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APPROVED:



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Georgi Kanchev
Manager

**Privacy and personal data protection policy
of employees and staff at Aero Technic Ltd. and persons hired for temporary work
under Chapter Five, Section VIII "c" of the Labor Code
("Privacy Policy")**

Aero Technic Ltd. ("the employer") respects the privacy of its employees. Aero Technic Ltd. guarantees the maximum protection of their personal data processed in connection with the exercise of the rights and obligations of the parties under the employment contracts.

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 individuals 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 only after the current content has been published on the internal intranet portal.

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 administrator 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 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@aerotechnic-bg.com ; tel. + 359 888488101

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

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2.1. In compliance with its legal obligations, Aero Technic Ltd. processes your personal data:

2.1.1. For the purpose of the lawful establishment of the employment relationship (conclusion of the employment contract), as follows:

- full name, personal identification number or foreigner's personal number, or service number issued by the National Revenue Agency, permanent address, temporary address and address for correspondence with the National Social Security Institute, telephone and/or email for contact with you;
- information about your age;
- information about your employment and insurance history and professional experience prior to the conclusion of the employment contract;
- information about your education, specialty, qualification, legal capacity, academic title, or academic degree;
- information about your professional experience in your specialty;
- information about your health status, certified in a medical examination document upon initial employment, when changing to another job with the same employer that is associated with harmful factors and the risk of occupational injuries, upon starting work in the industries and professions listed in the List of Industries and Professions for which preliminary and periodic preventive medical examinations of workers exposed to hazards are mandatory under Ordinance No. 3 of February 28, 1987; for mandatory preliminary and periodic medical examinations of workers and after cessation of employment under an employment relationship for a period exceeding 3 months;
- information about your criminal record, certified by a criminal record certificate and/or an official note from the National Investigation Service regarding the existence or absence of pre-trial proceedings, when occupying material and accounting positions;
- information about your mental health when applying for a position that requires such a certificate;
- information from your driver's license and its control card - number, date of issue, and date of validity when applying for a position that requires such a license;
- data updating your personal data already provided.

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2.1.2. For the purpose of performing the employment contract, as follows:

- your bank account and other banking and payment information collected and processed in connection with the bank transfer of the agreed remuneration under the employment contract;
- data on your accumulated employment and/or insurance experience and professional experience during the term of the employment relationship;
- data necessary for granting the relevant type of leave provided for in the Labor Code/Collective Labor Agreement, namely:
 - data on your health, that of your child or parent;
 - when taking leave for temporary incapacity for work and leave in the event of the death or serious illness of a parent;
 - information about your family status - when taking leave for marriage;
 - information about blood donation - when taking leave for blood donation;
 - information from death certificates of a parent, child, spouse, brother, sister, and parent of the other spouse or other direct relatives - when taking leave due to the death of one of the aforementioned relatives;
 - information about participation in legal proceedings as a party, witness, or expert witness
 - when taking leave to participate in the court hearing;
 - data on participation in meetings as a member of a representative state body or lay judge - when taking leave for the duration of participation in the meetings;
 - data on participation in meetings of a special negotiating body, European Works Council or representative body in a European commercial or cooperative company - when taking leave for the duration of participation in these meetings;
 - data on participation in training and activities of voluntary disaster protection formations - when taking leave for the duration of such training/activities in the event of disasters;
 - data on in vitro treatment - when taking leave for medical examinations during working hours;
 - data on active service in the voluntary reserve - when taking leave for the duration of the service;
 - data on pregnancy, born and adopted children
 - when taking leave for pregnancy and childbirth, for raising a child, for adoption, as well as when taking additional leave for two or more living children;

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- data on training conducted in educational institutions - in secondary or higher education without interruption from work or in evening educational institutions, when applying to secondary and/or higher education institutions, as well as for the preparation of a dissertation for obtaining a doctoral degree; data on taking a matriculation or state exam, including preparation and defense of a thesis, diploma project, or dissertation;
- data on your health status, as reflected in the TELK/NELK decision or other document issued by the relevant health authorities, necessary for your employment and payment of the corresponding compensation for this, for the preparation of a conclusion determining the suitability of the worker and employee to perform a certain type of work based on the working conditions and the mandatory medical examination, for the investigation of accidents at work;
- data necessary for your identification in connection with the organisation and conduct of mandatory preventive medical examinations of workers and employees
- data for acquiring professional qualifications, improving professional qualifications, or retraining;
- data on training conducted - internal or by external providers at the employer's expense;
- data on training and/or instruction conducted on healthy and safe working conditions, electrical safety, and first aid, in accordance with the requirements of the Labor Code and the Law on Healthy and Safe Working Conditions;
- data on your suitability to perform a certain type of work from the conclusion of the occupational health service, in accordance with the requirements of Ordinance No. 3 of 25.01.2008 on the conditions and procedure for the implementation of the activities of occupational health services;
- information about your participation as a member of the Committee on Healthy and Safe Working Conditions and/or the Employment Commission;
- information about your participation in general meetings of workers and employees or general meetings of proxies and/or consultations with them, in the cases provided for in the Labor Code;
- data on the performance of work duties at a place of work other than the agreed one (business trips) and the payment of the relevant compensation for this;

