

	Issue 1/08.08.2025 Page1 from 5	Aero Tehnik BG Ltd. Sofia, Bulgaria 1839 Vrazhdebna, Str. 8, Heli Air Services buildings area Sofia Airport, North Area
---	------------------------------------	--

APPROVED:



Georgi Kanchev
Manager

**POLICY ON CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA
processed by Aero Technic BG Ltd. in connection with the control of access to
its premises
("Privacy Policy")**

Aero Technic BG Ltd. respects the privacy of individuals visiting the premises of Aero Technic BG Ltd. for various purposes – administrative offices, technological premises, and others, hereinafter referred to as "premises" – and guarantees the maximum protection of their personal data processed in connection with their access and visit there.

This Privacy Policy is based on the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**Regulation (EU) 2016/679**").

All amendments and additions to the Privacy Policy will be applied after the publication of its current content, available on our website: www.aerotechnic-bg.com

1. Who processes and is responsible for your personal data

- Aero Technic BG Ltd. is a commercial company registered in the Commercial Register of the Registry Agency with UIC 201431105.
- Aero Technic BG Ltd. is a personal data controller within the meaning of Regulation (EU) 2016/679 and the Personal Data Protection Act.
- Aero Technic BG Ltd. collects, processes, and stores your personal data under the terms of this Privacy Policy.
- You can contact us at our registered office: Sofia, Kremikovtsi district, postal code 1839, ZhK. Vrazhdebna, Sofia Airport, 8 Heli Air Hangar.
- For all questions related to the processing of your personal data, you can also contact the data protection officer at Aero Technic BG Ltd. at the following contact details: email: dpo@erotechnic-bg.com ; tel. + 359 888488101

Privacy and personal data protection policy processed by Aero Technic BG Ltd. in connection with the control of access to its facilities

This product is the property of Aero Technic BG Ltd. All copyrights are reserved and copying and distribution without the prior written consent of the copyright holder is prohibited. Violators will be held liable under the law.

	Issue 1/08.08.2025 Page2 from 5	Aero Tehnik BG Ltd. Sofia, Bulgaria 1839 Vrazhdebna, Str. 8, Heli Air Services buildings area Sofia Airport, North Area
---	------------------------------------	--

2. What data do we process, for what purposes, and on what legal basis?

On the basis of our legitimate interest as the owner or user of our facilities, Aero Technic BG Ltd. controls access and/or security, which includes: ***video surveillance, checking visitors' identity documents, their luggage, motor vehicles (MV) and their accompanying documents, issuing prior access permits, issuing prior access permits upon request to visit a specific facility.*** Depending on the type of site and its strategic importance to Aero Technic BG Ltd., its security may include all or a combination of the measures listed in the previous sentence.

The purposes of the established access control regime are your unambiguous identification, protection of our property, and ensuring the undisturbed performance of the duties of our workers, employees, and contractors.

To achieve these objectives, Aero Technic BG Ltd. processes the following categories of personal data:

- ***Full names and personal identification numbers of visitors - individuals who are not employees of Aero Technic BG Ltd. when visiting certain technological and other facilities with access control, extracted with a card reader and/or manually recorded in an information system for storage and/or manually recorded in a paper logbook;***
- ***Full names and ID card numbers or just full names of visitors who are representatives of contractors of Aero Technic BG Ltd. when issuing permits for access to sites and premises;***
- ***Vehicle number and make, manually recorded in a logbook;***
- ***Data, including personal data, contained in the accompanying documents of the vehicle's cargo or personal luggage, which are reviewed, not recorded, or stored;***

Image (video recording) of visitors during their visit and stay at the sites, made with video surveillance equipment that captures visitors and records the data obtained.

3. Categories of third parties who have access to and process your personal data:

3.1. Personal data processors who, on the basis of a contract with Aero Technic BG Ltd., process your personal data on behalf of Aero Technic BG Ltd.

- Persons who, on behalf of **Aero Technic BG Ltd.**, perform security activities at the central office and other sites and who use the card reader – extract or manually record the above-mentioned personal data.

3.2. Other personal data administrators to whom Aero Technic BG Ltd. provides your personal data in compliance with its legal obligation to provide information.

Privacy and personal data protection policy processed by Aero Technic BG Ltd. in connection with the control of access to its facilities

This product is the property of Aero Technic BG Ltd. All copyrights are reserved and copying and distribution without the prior written consent of the copyright holder is prohibited. Violators will be held liable under the law.

	Issue 1/08.08.2025 Page3 from 5	Aero Tehnik BG Ltd. Sofia, Bulgaria 1839 Vrazhdebna, Str. 8, Heli Air Services buildings area Sofia Airport, North Area
---	------------------------------------	--

- **Competent authorities** which, by virtue of a normative act, have the power to request from Aero Technic BG Ltd. to provide information, including personal data, such as a Bulgarian court or a court of another country, various supervisory/regulatory authorities – the Consumer Protection Commission, the Personal Data Protection Commission, authorities with powers to protect national security and public order, including but not limited to the police, Ministry of Interior, Prosecutor's Office, State Agency for National Security, and others when investigating confirmed illegal intrusion and/or damage to property in the central office and/or harm to persons located therein, as well as other incidents and disclosure of the perpetrators of such unlawful acts.

