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APPROVED:



Georgi Kanchev
Manager

Impact Assessment Procedure

1. Scope

All projects that involve the processing of personal data or any activities, internal or external, that affect the processing of personal data and the privacy of data subjects fall within the scope of this procedure and will be subject to a Privacy Impact Assessment (PIA).

2. Responsibilities

2.1 The Data Protection Officer is responsible for carrying out the necessary checks on the security of personal data to determine the need for an impact assessment.

2.2 The Data Protection Officer is responsible for verifying the appropriate control measures to mitigate the risks identified as part of the impact assessment process and the subsequent decision to proceed with the processing.

2.3 The Executive Director shall be responsible for implementing the identified solutions to mitigate the confidentiality risk.

3. Procedure

3.1 The Data Protection Officer identifies the need for an impact assessment at the start of each project, assessing the project and the type of personal data or processing activities.

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3.2 Using the criteria below, in accordance with the probability and impact matrix, Aero Technic Ltd. (the "Organization") determines the risks to the rights and freedoms of data subjects as:

Probability	3	0	3	6	9
	2	0	2	4	6
	1	0	1	2	3
		0	1	2	3
		Impact			

Risks to the rights and freedoms of data subjects:

Risk level	From	To	Established by the DPO
High	6	9	Highest Unacceptable risk
Medium	3	5	Unacceptable risk
Low	1	2	Acceptable risk
Zero	0	0	No risk

4. Register of processed categories of personal data

4.1 The organization records key information about the personal data processed in the ("G. GDPR register under Article 30 of the activities related to the processing of personal data as a Controller"). This includes a description of the processing and the purposes; legitimate interests pursued by the controller; assessment of the necessity and proportionality of the processing; assessment of the risks to the rights and freedoms of data subjects (in accordance with the matrix and risk level definitions in section 3.2 above).

4.2 The organization summarizes the type of processing activity related to the personal data being processed.

They are categorized as:

- Collection;
- Transfer;
- Storage;
- Access;
- Erasure.

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4.3 The organization establishes the legitimate grounds for processing the data and the appropriate storage period.

4.4 The organization identifies the category of data processed, whether specific or relating to a minor, as well as the format of the data.

4.5 The organization identifies who has access to the data (individuals, teams, third parties, or processors) by recording the geographic location of the place where the processing takes place.

5. Determining confidentiality risks

5.1 The organization assesses the risks to confidentiality for each processing activity by:

5.1.1 Identifying and describing the confidentiality risk associated with that activity;

5.1.2 Using probability criteria (1 - low, 2 - medium, and 3 - high), the probability of risk occurrence is taken into account;

5.1.3 Using the impact criteria (0 - zero impact, 1 - low, 2 - medium, and 3 - high), the impact of the risk is determined.

5.1.4 Risk determination, i.e. identification of the risk to the rights and freedoms of data subjects.

5.2 When assessing the risks to privacy, the organization shall take into account:

- the risks to the rights and freedoms of individuals arising from the processing of personal data;
- risks to the business (including reputational damage); and
- its objectives and obligations (regulatory and contractual).

5.3 The organization shall identify the necessary solutions to reduce the risks to privacy, assign the person responsible for a given processing operation to implement them, and set a deadline.

5.4 The organization shall prioritize the analyzed risks for risk treatment based on the risk level criteria set out in point 3.2 above.

6. Prior consultation (Article 36, GDPR)

6.1 Where the impact assessment determines that the processing of personal data will result in a high risk to the data subject and there are no adequate measures in place to mitigate the risk and exercise control, the organization shall consult the supervisory authority.

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6.2 When the Organization requests consultation from the supervisory authority, it shall provide the following information:

6.2.1 Details of the roles of the company (as Controller, Processor, or Joint Controller) and the roles (as Controller, Processor, or Joint Controller) of others involved in the processing;

6.2.2 Purpose of the intended processing;

6.2.3. A detailed description of all measures and controls to protect the rights and freedoms of data subjects;

6.2.4 Contact details of the Data Protection Officer;

6.2.5 Copy of the data protection impact assessment; and

6.2.6 Any other information requested by the supervisory authority.

The Data Protection Officer is responsible for compliance with the rules set out in this document and its updating.

The current version of this document is available to all staff.

This procedure has been approved by the Manager.

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