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APPROVED:



Georgi Kanchev
Manager

**Privacy and personal data protection policy
 of customers and suppliers (contractors) of Aero Technic BG Ltd.
 and their representatives, employees, and/or subcontractors
 ("Privacy Policy")**

Aero Technic BG Ltd. ("we") respects the privacy of individuals, representatives, employees, and/or subcontractors of its counterparties and guarantees the maximum protection of their personal data processed in connection with the contractual relationships of Aero Technic BG Ltd. with individuals and legal entities. For brevity, these individuals and legal entities will be referred to below as "Counterparty" or "Counterparties."

This privacy policy applies to Counterparties who are natural persons (customers, landlords, consultants, and others) and to natural persons who are representatives, employees, and/or subcontractors of Counterparties who are legal entities, as well as to representatives and employees of the subcontractors of Counterparties.

This Privacy Policy is based on the requirements of Article 14 and others of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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").

Processing of personal data ("processing") means any operation or set of operations which may be performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consulting, use, disclosure or transmission, dissemination, provision, updating or combining, blocking, erasure or destruction of data.

Aero Technic BG Ltd. may make changes and additions to this policy. All changes and additions to the Privacy Policy will be applied after publication of its current content, available through our website: www.aerotechnic-bg.com

The Privacy Policy applies to your personal data if you are a natural person who performs one or more of the following functions in or for a Counterparty of Aero Technic BG Ltd:

- Counterparty – natural person;

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- Legal representative;
- Proxy;
- Contact person;
- Person who accesses the premises of Aero Technic BG Ltd.;
- Person involved in the creation and exchange of documents for the assignment, acceptance, and invoicing of goods/services;
- Other persons who perform one or more of the above functions in or for a subcontractor of a Counterparty of Aero Technic BG Ltd., performing actions on behalf of the Counterparty in the performance of a contract with Aero Technic BG Ltd., including the Counterparty's own subcontractors.

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. Vrazdebna, Sofia Airport, 8, Hangar "Heli Air".
- 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@aerotechnic-bg.com ; tel. + 359 888 488 101

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

2.1. Depending on the specific purposes and grounds, Aero Technic BG Ltd. processes the following categories of data independently or in combination with each other:

- Data obtained in your capacity as a Counterparty, representative and/or employee or subcontractor of a Counterparty and/or representatives and employees of its subcontractor in connection with the contractual relationship with Aero Technic BG Ltd:
 - full name, personal identification number or foreigner's personal number, profession, address, telephone number and/or email address, as well as other contact details;
 - number, date of issue, validity, and issuer of identity document;
 - data collected during payments made by or to Aero Technic BG Ltd.
- Data prepared and generated by Aero Technic BG Ltd. in the course of the contractual relationship between Aero Technic BG Ltd. and the Counterparty:
 - video recording during a visit to the premises of Aero Technic BG Ltd., prepared with video surveillance equipment for security purposes;
 - information about the type and content of the contractual relationship, as well as any other information related to the contractual relationship, including e-mail, letters, information about your requests, troubleshooting, complaints, petitions, grievances, and other feedback we receive from you.

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3. Purposes of personal data processing:

Aero Technic BG Ltd. processes your data for the following purposes:

- To identify you as a representative, employee, and/or (representative, employee of) subcontractor of the Counterparty in: concluding, performing, amending, and terminating a contract between Aero Technic BG Ltd. and the Counterparty, including establishing the existence and scope of the representative authority granted to you;
- Performing activities related to the operational activities for the performance of the contract – assigning, accepting, reporting, preparing documents, making payments, etc.;
- Providing access to office, technological, and commercial premises for the performance of the subject matter of the contract;
- Communicating by telephone, fax, email, and other means in connection with activities under the contract;
- Keeping accounting records in connection with the performance of the contract;
- Fulfilling other legal obligations of Aero Technic BG Ltd.