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- all data contained in your employment contract, in the additional agreements for its amendment and in the orders for its termination for the purpose of fulfilling the obligation to keep and store an employment file for each worker or employee, effective from the signing of the employment contract;
- the amounts of remuneration under the employment contract, the amounts of deductions and the grounds for them, the amounts of taxes and social security contributions due/paid for the period of validity of the contract or in connection with its termination, for the purpose of keeping and storing payroll records;
- the amounts of deductions for supplementary pension insurance;

2.1.3. For the purpose of lawful termination of the employment relationship (employment contract), as follows:

- information about your health;
- data on your employment;
- data on pregnancy, born and adopted children and their age;
- information about in vitro treatment;
- data on the election of representatives of workers and employees for the period during which they hold this position;
- data on membership in a special negotiating body, a European Works Council, or a representative body in a European commercial or cooperative company for the duration of these functions;
- data on completed insurance periods and age for retirement or granting of a reduced pension;
- data on entry into public service;
- data on taking up paid elective work or scientific work on a competitive basis;
- data on continuing your education in a full-time educational institution or on entering a full-time doctoral program;
- data on your employer and the term of your employment contract, in cases where you are employed by Aero Technic Ltd. on a fixed-term employment contract;
- information about your reinstatement at work, according to a court decision;
- information about your qualities for the effective performance of the work assigned to you;
- information about your education or professional qualifications for the work performed;
- information about your conviction with a final judgment;
- information about violations of labor discipline committed by you;

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- information about compensation accrued/paid in connection with the termination of the employment contract.

2.1.4. For the purpose of fulfilling legal obligations under the Road Traffic Act and its subordinate legislation, as follows:

- data contained in a motor vehicle driving license and inspection certificate;
- data on violations of the Road Traffic Act and its subordinate legislation.

2.2. On the basis of the contractual relationship between you and Aero Technic Ltd., Aero Technic Ltd. processes your personal data for the purposes of performing the contract and monitoring compliance with the applicable internal labor regulations, as follows:

- data for assessing your individual performance in the performance of your job duties and your individual goals in accordance with the systems and procedures for goal setting and performance assessment applicable to you;
- a unique personal number (UPN) created by the employer for internal identification without using any other personal data;

2.3. Aero Technic Ltd. processes your data on the basis of its legitimate interest, as follows:

- personal email, telephone number, contact address for you and your relatives for the purpose of contacting you or a person specified by you in case of crises, disasters, accidents, incidents at the workplace, as well as for the exchange of documents upon leaving or during extended leave;
- Your photographs - for the purposes of access control to the premises and facilities of Aero Technic Ltd., for maintaining a business directory for contacting you and for personalizing your account on the mail server of Aero Technic Ltd.;
- data provided when signing and agreeing to the Code of Ethics for employees of Aero Technic Ltd.;
- data provided for the purpose of making deductions from your salary;
- video recordings of your images:
 - in the technological premises for the purpose of compliance with and control of technological and labor discipline in production, where deviation from established procedures poses serious threats to the life and health of employees;
 - in the central office, warehouses, buildings with other equipment, and other business premises of Aero Technic Ltd., made with video surveillance equipment for security purposes - to ensure

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the security of the property of Aero Technic Ltd., to ensure the undisturbed performance of your job duties, in order to monitor compliance with work discipline and the performance of your job duties under your employment contract, respectively in the Internal Labor Regulations, orders, instructions, etc.;

