

JUL 20 2007

Edward Hasbrouck
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KLM Confidential

4 April 2007

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29 June 2007

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Request for personal data

Dear Mr. Hasbrouck,

With reference to our e-mail conversation, I hereby try to explain the actual process and movement of your personal data regarding your reservation, flights on board KLM Royal Dutch Airlines and disclosure to the United States Government.

Used scenario

- Mill Run Tours in San Francisco collected all required personal data from Mr. Hasbrouck to deliver the requested service. Regarding the Air transportation segment, they issued ticket 012-7825662449 (NWA ticket stock) for a KL designated and operated flight.
→ *no record available at KLM*
- The ticket was paid for by check. It is likely that NWA collected the money from Mill Run Tours and remitted it to KLM, like it does for all N.A. purchases of KLM operated flights.
→ *no record available at KLM*
- NWA received and processed Mr. Hasbrouck's Airline Reservation information through the PARS/Worldspan system from Mill Run Tours in San Francisco behalf of KLM's as its North American reservation agent. At the same time standard operational (reservation) information was forwarded from NWA to KLM in its Amadeus reservation system.
→ *see Purged PNR*
- NWA in San Francisco collected and processed the required APIS (passport) data on behalf of the US Government regarding KLM Flight 606/24 March out of the USA (SFO-AMS). Storage and processing of APIS data took place in the Departure Control section of PARS/Worldspan.
→ *no record available at KLM*
- Avia Partner in Brussels collected and processed the required APIS (passport) data on behalf of KLM for the US Government regarding KLM Flight 605/28 March into the USA (AMS-SFO). APIS data was stored and processed in KLM's Departure Control System 'Codeco'.
→ *see APIS screen prints and Selected Name List*



Conclusion

As you can conclude from the above there are/is:

- a) three different data controllers; (directive 95/46/EC article 2, definitions: d) 'controller' shall mean the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by national or community laws or regulations, the controller or the specific criteria for his nomination may be designated by national or community law;
- b) one data processor; (e) 'processor' shall mean a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- c) one third party; (f) 'third party' shall mean any natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or the processor, are authorized to process the data;

Data Controllers:

Mill Run Tours must be considered the data controller regarding the collection and processing of personal data for its own purposes (e.g. Hotel reservation, Car rental, Airline reservation, etc.).

Northwest Airlines (NWA) must be considered the data controller regarding the airline reservation process and sales of the ticket (including administrative process).

Next to this NWA was required to collect and disclose information to the US Government Authorities:

- APIS data for the flight SFO-AMS was collected directly from Mr. Hasbrouck and forwarded to US-CBP by NWA (as handling agent for KLM – no storage of data in KLM systems)

KLM Royal Dutch Airlines (KLM) must be considered the data controller for the operational process. KLM received reservation data and operational data with the purpose to fulfill the contract (ticket).

Next to this KLM was required to collect and disclose information to the US Government Authorities:

- PNR data for the flights from and to the USA.
- APIS data for the flight AMS-SFO was collected directly from Mr. Hasbrouck by Avia Partner in Brussels and forwarded to US-CBP by KLM.

Data Processor:

Avia Partner in Brussels must be considered as data processor on behalf of KLM (in KLM systems). Avia Partner did not collect or process any personal data for their own behalf.

*** PURGED PNR - NO UPDATES ALLOWED ***

1. 1HASBROUCK/EDWARDMR

NO ACTIVE SEGS

OWNER-KL AABJJU

OWNER-1A

SUPPLEMENTARY INFORMATION

001 FQTV HK/ KL NW380562313

N1 -1HASBROUCK/EDWARDMR

002 KL CTCT SFO415 977 7100 A

003 KL CTCP SFO415 977 7150 FAX

MARRIED SEGMENT CONTROL INFORMATION EXISTS *MSC

FONE-001 HDQAAHCMIJZ/9WE0/05703294/SFO/AA/T/US

RMKS-001 *CRCKL*SFOAMS/K/24MAR-OK

002 *CRCKL*BRUSFO/L/28MAR-MSC OK

History

RCVD-HDQAAHCMIJZ/9WE0/05703294/SFO/AA/T/US

HDQ AA RM 2034Z/23MAR

AN.1HASBROUCK/EDWARDMR

AS. KL	606 K	24MAR	SFOAMS DK/HK1	1620 1155	M	S
AS. KL	1720 T	28MAR	BRUAMS DK/HK1	0615 0710	M	1
AS. KL	605 T	28MAR	AMSSFO DK/HK1	1110 1305	M	1S