4. Third parties who receive access to and process your personal data:

4.1. 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. or have direct/indirect access to your personal data:

- Persons who, on behalf of Aero Technic BG Ltd., maintain equipment and software used to process your personal data;
- Security companies licensed to perform private security activities, processing video recordings from Aero Technic BG Ltd. facilities and/or maintaining other records in the process of ensuring access control at the same facilities;
- Persons providing consulting services in various fields.

4.2. Other personal data administrators to whom Aero Technic BG Ltd. provides your personal data, processing your data on their own behalf and in their own name:

- Banks servicing payments made by you;
- Transport/courier companies, if the use of such companies is necessary for the operational performance of the contractual relations;
- Competent authorities which, by virtue of a normative act, have the power to receive (access) financial and related documents;
- Competent authorities that, by virtue of a normative act, have the power to require 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 – Consumer Protection Commission, authorities with powers to protect national security and public order;

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5. Transfer of your personal data to a third country or international organization:

- Aero Technic BG Ltd. will not transfer your personal data to a third country and/or international organization outside the EU and/or for which there is no Commission decision on the existence of an adequate level of data protection, without providing appropriate safeguards, applicable rights for you, and effective legal remedies.
- As the addressee of this Privacy Policy, you have the right to object to the unlawful transfer of your personal data if it is established that Aero Technic BG Ltd. is in breach of this point.

6. How long your personal data is stored:

The length of time your personal data is stored depends on the purposes for which it was collected:

- Personal data processed for the purpose of concluding and performing a contract between Aero Technic BG Ltd. and the Counterparty shall be stored for the duration of the contract and/or until all financial relations or any claims/objections between the parties are finally settled;
- Personal data processed for the purpose of issuing accounting/financial documents for tax and social security control, such as (but not limited to) invoices, debit and credit notes, acceptance and transfer protocols, contracts, and others, shall be stored for at least 5 years after the expiry of the limitation period for the repayment of the public claim, unless the applicable legislation provides for a longer period;
- Images (video recordings) or data for access to the premises of Aero Technic BG Ltd. – up to 60 days from the 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, the video recordings may be stored for a longer period.

7. What are your rights in relation to the processing of personal data by Aero Technic BG Ltd. and what actions should you take to exercise them.

As the addressee of this Privacy Policy, you have the following rights with regard to your personal data processed by Aero Technic BG Ltd:

- 7.1. to access your personal data and information of the type we have 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;
- 7.1.1. access to personal data contained in video recordings:
 - 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;

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- 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.
- 7.2. request that your personal data be corrected when it is inaccurate or needs to be supplemented for the purposes of processing;
- 7.3. request the erasure of your personal data, 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;
- 7.4. request that the processing of your personal data be restricted in any of the following cases:
- when the accuracy of your personal data is contested - for the period necessary for Aero Technic BG Ltd. to verify the accuracy of the data;
 - 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;
- 7.5. to object to Aero Technic BG Ltd. at any time and for your personal reasons in view of the specific situation, against the processing of personal data relating to you, which is based on the need to perform a task in the public interest or in the exercise of official powers vested in us, or for which we have indicated that we process for our legitimate interest;
- Aero Technic BG Ltd. will respond to you within a reasonable time, but no longer than one month, whether it finds the same to be justified and, accordingly, whether it will terminate the processing of the relevant personal data for these purposes.
- 7.6. to withdraw your consent to the processing of your personal data at any time, where the processing is based on your consent;
- 7.7. to request information about the source of your personal data and, if applicable, whether the data is from a publicly available source;
- 7.8. to lodge a complaint with the Personal Data Protection Commission if you believe that your rights in relation to the processing of your personal data have been violated.

To exercise your rights as described above, simply submit your request in writing and send it to the address or email address above. The request should contain sufficient information to identify you beyond doubt, as well as contact details for feedback – address and/or email

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address. When exercising the right of access to personal data, Aero Technic BG Ltd. will request that the request and/or receipt of the data be made in person by you or by a person authorized by a notarized power of attorney in order to prevent unauthorized access to your personal data.

When exercising your rights, Aero Technic BG Ltd. will review the request in a timely manner and respond to you within the statutory time limit.

This policy was last updated on August 8, 2025.

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