's help section. If your browser does not support SSL technology, we recommend that you update to the latest version.

When paying for transactions carried out abroad or outside where the credit card data is registered, it is possible that the bank may block or suspend the credit card until the owner contacts them to corroborate the data. For this reason, to avoid any inconvenience during the purchase on our copa.com website, we offer the following recommendations:

1. Verify all the details of the credit card with which the purchase will be made.
2. Contact the bank before making an online purchase, to be aware of all the conditions for purchasing outside the country of residence, purchases abroad and online purchases.

Copa Airlines is not responsible if the bank does not authorize the payment corresponding to the reservation.

Links to other websites and their security and privacy policies

We also provide links to other websites on our website for convenience and information. These sites may have different security and privacy policies and we have no control over and no responsibility for any information entered on these sites.

How do we use cookies?

We want our website to be informative, personal and as user-friendly as possible and cookies help us achieve that goal.

We understand that some users prefer more individual control over their visits to our website, so you can adjust your cookie settings accordingly. Information about this process can be found in the "How to control and delete cookies" section. If you do not agree to the use of cookies, we suggest you refrain from using the website.

What are cookies?

A cookie is a small file that contains a certain amount of data that our website can send to your browser. It can then be stored on the computer's hard drive and accessed by our web server. This cookie data can be retrieved and consequently allows us to personalize our websites and services. It is important to clarify that cookies do not collect Personal Data that is stored on your hard drive or computer.

How do we use cookies?

Our website uses persistent and session cookies:

- Persistent cookies are used to allow the website to recognize users when they return to the website and remember certain information about their preferences. Persistent cookies are cookies that remain on your computer permanently or until manually deleted.
- Session cookies are used to allow customers to transmit information between different pages of the website, without having to re-enter that information. These cookies are automatically deleted when you leave the website or when you close your browser.

We have developed relationships with carefully selected and monitored partners, who assist in the delivery of a high quality website. Some of these partners may also set cookies during visits to support the customization of ads that may be seen elsewhere on the Internet and/or to fulfill contractual obligations with us.

Because these cookies do not store any personal details or credit card information, we have no access to or control over the cookies and similar technologies that our partners may use.

Third party social media cookies

To enrich our website content, we may embed video content from other social media websites such as YouTube or Facebook. As a result, when you visit a page with embedded content, cookies from these websites may be presented. Copa Airlines has no control or responsibility over these cookies and accordingly you should check the relevant third party cookie policy for more information.

Additionally, we offer a "share page" widget on some of our web pages, where content can be easily shared on the following sites: Facebook, Twitter, Pinterest, Instagram, Google+ and YouTube. These sites may set a cookie when you are logged in to their service. Copa Airlines has no control or responsibility over these cookies and accordingly you should check the relevant third party cookie policy for more information.

How to control and delete cookies

Copa Airlines will not use cookies to collect personally identifiable information without your explicit consent. However, if our cookies are disabled, rejected or blocked, some parts of our website will not function fully or in some cases our website will be completely inaccessible.

Flight Status Alerts/Wireless Services

Our customers can register for flight status alerts and other wireless services by providing basic flight information and other relevant information. Where possible, information already provided will be used for the delivery of these services. Participation in flight status alerts and other wireless services is optional.

Copa Airlines complies with the Children's Online Privacy Protection Act (COPPA).

The processing of Personal Data of minors must be carried out with the prior, specific and prominent consent granted by at least one of the parents or legal guardians.

The Personal Data of the minor may only be collected without consent when the collection is necessary to contact the parents or legal guardian, used only once and without storage, or for their protection, and in no case may they be transmitted to a third party without the consent.

Copa Airlines does not knowingly collect personal information from children under 12 years of age. If a child under 12 years of age has provided us with Personal

Data without parental or guardian consent, the parent or guardian may contact us to request deletion of such information, in addition to unsubscribing the child from any opportunity to promotion contact.

How long will we keep your information?

We will keep your Personal Data for as long as it is necessary to provide the requested services and in compliance with current regulations that require retention times for information, therefore, these data will remain stored as long as they are required by Copa Airlines.

You may revoke the consent given at any time, without this having retroactive effects. In cases where you request the revocation of your previously granted consent for some type of treatment or exercise your rights to delete or cancel your Personal Data, you should know that Copa Airlines is obliged to keep said information blocked, available to competent Authorities, during the legally established statute of limitations periods to address possible liabilities.

Client rights

In relation to Personal Data and/or Sensitive Data collected by Copa Airlines, our customers have the following rights:

- The right to know expressly, precisely and unequivocally the personal information collected by Copa Airlines and the use that will be made of that data.
- The right to non-discrimination in access, equality of services and price.
- The right to cancel your Personal Data, as long as (without this constituting an exhaustive list):
 1. They are not necessary for the management carried out by Copa Airlines.
 2. Do not affect the correct operation of Copa Airlines.
 3. Judicial or administrative actions linked to fiscal obligations, investigation and prosecution of crimes or administrative sanctions are not hindered.
 4. The applicant does not have a legal or contractual duty with Copa Airlines.
- The right of access to your Personal Data: the owner may obtain your Personal Data that is stored or subject to processing by Copa Airlines, in addition to knowing the origin and purpose for which it has been collected.

- The right to rectification of your Personal Data: Copa Airlines will provide the necessary rectification mechanisms to the owner of Personal Data who requests to correct errors, modify data that turns out to be inaccurate or incomplete, and guarantee the certainty of the information being processed.
- The right to object to your Personal Data: Copa Airlines will allow the owner of the data, for well-founded and legitimate reasons related to a particular situation, to refuse to provide their Personal Data or to have it terminated, as well as to revoke their consent. .
- The right to portability of your Personal Data: it is the right of the data owner to receive a copy of the data previously provided to the company in a structured, commonly used and machine-readable format.

To exercise your rights, you must fill out a request in the Personal Data Request Form.

Based on legal considerations, our internal policy and our data protection duty, to process a request, the identity and ownership of the required information must be proven by a legally recognized document, therefore, it is possible that you will be contacted to request additional information or documentation.

Contact information

For more details about the Personal Data and information that Copa Airlines collects about its customers, you can contact us as follows:

- For requests from government entities related to fraud, subpoenas and/or offices, write to: reservasautoridades@copaair.com
- For requests related to your ConnectMiles account: Fill out the ConnectMiles Requests form located in the Customer Service section on Copa.com
- For requests related to data privacy: Fill out the Personal Data Request Form (See previous section) or write to privacy@copaair.com. Likewise, you can request information from:
 - Telephone: TOLL-FREE line: 1-800-FLY-COPA (359 – 2672)
 - Address: Data Protection Office - Business Park, Torre Norte, Costa del Este - Panama
- For requests related to retiree discounts, name corrections or travel receipts: Fill out one of the forms in the section called Requests and Claims located in the Customer Service section on Copa.com
- For requests related to changes in the reservation or refunds: Fill out the Changes and Refunds form located in the Customer Service section on Copa.com

BRAZIL

Contact name: Data Protection Office

Email address: privacy@copaair.com

MEXICO

Email address: privacy@copaair.com

Postal Address: Boulevard Manuel Avila Camacho No. 261 Avenue, Ground Floor
Exterior Local B-03, Colonia Polanco 1st Section, Alcaldia Miguel Hidalgo in
Mexico City, C.P. 11510, Mexico.

Telephone: 52412009.

Changes to our privacy policy

Our Privacy Policy is reviewed periodically to ensure it reflects how we use information. Customers will be notified of any changes by updating this policy.

This Privacy Policy was last updated on february 21, 2024.

For more information contact Customer Service.