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APPROVED:



Georgi Kanchev
Manager

Personal data management system related to

Regulation (EU) 2016/679 of the European Parliament and of the Council 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

(General Data Protection Regulation, GDPR)
(General Data Protection Regulation, GDPR)
(GDPR)

Policy Commitment Statement

To support compliance with Regulation (EU) 2016/679, the Executive Director has approved the development, implementation, maintenance, and continuous improvement of a documented Personal Information Management System (PIMS) for Aero Technic BG Ltd.

All employees of Aero Technic BG Ltd. and certain external persons identified in the PIMS are expected to comply with this policy. All employees, as well as certain external persons, will receive appropriate training. The consequences of violating this policy are set out in the Code of Ethics of Aero Technic BG Ltd. and in contracts and agreements with third parties.

In determining its scope for compliance with Regulation (EU) 2016/679, Aero Technic BG Ltd. has considered and taken into account the potential impact of:

- any external and internal issues that are relevant to the objectives of Aero Technic BG Ltd. and that affect its ability to achieve the desired results of its PIMS;
- the specific needs and expectations of interested parties that are relevant to the implementation of the PIMS;
- organizational objectives and obligations;
- acceptable levels of risk; and

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- all applicable legal, regulatory, or contractual obligations.

The objectives of Aero Technic BG Ltd. for compliance with Regulation (EU) 2016/679 and PIMS:

- are consistent with this policy;
- are measurable;
- take into account Regulation (EU) 2016/679 and the results of the risk assessment and risk treatment;
- are monitored;
- are communicated;
- are updated as necessary.

To achieve these objectives, Aero Technic BG Ltd. has determined:

- what will be done;
- what resources will be needed;
- who will be responsible;
- when it will be completed;
- how the results will be evaluated.

3. Responsibilities and roles under the General Data Protection Regulation (Regulation (EU) 2016/679)

3.1 Aero Technic BG Ltd. is a Data Controller or, in some cases, a Data Processor, in accordance with Regulation (EU) 2016/679.

3.2 Top management and all persons in leadership roles are responsible for developing and promoting good practices for information processing at Aero Technic BG Ltd. Responsibilities are specified in individual job descriptions.

3.3 The data protection officer is responsible, as defined in Regulation (EU) 2016/679, for the management of personal data within Aero Technic BG Ltd. and for ensuring compliance with data protection legislation and good practices.

This responsibility includes:

- 3.3.1 developing and implementing Regulation (EU) 2016/679 as required by this policy;
- and
- 3.3.2 managing security and risk in relation to compliance with the policy.

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3.4 A Data Protection Officer, whom the Executive Director considers to be suitably qualified and experienced, has been appointed to take responsibility for Aero Technic BG Ltd.'s compliance with this policy on a day-to-day basis and, in particular, is directly responsible for compliance with the requirements of Regulation (EU) 2016/679 at Aero Technic BG Ltd.

3.5 The Data Protection Officer has specific responsibilities with regard to requests for information under Regulation (EU) 2016/679 and is the point of contact for employees who seek clarification on any aspect of data protection compliance.

3.6 Compliance with data protection legislation is the responsibility of all employees of Aero Technic BG Ltd. who process personal data.

3.7 The training program of Aero Technic BG Ltd. ("*3. Training Program*") specifies training on Regulation (EU) 2016/679 and specific requirements and awareness regarding the functions performed by employees of Aero Technic BG Ltd.

3.8 Employees of Aero Technic BG Ltd. must ensure that all personal data about them, as well as those provided to Aero Technic BG Ltd., are accurate and up to date.

4. Data protection principles (Article 5)

All processing of personal data must be carried out in accordance with the data protection principles set out in Article 5 of Regulation (EU) 2016/679. The policies and procedures of Aero Technic BG Ltd. are designed to ensure compliance with these principles.

4.1 Personal data must be processed **lawfully, fairly, and transparently**.

1) Lawful – The legal basis must be identified before personal data is processed. This is referred to as the "grounds for processing."

2) Fair – In order for processing to be fair, the data controller must provide certain information to data subjects, as far as this is practicable. This applies regardless of whether the personal data has been obtained directly from the data subjects or from other sources.