- video recordings of your images during training aimed at improving your professional qualifications and/or improving your knowledge and skills directly related to the performance of your job duties, in order to analyze your performance during training and receive feedback. The video recordings are not stored after the analysis and preparation of the feedback;
 - data on the location of company cars used by you - data generated by GPS (global positioning system) devices installed on company cars provided to you for the performance of your job duties and which transmit real-time data on location, speed, and mileage. The employer collects this data for the purposes of managing the vehicle fleet of Aero Technic Ltd., vehicle accounting, including for tax purposes, compliance with the work obligations of workers and employees, including accounting obligations in relation to the company cars themselves, as well as for providing them to persons providing fleet management services, to authorities enforcing traffic regulations, to insurers under a comprehensive insurance contract for a company car at their request, including in the event of your involvement in a traffic accident and if it is necessary to file a claim.
 - the content of your incoming and outgoing business and/or personal email or other electronic spaces for storing and exchanging data that are not business-related but are used by you from business IP addresses and/or business devices entrusted to you, as well as work IP addresses when visiting websites, systems and registers of third parties for the purpose of monitoring the performance of your work duties related to the handling of confidential employer information in accordance with the Internal Labor Regulations and employer orders for the prevention of information abuse and the use of work-provided devices;
- 2.4. With your explicit written (including electronic) consent, Aero Technic Ltd. processes the data listed below for the following purposes:
- Your personal data under life insurance contracts, supplementary pension insurance contracts, and loan agreements with banks for the purpose of administering and making payments under the contracts on your behalf and for your account - by transfer from your salary;

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

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3.1. Third parties to whom we provide your data in compliance with our legal obligations, namely:

- The Labor Inspectorate (IT) (Executive Agency "General Labor Inspectorate" and the territorial divisions of the "Labor Inspectorate" directorates)
- in fulfillment of our obligation to assist in the exercise of control powers regarding compliance with labor legislation, we may provide:
 - any information relating to your employment contract, including personal data;
 - National Revenue Agency (NRA)
- in fulfillment of our obligation to send notifications upon the conclusion, amendment, and termination of an employment contract, we provide:
 - your full name, personal identification number, and position;
 - agreed remuneration;
- in compliance with our obligation to withhold and pay taxes and in the exercise of tax and social security control, we provide:
 - the amount of your remuneration and the amount of tax paid;
 - any information relating to your employment contract, including personal data;
 - National Social Security Institute (NSSI)
- in fulfillment of our obligation to notify the NSSI of occupational accidents, we may provide:
 - your full name, personal identification number, position, address, contact telephone number, and email address;
 - information about the injury (your health condition);
 - details of your location on the day and at the time of the accident;
 - information from the investigation of the accident at work, which may also include other personal data;
- in fulfillment of our obligation to notify the National Social Security Institute (NSSI) of requests for paid leave at the expense of social security, we may provide:
 - your full name, personal identification number, position, address, contact telephone number, personal bank account;
 - information about your health;
 - information about in vitro treatment;
 - information about your pregnancy, your biological and adopted children and their ages;
 - information about your insurance period, amounts and types of insurance contributions;
 - information about days of absence and the reasons for them.

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- In fulfillment of our obligation to assist the National Social Security Institute (NOI) in monitoring compliance with social security legislation, we provide:
 - any information relating to your employment contract, including personal data;
 - data concerning paid remuneration, social security contributions paid - amounts, type.
- Competent authorities, such as a Bulgarian court or a court in another country, various supervisory/regulatory authorities - the Labor Inspectorate, the Commission for Protection against Discrimination, the Consumer Protection Commission, authorities with powers under to protect national security and public order, public and private bailiffs;
- in fulfillment of our obligation to assist in the exercise of their control/authority powers, we may provide any available information relating to your employment contract, including personal data;
- Occupational health services (OHS)
 - in fulfillment of our obligation to provide services to our workers and employees by an OHS registered under Article 25c of the Health and Safety at Work Act and to provide assistance in the performance of its functions, we may provide:
 - full name, personal identification number, position held, permanent and current address, contact telephone number, health status, employment data, occupational disease;
 - data on occupational accidents suffered - data on the injury (health status), the circumstances in which it was suffered, and other relevant information;
- Insurance companies with which we have concluded Work Accident insurance policies. In fulfillment of our obligation to insure the relevant categories of employees for the risk of "Work Accident," we provide:
 - full name, personal identification number, position held, health status, employment data, data on the occupational accident suffered - data on the injury (health status), the circumstances in which it occurred, and other relevant information required by the insurer in the event of an insurance claim;
- Territorial structures of the Ministry of the Interior
 - In compliance with our obligation under the Traffic Organization Regulation and the Road Traffic Act and its subordinate legislation to submit a written declaration in the prescribed form with details of the person declaring the circumstances and with

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details of the person who committed the violation, and a copy of their motor vehicle driving licence, we submit:

- Data required in accordance with the standard declaration form.
 - Registered auditors within the meaning of Article 7 of the Independent Financial Audit Act - We submit all available financial, accounting, and other information, including your personal data, to certify with reasonable assurance that the financial statements of Aero Technic Ltd. do not contain material misstatements, deviations, and inconsistencies due to errors or fraud, and whether the financial report is presented reliably, in all material aspects, whether it gives a true and fair view of the financial position, results of operations, and cash flows of Aero Technic Ltd. as of the date of the financial report, in accordance with the applicable accounting basis.