4. How long is your personal data stored?

- Your personal data specified above and recorded (by card reader or manually) in the information system when visiting the relevant sites is stored by Aero Technic BG Ltd. **for a period of 3 months or another period determined by the competent authorities to which the data is provided under item 3.2.;**
- Your personal data specified above, downloaded with a card reader and recorded in the information system at strategic technological sites, is stored for up to 2 years from its receipt;
- **Video recordings** made during visits to the site(s) of Aero Technic BG Ltd. using video surveillance equipment shall be stored **for a period of up to 60 days from the date of creation of the recording.**
- In the event of an incident, theft, or violation of the privacy of employees or property of Aero Technic BG Ltd., as well as for the purpose of preserving evidence in connection with civil, administrative, or criminal proceedings and providing it to the competent authorities, video recordings may be stored for a longer period.

5. What are your rights in relation to the processing of personal data by Aero Technic BG Ltd. You have the following rights in relation to your personal data:

- 5.1. **to access** your personal data and information of the type included in this Privacy Policy with regard to the data in question. You may request information from **Aero Technic BG Ltd.** about whether and for what purposes we process your personal data;
- 5.2. access to personal data contained in **video recordings:**

Privacy and personal data protection policy processed by Aero Technic BG Ltd. in connection with the control of access to its facilities

This product is the property of Aero Technic BG Ltd. All copyrights are reserved and copying and distribution without the prior written consent of the copyright holder is prohibited. Violators will be held liable under the law.

	Issue 1/08.08.2025 Page 4 from 5	Aero Technic BG Ltd. Sofia, Bulgaria 1839 Vrazhdebna, Str. 8, Heli Air Services buildings area Sofia Airport, North Area
---	-------------------------------------	---

- if the storage period of the video recording has expired, Aero Technic BG Ltd. will provide you with information that the data is not being processed;
- if the video recording contains, in addition to your data, data of third parties that cannot be anonymized, access to it may be denied to you in order to protect the rights, freedoms, and data of those third parties;
- If you want access to your data contained in video recordings, you should specify the location and approximate time interval, not longer than 2 hours.

5.3. You may request that your personal data be **deleted** only in any of the following cases:

- it is no longer necessary for the purposes for which it is processed;
- you have objected to their processing and there is no other reason for their processing;
- the processing of the data has been found to be unlawful;
- national or European legislation requires it;

5.4. request that **the processing** of your personal data be **restricted** in any of the following cases:

- unlawful processing has been established, but you only want the processing of your data to be restricted instead of deleted;
- you wish your personal data to be stored even though **Aero Technic BG Ltd.** no longer needs it for the purposes of processing, as you will use it to establish, exercise, or defend your legal claims;
- if you have objected to the processing of your personal data for the duration of the verification of its validity;

5.5. **you object to Aero Technic BG Ltd. at any time** and for your personal reasons in view of the specific situation, against the methods of processing personal data specified in this Privacy Policy.

Upon receipt of an objection to the processing of your personal data, **Aero Technic BG Ltd.** will respond to you within a reasonable time, but no longer than one month, whether it finds the objection to be justified and, accordingly, whether it will cease processing the relevant personal data for these purposes.

5.6. You may send **a complaint** to the Personal Data Protection Commission if you believe that your rights in relation to the processing of your personal data have been violated.

6. How can you exercise your rights under the previous point?

To exercise your rights related to the processing of your personal data by **Aero Technic BG Ltd.**, simply submit your request in writing and send it to one of the contact points listed in point

Privacy and personal data protection policy processed by Aero Technic BG Ltd. in connection with the control of access to its facilities

This product is the property of Aero Technic BG Ltd. All copyrights are reserved and copying and distribution without the prior written consent of the copyright holder is prohibited. Violators will be held liable under the law.

	Issue 1/08.08.2025 Page5 from 5	Aero Tehnik BG Ltd. Sofia, Bulgaria 1839 Vrazhdebna, Str. 8, Heli Air Services buildings area Sofia Airport, North Area
---	------------------------------------	--

1 of this Privacy Policy. Your request should contain sufficient data to enable you to be unambiguously identified and contact details – address and/or email for feedback.

Aero Technic BG Ltd. will review your request in a timely manner and respond to you.

Depending on the request and in order to fulfill the obligations of **Aero Technic BG Ltd.** to protect your personal data from unauthorized disclosure, as well as to ensure your unambiguous identification, **Aero Technic BG Ltd.** has the right to determine another way to exercise your rights, including requesting that you submit your application in person and/or deliver the written response in person.

7. Can you refuse to provide personal data to Aero Technic BG Ltd. and what are the consequences of doing so?

In order to control access to our facilities, we need certain data that is necessary for the realization of our legitimate interest.

If you refuse to provide the personal data required for the issuance of an access permit and/or to identify yourself to the security personnel at the relevant premises of Aero Technic BG Ltd. in the manner specified in this Privacy Policy, you will be denied access to the facility.

This policy was last updated on August 8, 2025.

Privacy and personal data protection policy processed by Aero Technic BG Ltd. in connection with the control of access to its facilities

This product is the property of Aero Technic BG Ltd. All copyrights are reserved and copying and distribution without the prior written consent of the copyright holder is prohibited. Violators will be held liable under the law.