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APPROVED:



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Georgi Kanchev
 Manager

Privacy and personal data protection policy
for job applicants at Aero Technic BG Ltd.
("Privacy Policy")

Aero Technic BG Ltd. ("we") respects the privacy of individuals who are job applicants and guarantees the maximum protection of their personal data processed in connection with the selection process and pre-contractual relations between Aero Technic BG Ltd. and individuals. For brevity, these individuals will be referred to below as "Job Applicants."

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 27 April 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 combination, 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 the publication of its current content, available through our website: www.aerotechnic-bg.com

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, Hangar "Heli Air".

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- 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. + 359888488101

The "Job Applicants" category includes the following types of data subjects:

- **Applicants** (including potential, recommended, or external applicants wishing to apply for a job advertisement published by Aero Technic BG Ltd. - for convenience, all these categories are referred to as "Applicants" in this Policy)
- **Ready for appointment** (Candidates who will receive a job offer from Aero Technic BG Ltd.)
- **Approved for appointment** (Candidates who have signed a job offer from Aero Technic BG Ltd.)

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:

2.1.1. Potential candidates

- Your identity (e.g., full name, etc.)
- Your contact details (e.g., personal email address, phone number, etc.)
- Data about your professional life (e.g., CV, previous experience, etc.)
- Your personal data may have been indirectly collected by Aero Technic BG Ltd. in one of the following ways: LinkedIn profile, application through an external recruitment agency, networking event, university career forum, recommendations, through the Labor Office, or through a previous job application.

2.1.2. Recommended candidates

- Your identity (e.g., full name, etc.)
- Your contact details (e.g., personal email address, phone number, etc.)
- Details of your professional life (e.g., CV, previous experience, etc.)
- Your personal data may have been indirectly collected by Aero Technic BG Ltd. through the referral process, i.e., an employee of Aero Technic BG Ltd. may have recommended you for an open position in the company.

2.1.3. Ready for appointment (Candidates who will receive a job offer from Aero Technic BG Ltd.)

- Your identity (e.g., full name, etc.)
- Your contact details (e.g., personal email address, phone number, etc.)
- Information related to the job offer, necessary for preparing the official offer

2.1.4. Approved for appointment (Candidates who have signed a job offer from Aero Technic BG Ltd.):

- Once your application has been selected, you will be asked to provide additional information.
 - Your identity (e.g., full name, gender, etc.)

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- Information necessary for the successful completion of the recruitment and onboarding process for new employees (e.g., date and place of birth, marital status, most recent degree obtained, national identity document, including personal identification number (required for preparing pay slips and complying with the legal obligations of Aero Technic BG Ltd.), work permit, financial information for salary transfers, and other information such as disability status, photo, etc.).

3. Purposes of personal data processing:

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

3.1. Management of potential and recommended candidates

- Identifying potential future candidates
- Encouraging applications

3.2. Management of external candidates

- Ensuring the successful completion of the recruitment process
- Verifying that the candidate's profile meets the requirements for the open position
- Ensuring transparency for candidates (tracking the process and progress of the application)
- Informing candidates about job openings that may be of interest to them

3.3. Ready for appointment (Candidates who will receive a job offer from Aero Technic BG Ltd.)

- Preparing a job offer

3.4. Managing approved candidates (potential candidates, recommended individuals, or external candidates who have already signed a job offer with Aero Technic BG Ltd.):

- Obtaining the necessary documents for drawing up an employment contract

4. Legal basis for processing. The processing of personal data has the following legal bases:

4.1. Potential and recommended candidates

- It is in the legitimate interest of Aero Technic BG Ltd. to identify potential future candidates whose profiles may be of interest to the company and to encourage them to apply for published job vacancies.

4.2. External candidates

- Certain requirements prior to starting work involve the processing of your personal data for the purpose of managing and evaluating your application (i.e., checking how well the applicant's profile matches the company's needs).
- This step is related to the legal obligations of Aero Technic BG Ltd. under the Labor Code.
- It is in the legitimate interest of Aero Technic BG Ltd. to inform candidates about job offers that may be of interest to them and to identify profiles of potential candidates who meet the criteria sought for future positions, as this optimizes the recruitment process.

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4.3. Ready for appointment (Candidates who will receive a job offer from Aero Technic BG Ltd.)

- It is in the legitimate interest of Aero Technic BG Ltd. to process your data for the purpose of preparing a job offer.

4.4. Approved for appointment (Candidates who have signed a job offer from Aero Technic BG Ltd.):

- The processing of your data for the purpose of preparing the employment contract is necessary for the performance and establishment of pre-contractual and contractual relations between the approved candidate and Aero Technic BG Ltd.
- It is in the legitimate interest of Aero Technic BG Ltd. to obtain your photo for the purpose of preparing an employee access badge.
- Obtaining your photo for the purpose of personalizing your account is based on your consent.

5. Recipients of personal data

Your personal data is accessible to authorized employees of Aero Technic BG Ltd., i.e. employees in the Human Resources department responsible for recruitment and managers who hire for a given position, each of whom has separate access rights according to the scope of their responsibilities.

Your personal data will not be disclosed to third parties, except where necessary, to the following companies and their subcontractors, expressly authorized by Aero Technic BG

6. Transfer of personal data

Aero Technic BG Ltd. Bulgaria AD guarantees that personal data will not be transferred outside the EU in the absence of a European Commission adequacy decision (Article 45 of the General Data Protection Regulation, GDPR) or the presence of appropriate safeguards ensuring the security and protection of your personal data (Article 46 of the GDPR).

7. Storage of personal data

7.1. Potential and recommended candidates

Your personal data is stored by Aero Technic BG Ltd. Bulgaria AD for a period of 6 months after the initial registration (performed by the selection team or by your current Aero Technic BG Ltd. employee who recommended you). If you decide to apply for a job advertisement, you become an external candidate. In this case, the storage periods below will apply.

7.2. External candidates

Your data as an external candidate will be stored by Aero Technic BG Ltd. in the CV database for a period of 2 years from the date of your last application so that we can contact you in case there are new job advertisements that match your profile. If you are hired by Aero Technic BG Ltd. and have taken this step prior to your appointment,

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your data collected for these purposes will be stored in your employment file as an employee.

7.3. Ready for appointment and Approved for appointment

Your personal data is stored for the duration of your employment relationship with Aero Technic BG Ltd. Bulgaria AD. After the termination of your employment contract, your personal data will be reviewed and only the data necessary for legal purposes, in particular accounting, tax, or insurance requirements, will be retained for a minimum of 5 years and a maximum of 50 years in the event of a legal dispute.

When these periods expire, your data will be permanently deleted.

8. 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.:

- 8.1. 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;
- 8.1.1. 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;
 - 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.
- 8.2. request that your personal data be corrected when it is inaccurate or needs to be supplemented for the purposes of processing;
- 8.3. 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;
- 8.4. 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;

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- 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;

8.5. 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.

8.6. to withdraw your consent to the processing of your personal data at any time, where the processing is based on your consent;

8.7. to request information about the source of your personal data and, if applicable, whether the data is from a publicly available source;

8.8. 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 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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