Regulation (EU) 2016/679 increases the scope of requirements for what information should be made available to data subjects with regard to the requirement for "transparency."

3) Transparency - Regulation (EU) 2016/679 includes rules on providing information about personal data to data subjects in Articles 12, 13, and 14. These are detailed and specific, emphasizing that privacy policies should be understandable and accessible, in clear and simple language.

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The privacy policy of Aero Technic BG Ltd. (Privacy notice) is set out in ["7. *Privacy Policy*"].

The specific information that must be provided to the data subject is:

- 4.1.1 the identity and contact details of the controller and, where applicable, the controller's representative;
- 4.1.2 the contact details of the Data Protection Officer;
- 4.1.3 the purposes of the processing for which the personal data are intended, as well as the legal basis for the processing;
- 4.1.4 the period for which the personal data will be stored;
- 4.1.5 the existence of rights to request access, rectification, erasure, or objection to the processing and the grounds for exercising those rights, such as whether the lawfulness of previous processing will be affected;
- 4.1.6 the categories of personal data concerned;
- 4.1.7 the recipients or categories of recipients of personal data, where applicable;
- 4.1.8 where applicable, the controller intends to transfer personal data to a recipient in a third country and the level of protection afforded to the data;

4.2 Personal data may only be collected for specific, explicit, and legitimate purposes.

4.3 Personal data must be adequate, relevant, and limited to what is necessary for processing (data minimization).

- 4.3.1 The data protection officer is responsible for ensuring that Aero Technic BG Ltd. does not collect information that is not strictly necessary for the purpose.
- 4.3.2 All data collection forms (electronic or paper), including data collection requirements in new information systems, must be included in the Privacy Policy and approved by the Data Protection Officer.
- 4.3.3 The Data Protection Officer will ensure that, on an annual basis, all data collection methods are audited to ensure that the data collected continues to be adequate, relevant, and not excessive. Data Protection Impact Assessment Procedure ["8. *Impact Assessment Procedure*"].

4.4 Personal data must be accurate and up to date. When information about a change is received, it must be corrected in a timely manner.

- 4.4.1. Data stored by the personal data controller must be reviewed and updated as necessary.

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4.4.2 The data protection officer is responsible for training all employees on the collection of accurate data and keeping it up to date.

4.4.3 The data subject must also ensure that the data stored by Aero Technic BG Ltd. is accurate and up to date.

4.4.4 All data subjects (employees, customers, and others) are required to notify Aero Technic BG Ltd. of any changes in circumstances so that personal data records can be updated. The instructions for updating records are part of the procedures related to how personal data is stored.

It is the responsibility of Aero Technic BG Ltd. to ensure that action is taken when notification of a change in circumstances is received.

4.4.5 The data protection officer is responsible for ensuring that appropriate procedures and policies are in place to maintain the accuracy and currency of personal data, taking into account the volume of data collected, the speed at which it may change, and other relevant factors.

4.4.6 At least on an annual basis, the Data Protection Officer reviews the retention dates of all personal data processed by Aero Technic BG Ltd. by taking inventory of the data and identifying any data that is no longer required in the context of the registered purpose. This data will be securely destroyed in accordance with the procedure for secure destruction of storage media (E. Procedure for secure destruction of information media).

4.4.7 The data protection officer shall take action without undue delay upon receipt of requests for correction from data subjects and shall notify them in a timely manner ("A. Procedure for working with citizens on issues related to their personal data, Appendix No. 2 Procedure for removing inconsistencies and corrective actions"). If Aero Technic BG Ltd. decides not to comply with the request, the Data Protection Officer shall respond to the data subject, explaining the reasons for the decision and informing them of their right to lodge a complaint with the supervisory authority or seek judicial protection.

4.4.8 The data protection officer is responsible for implementing appropriate safeguards when interacting with third parties (processors) to enable the synchronization of information, for example: when the data is inaccurate or out of date, to inform them, as well as to transmit any correction of personal data to the third party when required.