3.2. Third parties, counterparties/customers of Aero Technic Ltd., competent authorities, etc., to whom we provide your data, as follows:

- Data specified in powers of attorney and/or contracts with customers/counterparties, giving you the right to perform actions on behalf of and for the account of Aero Technic Ltd. in the performance of your job duties, namely: full name, personal identification number, data from an identity document, position held, work telephone number and/or email address;
- Data specified in invoices, protocols, and/or other documents exchanged with customers/contractors in connection with actions performed by you on behalf of and for the account of Aero Technic Ltd. in the performance of your job duties, namely: full name, work phone number and/or email address;
- Data required by customers or suppliers to provide access to their premises for the purpose of installing/repairing faults and/or performing other activities related to the provision and maintenance or installation and maintenance of equipment, namely: full name, personal identification number, ELN, data from identity document, position held;
- Data required by managing authorities or other organizational structures with powers to implement operational programs, spend funds from European funds or other funds, and provide financial assistance for which Aero Technic Ltd. is an applicant and/or beneficiary, for example: full name, personal identification number, permanent address, citizenship, identity document details, etc.;
- Data required by contracting authorities in tender procedures under the Public Procurement Act, respectively part of the tender documentation,

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namely: full name, personal identification number, position held, professional experience, work experience, data on qualifications, training completed, educational degree;

- Data required by competent authorities, including authorities within the structure of the Ministry of the Interior, for the purpose of protecting the public interest and national security during the state of emergency declared by Decision of the National Assembly of the Republic of Bulgaria on March 13, 2020, in the performance of your job duties.

3.3. Third parties (processors) to whom we provide your data on the basis of a contract with Aero Technic Ltd. and who process your personal data on behalf of Aero Technic Ltd. or have direct/indirect access to your personal data, namely:

- Persons who, on behalf of Aero Technic Ltd., maintain equipment and software used to process your personal data provided in connection with the conclusion of the employment contract and generated during its performance, including but not limited to: your employment contract data, including salary, taxes, absences, health data, family status data and data on your family members, insurance, personal deductions, bank accounts, training courses of any kind, performance evaluations, etc.;
- Persons who, on behalf of Aero Technic Ltd., manufacture work clothing/uniforms and/or protective equipment, we provide data on your height, chest circumference, and other measurements;
- Persons who, on behalf of Aero Technic Ltd., deliver valuable shipments and to whom we provide your full name, personal identification number, and personal card number, which are necessary for your unambiguous identification upon receipt of the shipment;
- Persons who, on behalf of Aero Technic Ltd., organize and conduct training courses, process your data - full name, position, work email address, place of work, ELN, and for training courses conducted in accordance with regulatory requirements, they also process your personal identification number and length of service;
- The security company, licensed to perform private security activities, processing video recordings and/or maintaining other records in the process of ensuring access control and security of property at Aero Technic Ltd. sites - full name, personal identification number, video recordings of your images;
- Persons providing services for the organization, storage, indexing, and destruction of archives on paper and/or electronic media - data of any nature for the purpose of organizing, documenting, and tracking the performance of assigned activities;

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- Persons providing consulting services in the field of labor law, public procurement law, and operational programs for financial assistance with funds from European funds or other funds - data under the employment contract.
 - Persons on whose behalf and/or for whose account Aero Technic Ltd. performs certain services, for the purpose of maintaining up-to-date information on the specific individuals who sign documents on behalf of these persons and/or have access to the systems of these third parties - full name, ELN, position, contact details;
 - Persons providing meal vouchers process your personal data for the purpose of distributing them on site and transferring them with acceptance and transfer protocols to end users - full name, ELN, Employer, General Directorate, Directorate, Division, Department, Unit, Position, as well as the contact telephone number of the employee or staff member who is responsible for delivering the vouchers;
- 3.4. Other personal data administrators to whom Aero Technic Ltd. provides your personal data, processing your personal data on their own behalf and in their own name, namely:
- Insurer - party to a contract with Aero Technic Ltd. for comprehensive insurance of company cars - in case you are involved in a traffic accident and it is necessary to file a claim - full name, personal identification number, company car details, copy of driver's license and inspection certificate;
 - Leasing companies - party to a contract with Aero Technic Ltd. for the provision of company cars to the employer on lease terms - for the purpose of issuing a notarized power of attorney entitling you to drive the company car if you are traveling abroad - personal ID card details, full name, personal identification number, and details from your driver's license as required by the notary;
 - Territorial Expert Medical Commission (TELK) / National Expert Medical Commission (NELK) - when exercising our rights to appeal against employment acts and other data necessary for consultations with a view to determining suitable work for an employed worker or employee;
 - Banks that, on behalf of Aero Technic Ltd., handle the payment of remuneration and personal deductions under the employment contract in the agreed amount - full name, personal identification number, amount of remuneration, bank account, insurance policy.