RCVD-HDQAAHCMIJZ/9WE0/05703294/SFO/AA/T/US

HDQ RM AA 2034Z/23MAR TTY

XS. KL	1720 T	28MAR	BRUAMS HK1	0615 0710	M	
XS. KL	605 T	28MAR	AMSSFO HK1	1110 1305	M	S
AS. KL	1722 L	28MAR	BRUAMS DK/HK1	0825 0920	M	2
AS. KL	605 L	28MAR	AMSSFO DK/HK1	1110 1305	M	2S

RCVD-HDQAAHCMIJZ/9WE0/05703294/SFO/AA/T/US

HDQ RM AA 2048Z/23MAR TTY

ASI.KL 606M24MAR HK 15J NW 1HASBROUCK/EDWARDMR

ASI.KL 605M28MAR HK 31A NW 1HASBROUCK/EDWARDMR

RCVD-HDQAAHCMIJZ/9WE0/05703294/SFO/AA/T/US

HDQ RM AA 2129Z/23MAR TTY

RCVD-HDQNW

ATL RM 1P 2145Z/23MAR ETKT UPDATE

RCVD-HDQAAHCMIJZ/9WE0/05703294/SFO/AA/T/US

HDQ RM AA 2145Z/23MAR TTY

CRCKL RC 1S 1103Z/24MAR EOT

RCVD-HDQNW2ZNO5I 111111/MSP NW A 24050246PDDD1 CNUS

HDQ RM NW 2041Z/24MAR ADL EVENT TRIGGERED TTY

RCVD-HDQNW

ATI. RM 1P 2042Z/24MAR ADL EVENT TRIGGERED ETKT UPDATE

RCVD-HDQNW

ATL RM 1P 2042Z/24MAR ADL EVENT TRIGGERED ETKT UPDATE

1	KL	606 K	SA 24MAR	SFOAMS HK1	1620 1155#1	M	S
2	KL	1722 L	WE 28MAR	BRUAMS HK1	0825 0920	M	
3	KL	605 L	WE 28MAR	AMSSFO HK1	1110 1305	M	S

Messages

20:34:12 I 172.21.224.1
V.
VHLG.UC/E1AARPNR/I1KLRPNR/P0376A0004
VGYA
UNB IATA:1 AA KL 070323:1534 1F8DD309840003
UNH 2929 HWPREQ:96:2:IA 4DDFEEC14C26/E99E43
MSG :56
ORG AA 05703294:9WE0 SFO T US:USD A15
RCI AA:HCMIJZ
LTS
QU AMSRMKL
.HDQRMAA 232034/DK4DDFEEC14C26/E99E43
HDQAA HCMIJZ/9WE0/05703294/SFO/AA/T/US
1HASBROUCK/EDWARD MR
KL606K24MAR SFOAMS DK1/1620 1155/1
KL1720T28MAR BRUAMS DK1/0615 0710.1.
KL605T28MAR AMSSFO DK1/1110 1305.1.
OSI KL CTCT SFO415 977 7100 A
OSI KL CTCP SFO415 977 7150 FAX

UNT 6 2929
UNZ 1 1F8DD309840003

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V.
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UNH 6633 HWPREQ:96:2:IA 4DDFEEC14C2B/E9A657
MSG :57
ORG AA 05703294:9WE0 SFO T US:USD A15
RCI AA:HCMIJZ KL:SYLSFU
LTS
QU AMSRMKL
.HDQRMAA 232048/DK4DDFEEC14C2B/E9A657
HDQAA HCMIJZ/9WE0/05703294/SFO/AA/T/US
1HASBROUCK/EDWARD MR
KL1720T28MAR BRUAMS XX1
KL605T28MAR AMSSFO XX1
KL606K24MAR SFOAMS HK1
KL1722L28MAR BRUAMS DK1/0825 0920.2.
KL605L28MAR AMSSFO DK1/1110 1305.2.