4.5 Personal data must be stored in such a way that the data subject can be identified when necessary for processing.

4.5.1 When personal data is stored beyond the end date of processing, it will be anonymized to protect the identity of the data subject in the event of a data security breach.

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4.5.2 Personal data shall be stored in accordance with the Record Retention Procedure and, once the retention date has been reached, it must be securely destroyed as specified in that procedure.

4.5.3 The Data Protection Officer must specifically approve any storage of data that exceeds the retention periods specified in the Archive Storage Procedure and must ensure that the justification is clearly identified and complies with the requirements of data protection legislation. This approval must be in writing.

4.6 Personal data must be processed in a manner that ensures appropriate security.

The Data Protection Officer shall carry out a risk assessment taking into account all circumstances relating to the processing activities of Aero Technic BG Ltd.

When determining appropriateness, the Data Protection Officer must also consider the degree of potential harm or loss that could be caused to individuals if a security breach occurs.

When assessing **appropriate technical measures**, the Data Protection Officer shall take into account:

- Password protection;
- Automatic locking of unused computers;
- Removal of access rights for portable media such as USB drives, disks, and others;
- Virus scanning software and firewalls;
- Role-based access rights, including for users appointed for a specific period;
- Encryption of portable devices that are taken outside the organization's premises, such as laptops, tablets, smartphones, and others;
- Security of local and external networks;
- Technologies to improve confidentiality, such as pseudonymization and anonymization;
- The relevant international security standards applicable to Aero Technic BG Ltd.

When assessing **appropriate organizational measures**, the Data Protection Officer will take into account:

- The appropriate levels of training at Aero Technic BG Ltd.
- Measures that take into account the reliability of employees;
- The inclusion of data protection in employment contracts;
 - Identification of disciplinary measures for data breaches;
 - Monitoring of staff for compliance with relevant security standards;

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- Controlling physical access to electronic and paper records;
- Adopting a clear service policy;
- Storing paper records in lockable fireproof cabinets;
- Restricting the use of portable electronic devices outside the workplace;
- Restricting the use of personal portable devices and, where necessary, implementing an appropriate bring your own device (BYOD) policy;
- Adopting and implementing clear password policies;
- Maintaining regular backups of personal data and storing media outside the main site;
- Applying appropriate contractual obligations and security measures when transferring data outside the European Union.

The controls applied are selected based on the identified risks to personal data and the likelihood of harm to individuals whose data is being processed.

Compliance with this principle by Aero Technic BG Ltd. is contained in the information security policy.

4.7 The personal data controller must be able to demonstrate compliance with the other principles of Regulation (EU) 2016/679, i.e. to fulfill the accountability requirement.

Regulation (EU) 2016/679 includes provisions that promote accountability and governance. They complement the transparency requirements of Regulation (EU) 2016/679.

The accountability principle in Article 5(2) requires the controller to be able to demonstrate compliance with the principles and declares that this is its responsibility.

Aero Technic BG Ltd. will demonstrate compliance with data protection principles by implementing data protection policies, complying with codes of conduct, implementing technical and organizational measures, and adopting techniques such as data protection for each project, risk and impact assessments, breach notification procedures, and incident response plans.

5. Rights of data subjects

5.1 Data subjects have the following rights with regard to data processing. They may:

- 5.1.1 To request information about the nature of the data stored about them and to whom it has been disclosed.
- 5.1.2 To request the termination of processing that may cause damage to the data subject.
- 5.1.3 To request the cessation of processing for direct marketing purposes.
- 5.1.4 To request to be informed about the mechanism of the automated decision-making process that significantly affects them.
- 5.1.5 To object to decisions that are significant to them being made by an automated process.

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5.1.6 To request compensation if they have suffered damage as a result of a breach of Regulation (EU) 2016/679.

5.1.7 To take action to remove, block, or delete data, including to exercise the right to be forgotten or to request the correction of inaccurate data.

5.1.8 To request the supervisory authority to assess whether any of the provisions of Regulation (EU) 2016/679 have been infringed.

5.1.9 To receive personal data in a structured, commonly used and machine-readable format or to request that the data be transferred to another controller.