4. How long your personal data is stored

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The duration of storage of your personal data depends on the purposes of processing for which it was collected:

- Personal data processed for the purpose of concluding, performing, and terminating the employment contract is stored for the duration of the contract and up to 5 years after its termination or until all financial and other claims between the parties related to the performance/termination of the employment contract are finally settled;
- Personal data from driving licenses is stored for up to 4.5 years from the termination of the employment contract;
- Personal data in documents created in accordance with the Health and Safety at Work Act shall be stored for up to 5 years from their creation;
- Payroll records, together with all documents certifying insurance period and income - employment contract, requests and orders for leave taken that are not counted as insurance period, request for termination of employment contract, orders for termination of employment contracts shall be kept for 50 years from January 1 of the reporting period following the reporting period to which they relate;
- Declarations of occupational accidents and accompanying documents are kept for a period of 5 years from the date of the accident;
- Personal data processed for the purpose of issuing accounting/financial and other documents for the implementation of tax and social security control, such as, but not limited to, payment orders, debit and credit notes, acceptance and transfer protocols, declarations, 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;
- Video recordings - up to 60 days from the creation of the recording;
- In the event of an incident, theft, or violation of the integrity of the employees or property of Aero Technic Ltd., as well as for the purpose of preserving evidence in connection with the initiation or initiation of civil, administrative, or criminal proceedings and their provision to the competent authorities, video recordings may be stored for a longer period.
- Data processed for other purposes shall be stored for the period specified in a normative act, and in the absence of such, for a period until the purposes for which the data is processed are achieved and provided that there are no grounds for further processing.

5. What are your rights in relation to the processing of personal data by Aero Technic Ltd.

As an employee or worker, you have the following rights with regard to your personal data:

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5.1. 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 Ltd. about whether and for what purposes we process your personal data;

5.2. access to personal data contained in video recordings:

- if the storage period of the video recording has expired, Aero Technic Ltd. will provide you with information that the data is not being processed;
- if the video recording contains not only your data but also 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. request that your personal data be corrected when it is inaccurate or should be supplemented for the purposes of processing;

5.4. to request the deletion of your personal data, only in any of the following cases:

- they are no longer necessary for the purposes for which they are processed;
- you have withdrawn your consent/objected to their processing and there is no other basis for their processing;
- the processing of the data has been found to be unlawful;
- national or European legislation requires this;

5.5. to 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 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 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;

5.6. to request the transfer of your personal data concerning you and which you have provided to us, including receiving it from Aero Technic Ltd. in a structured, commonly used and machine-readable format or transferring it to another personal data controller. Your right to portability applies to personal data for which the following conditions are met:

Privacy and personal data protection policy
of workers and employees at Aero Technic Ltd. and persons hired for temporary work under
Chapter Five, Section VIII "c" of the Labor Code

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a) the processing of the data is based on your explicit consent or a contractual obligation; and

b) the processing is carried out by automated means.

5.7. to object to Aero Technic Ltd. at any time and for your own personal reasons, in view of the specific situation, against the processing of personal data relating to you, which we have indicated that we process for our legitimate interest in this Privacy Policy.

Upon receipt of an objection to the processing of your personal data, Aero Technic 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 those purposes.

5.8. to withdraw your consent to the processing of your personal data when the processing is based on your consent.

5.9. 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.

6. How can you exercise your rights under the previous point? To exercise your rights related to the processing of your personal data by your employer, it is sufficient to submit your request in writing and send it to the address or email address specified in this Privacy Policy.

Your request should contain sufficient information to enable you to be identified beyond doubt and contact details for feedback.

The employer will review your request in a timely manner and respond to you.

Depending on the request and in order to fulfill the employer's obligations to protect your personal data from unauthorized disclosure, Aero Technic Ltd. has the right to request personal delivery of the written response or to specify another method of delivery that ensures the security of the information contained therein.

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

Under current labor law, Aero Technic Ltd. is required to process data for the lawful conclusion, amendment, performance, and termination of your employment contract.

The processing of your data under item 1.1 is a mandatory prerequisite for concluding an employment contract with you. Accordingly, the consequences of not providing this data would be the inability to conclude an employment contract and, respectively, to perform it.

This Privacy Policy was last updated on August 8, 2025.

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