UNT 6 6633
UNZ 1 1F8DD30AC00002

21:29:48 T QD HDQRMAA
.AMSRMKL 232129
TRL
HDQAA HCMIJZ
AMSKL SYLSFU
1HASBROUCK/EDWARDMR
KL0606K24MAR SFOAMS HK1
KL0605L28MAR AMSSFO HK1
SSRSEATKLKK1SFOAMS0606K24MAR.15JN/RS
SSRSEATKLKK1AMSSFO0605L28MAR.31AN/RS

21:29:49 O QD HDQRMAA
.AMSRMKL 232129
TRJ
HDQAA HCMICZ
AMSKL SYLSFU
1HASBROUCK/EDWARDMR
KL0606K24MAR SFOAMS HK1
KL0605L28MAR AMSSFO HK1
SSRSEATKLKK1SFOAMS0606K24MAR.15JN/RS
SSRSEATKLKK1AMSSFO0605L28MAR.31AN/RS
400

21:45:31 I 172.21.86.2
V.
VHLG.WA./E11PEL/I1KLEL/P0037
VSYA
UNB IATA:1 1P KL C70323:2145 060D29
UNH 1 SSRREQ:C98:001:AT
ORG NW 570324:9WE0 AA NW T US AJG
RCI KL:SYLSFU:1 AA:HCMIJZ:1
ODI
TVL 240307 SFO AMS KL:KL 606:K
RPI OK
TIF HASBROUCK EDWARDMR
SSR 700:I::KL::SFO:AMS:0127825662449C1
TVL 280307 BRU AMS KL:KL 1722:L
RPI OK
TIF HASBROUCK EDWARDMR
SSR 700:J::KL::BRU:AMS:0127825662449C3
TVL 280307 AMS SFO KL:KL 605:L
RPI OK
TIF HASBROUCK EDWARDMR
SSR 700:I::KL::AMS:SFO:0127825662449C4
UNT 17 1
UNZ 1 060D29

21:45:41 I QP AMSRMKL
.HDQRMAA 232145
HDQAA HCMIJZ/9WE0/05703294/SFO/AA/T/US
1HASBROUCK/EDWARD MR
KL606K24MAR SFOAMS HK1
KL1722L28MAR BRUAMS HK1.2.
KL605L28MAR AMSSFO HK1.2.
SSR TKNE KL HK1 SFOAMS0606K24MAR.0127825662449C1
SSR TKNE KL HK1 BRUAMS1722L28MAR.0127825662449C3
SSR TKNE KL HK1 AMSSFO0605L28MAR.0127825662449C4

1*** S E L E C T E D N A M E L I S T ***

DATE=28MAR07 EPT=BRU FLTNR=KL1722

Obs	NAME	I	NP	S	TIME	OPT	STATUS	CLS	CP	REF	A	SR	COL	WGT	PSN	QEDIT	SEDT	TCI	INFLNR	
2	HASBROUC_K	E	1	M	6:40	AMS	ACCEPTED	M	OK	12F		N	1	14						
Obs	ONFLNR	SPML	COM	PNRADD	LNIATA	AC1	AG1	AC2	AG2	I	AGT	FPT	SPML	OAFI			KLFT			CHK
2	KL 0605			SYLSFU	F53209	0		0		T8	.	.		380562313						38
Obs	RMKS1	RMKS2	RMKS3	TDR	PFR															BC
2																				Y

COMMENT

DATE=28MAR07 BPT=AMS FLTNR=KL0605

Obs	NAME	I	NP	S	TIME	OPT	STATUS	CLS	CP	REF	A	SR	COL	WGT	PSN	QEDIT	SEDT	TCI	INFLNR	
1	HASBROUC_K	E	1	M	6:40	SFO	ACCEPTED	M	OK	31A	A	N	1	14		JA		BRU	KL 1722	
Obs	ONFLNR	SPML	COM	PNRADD	LNIATA	AC1	AG1	AC2	AG2	I	AGT	FPT	SPML	OAFI			KLFT			CHK
1				SYLSFU	F53209	0		0		T8	.	.		380562313						359
Obs	RMKS1	RMKS2	RMKS3	TDR	PFR															BC
1																				Y

COMMENT

NAD FL HASBROUCK: EDWARD

ATT 2 M

DTM 329: **REDACTED DATE OF BIRTH**

LOC 22 SFO

LOC 178 BRU

LOC 179 SFO

LOC 174 USA

NAT 2 USA

RFF AVF:SYLSFU

DOC P: 110:111 **REDACTED PASSPORT NUMBER**

DTM 36:150223

LOC 91 USA