5.1.10 To object to automated profiling that has been carried out without consent.

5.2 Aero Technic BG Ltd. guarantees that data subjects can exercise these rights:

5.2.1 Data subjects may make requests for access to their personal data, and Aero Technic BG Ltd. guarantees that the response to a request for access to data complies with the requirements of Regulation (EU) 2016/679.

5.2.2 Data subjects have the right to lodge complaints with Aero Technic BG Ltd. regarding the processing of their personal data.

6. Consent

6.1. For Aero Technic BG Ltd., "consent" means that it is explicitly and freely given, specific, informed, and expresses an unambiguous indication of the data subject's wishes. It is a statement by the data subject that signifies approval for the processing of personal data relating to him or her. The data subject may withdraw his or her consent at any time.

6.2 For Aero Technic BG Ltd., "consent" means that the data subject has been fully informed about the planned processing and has expressed their approval. Consent obtained on the basis of misleading information is not a valid basis for processing.

6.3 Where applicable, active communication between the parties shall be used to demonstrate active consent.

6.4 For the processing of sensitive data, explicit written consent should be obtained from data subjects, unless there is an alternative legitimate basis.

6.5 In most cases, consent for the processing of personal and sensitive data is routinely obtained by Aero Technic BG Ltd. using standard consent documents.

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6.6 When Aero Technic BG Ltd. provides online services to minors, permission must be obtained from their parents or guardians. This requirement applies to persons under the age of 18.

7. Data security

7.1 Employees are responsible for ensuring that all personal data that Aero Technic BG Ltd. possesses and for which they are responsible is stored securely and is not disclosed under any other circumstances, unless a third party has received special permission from Aero Technic BG Ltd. to receive information and has entered into a confidentiality agreement.

7.2 All personal data must be accessible only to those who need it, and access may be granted only in accordance with the access control policy. All personal data must be treated with the utmost security and must be stored:

- in lockable rooms with controlled access;
- in locked drawers or cabinets; and/or
- if computerized, password protected in accordance with corporate requirements in "9. Access Control Policy"; and/or
- stored on portable computer media that is encrypted.

7.3 Computer displays should only be visible to authorized employees of Aero Technic BG Ltd. All employees should be familiar with the clean desk and clean screen policy.

7.4 Paper-based information shall not be left where it may be accessible to unauthorized personnel and shall not be removed from the premises without express permission. As soon as paper-based information no longer requires daily processing, it shall be removed by means of reliable archiving.

7.5. Manual records that have reached their retention date must be shredded and destroyed as "confidential waste." Hard drives from redundant personal computers must be removed and destroyed immediately.

7.6 Processing personal data "from home" poses a potentially greater risk of loss, theft, or damage to personal data. Staff must have specific authorization to process data outside the company.

8. Disclosure of data

8.1 Aero Technic BG Ltd. must ensure that personal data is not disclosed to unauthorized third parties, including family members, friends, government authorities, and, in certain circumstances,

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the police. All employees must be cautious when asked to disclose personal data to a third party. It is important to consider whether or not the disclosure of information is related to the activities of Aero Technic BG Ltd.

8.2 All requests for data disclosure must be supported by appropriate documentation. The disclosure itself must be agreed with the Data Protection Officer.

9. Data retention and destruction

9.1 Aero Technic BG Ltd. does not store personal data in a form that allows the identification of data subjects for longer than is necessary in relation to the purposes for which the data was originally collected.

9.2 Aero Technic BG Ltd. may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest or for scientific, historical, scientific research, or statistical purposes, provided that appropriate technical and organizational measures are implemented to protect the rights and freedoms of the data subject.

9.3 The retention period for each category of personal data will be specified in "D. Archiving Procedure," along with the criteria used to determine that period, including any legal obligations on the basis of which Aero Technic BG Ltd. must retain the data.

9.4 Personal data must be destroyed reliably by being processed in an appropriate manner to maintain security and thus protect the "rights and freedoms" of data subjects.

10. Data transfer

10.1 Any transfer of data from the European Economic Area (EEA) to countries outside the European Economic Area, referred to in Regulation (EU) 2016/679 as "**third countries**," is unlawful unless there is an appropriate "level of protection of the fundamental rights of data subjects".

