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APPROVED:



Georgi Kanchev
Manager

Personal Data Privacy Policy 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)
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(GDPR)

Introduction

Data protection principles should apply to any information relating to a natural person who is identified or identifiable.

In order to determine whether a natural person can be identified, all sources of information that the controller is most likely to use to identify that natural person directly or indirectly should be taken into account. In order to determine whether there is a sufficient likelihood that certain means will be used to identify the natural person, all objective factors should be taken into account, such as the costs and time required for identification, as well as the technologies available at the time of data processing.

1. General Data Protection Regulation (GDPR)

1.1 The General Data Protection Regulation of 2016 replaces the EU Data Protection Directive 95/46/EC of 1995 and the corresponding laws of individual Member States that were developed in accordance with its guidelines. The purpose of the Regulation is to protect the "rights and freedoms" of natural persons (living individuals) and to ensure that personal data is not processed without their knowledge and, where possible, that it is processed with their consent.

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1.2 Scope of the GDPR

1) Material scope (Article 2) - The GDPR applies both to the processing of personal data, wholly or partly by automated means (e.g. by computer), and to the non-automated processing of personal data (i.e. paper documents) that is part of a system or is intended to be part of a system.

2) Territorial scope (Article 3) - The GDPR applies to all controllers established in the EU (European Union) who process personal data of data subjects. It also applies to controllers outside the EU who process personal data to offer goods and services or monitor the behavior of data subjects residing in the EU.

1.3 Definitions

For the purposes of this Regulation (Article 4):

1) personal data means any information relating to a natural person who is identified or identifiable ("data subject"), directly or indirectly, (e.g. by means of an identifier such as a name, an identification number, location data, online identifier) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person, etc.;

2) processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consulting, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

3) restriction of processing means marking stored personal data with the aim of limiting their processing in the future;

4) profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, their economic situation, health, personal preferences, interests, reliability, behavior, location, or movement;

5) pseudonymization means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that it is stored separately and is subject to technical and organizational measures to ensure that the personal data is not linked to an identified or identifiable natural person;

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6) personal data file means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or distributed in a functional or geographical manner;

7) controller means a natural or legal person, public authority, agency, or 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

8) processor means a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller;

9) recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union law shall not be regarded as recipients. The processing of those data by those public authorities shall comply with the applicable data protection rules according to the purposes of the processing;

10) third party means a natural or legal person, public authority, agency, or other body, other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

11) consent of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

12) personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

13) genetic data means personal data related to the inherited or acquired genetic characteristics of a natural person, which give unique information about the characteristics or health of that natural person and which are obtained, in particular, from the analysis of a biological sample from that natural person;

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14) biometric data means personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

15) health data means personal data related to the physical or mental health of a natural person, including the provision of health services, which reveal information about his or her health status;

16) representative means a natural or legal person established in the Union who, appointed by the controller or processor in writing pursuant to Article 27 of the GDPR, represents the controller or processor in relation to their respective obligations under the GDPR;

17) company means a natural or legal person engaged in economic activity, regardless of its legal form, including partnerships or associations regularly engaged in economic activity;

18) group of undertakings means a controlling undertaking and the undertakings controlled by it;

19) binding corporate rules means personal data protection policies that are complied with by a controller or processor established in the territory of a Member State, when personal data are transferred or a set of transfers of personal data are made to a controller or processor in one or more third countries within a group of undertakings or a group of enterprises engaged in a joint economic activity;

20) supervisory authority means an independent public authority established by a Member State. In Bulgaria, the supervisory authority is **the Commission for Personal Data Protection**.

21) "supervisory authority concerned" means a supervisory authority which is concerned by the processing of personal data because:

- a) the controller or processor is established in the territory of the Member State of that supervisory authority;
- (b) data subjects residing in the Member State of that supervisory authority are substantially affected or are likely to be substantially affected by the processing;
- (c) a complaint has been lodged with that supervisory authority;

(22) cross-border processing means either:

- (a) the processing of personal data carried out in the context of the activities of establishments in more than one Member State of a controller or processor in the Union, where the controller or processor is established in more than one Member State;

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(b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union, but which substantially affects or is likely to substantially affect data subjects in more than one Member State;

(23) 'relevant and reasoned objection' means an objection to a draft decision on whether there has been an infringement of this Regulation, or whether the envisaged action in relation to the controller or processor meets the requirements of this Regulation, which clearly demonstrates that the draft decision poses substantial risks to the fundamental rights and freedoms of data subjects and, where applicable, to the free movement of personal data within the Union;

(24) 'information society service' means a service within the meaning of point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council;

(25) 'international organisation' means an organisation and its subordinate bodies governed by public international law, or another body which is set up by, or on the basis of, an agreement between two or more countries.

2. Policy statement

2.1 The management of Aero Technic BG Ltd. is committed to complying with the relevant EU and Member State laws regarding personal data and the protection of the "rights and freedoms" of individuals whose information Aero Technic BG Ltd. collects and processes in accordance with the GDPR.

2.2 Compliance with the GDPR is described by this policy and other related policies, such as the information security policy, together with the related processes and procedures.

2.3 The GDPR and this policy apply to all functions of Aero Technic BG Ltd. for the processing of personal data, including those that process the personal data of customers, employees, suppliers, partners, and others that the organization processes from various sources.

2.4 Aero Technic BG Ltd. has established data protection and privacy objectives that are incorporated into the Personal Information Management System (PIMS).

2.5 The Data Protection Officer is responsible for reviewing the register of activities under Article 30 annually in light of any changes in the activities of Aero Technic BG Ltd., as well as any additional requirements determined by data from a data protection impact assessment. This register must be made available to the supervisory authority upon request.

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2.6 This policy applies to all employees and stakeholders of Aero Technic BG Ltd., such as suppliers or external subcontractors. Any violation of the ORZ or PIMS will be dealt with in accordance with the disciplinary practices of Aero Technic BG Ltd. and may also constitute a criminal offense, which will be reported to the relevant authorities.

2.7 Partners and third parties who work with or for Aero Technic BG Ltd. and who have or may have access to personal data are expected to have read, understood, and comply with this policy. No third party may have access to personal data stored by Aero Technic BG Ltd. without first entering into a data confidentiality agreement that imposes obligations on the third party that are no less than those applied by Aero Technic BG Ltd. Aero Technic BG Ltd. has the right to periodically audit compliance with the agreement.

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

This policy has been approved by the Manager.

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