The transfer of personal data outside the EEA is prohibited unless one or more of the following safeguards or exceptions apply:

10.1.1 Adequacy decision. The European Commission may assess third countries, territories, and/or specific sectors in third countries to determine whether there is an adequate level of protection of the rights and freedoms of individuals. In such cases, no authorization is required.

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Countries that are members of the European Economic Area (EEA) but not of the EU are deemed to qualify for an adequacy decision.

A list of countries that currently meet the Commission's adequacy requirements is published in the Official Journal of the European Union.
https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en.

Adequacy assessment by the data controller

When conducting an adequacy assessment, the following factors should be taken into account:

- the nature of the information being transferred;
- the country or territory of origin and final destination of the information;
- how the information will be used and for how long;
- the laws and practices of the recipient country, including relevant codes of practice and international obligations.

10.1.2 Binding corporate rules that Aero Technic BG Ltd. may adopt for data transfers outside the EU, subject to approval by the relevant supervisory authority.

10.1.3 Model contractual clauses. Aero Technic BG Ltd. may adopt approved contractual clauses for data transfers outside the EEA.

10.1.4 Exceptions. In the absence of an adequacy decision, binding corporate rules, or contractual clauses, the transfer of personal data to a third country or international organization shall only take place under one of the following conditions:

- The data subject has expressly consented to the proposed transfer after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards;
- The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the request of the data subject;
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person;
- The transfer is necessary for important reasons of public interest;
- The transfer is necessary for the establishment, exercise, or defense of legal claims; and/or

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- The transfer is necessary to protect the vital interests of the data subject or other persons where the data subject is physically or legally incapable of giving consent.

11. Register of information assets, data inventory

11.1 Aero Technic BG Ltd. has implemented a process for inventorying data and data flows as part of its approach to addressing the potential risks associated with maintaining compliance with Regulation (EU) 2016/679.

The following are taken into account:

- business processes that use personal data;
- sources of personal data;
 - number of data subjects;
 - description of each element of personal data;
 - processing activities;
 - a list of the categories of personal data processed is maintained;
 - the purposes for which each category of personal data is used are documented;
 - recipients and potential recipients of personal data;
 - the role of Aero Technic BG Ltd. in the entire data flow;
 - key systems and storage facilities;
 - all data transfers; and
 - all retention and destruction requirements.

11.2 Aero Technic BG Ltd. is aware of all risks associated with the processing of certain types of personal data.

11.2.1 Aero Technic BG Ltd. assesses the level of risk to individuals associated with the processing of their personal data. Data protection impact assessments ("8. Impact Assessment Procedure") are carried out when personal data is processed by Aero Technic BG Ltd. and in connection with processing by other organizations on behalf of Aero Technic BG Ltd.

11.2.2 Aero Technic BG Ltd. manages all risks identified by the risk assessment in order to reduce the likelihood of non-compliance.

11.2.3 Where a type of processing using new technologies, taking into account the nature, scope, context, and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, Aero Technic BG Ltd. will, prior to commencing processing, carry out an assessment of the impact of the envisaged operations on the protection of personal data. The impact assessment may consider a set of similar processing operations that present similar high risks.

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11.2.4 Where the impact assessment reveals that the processing of personal data by Aero Technic BG Ltd. could cause damage to data subjects, the decision on whether Aero Technic BG Ltd. can continue or not should be escalated for review to the Data Protection Officer.

11.2.5 The Data Protection Officer shall escalate the matter to the supervisory authority if there are serious concerns about the potential harm or risk or the amount of data involved.

11.2.6 Appropriate controls may be selected from Annex A to ISO/IEC 27001, ISO/IEC 27701, ISO/IEC 27017, ISO/IEC 27018, etc., where appropriate, and shall be implemented to reduce the level of risk associated with the processing of personal data to an acceptable level.

Responsible for compliance with the rules set out in this document and approval:

The Data Protection Officer is responsible for this document, including ensuring that the policy is reviewed in accordance with the requirements set out above.

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

This policy has been approved by the Manager.

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