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APPROVED:



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Georgi Kanchev
Manager

**Privacy and personal data protection policy
of www.aerotechnic-bg.com
("Privacy Policy")**

Aero Technic BG Ltd. ("we") Aero Technic BG Ltd. appreciates your visit to our website and your interest in our company and products. We take the protection of your personal data seriously and want you to feel comfortable visiting our web pages. We attach great importance to protecting your privacy while processing personal data and take it into account in our business processes.

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").

Other privacy policies:

- Privacy policy for customers and contractors
- Privacy Policy for Access Control and Video Surveillance
- Privacy policy for employees
- Privacy policy for job applicants

In the event of changes in legislation or changes in our internal processes, the privacy policies will be updated in a timely manner.

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.

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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. + 359 888 488 101

2. What is personal data processing?

2.1. **Personal data processing ("processing")** is any action or set of actions that can be performed on personal data by automatic or other 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.

2.2. **Personal data** is any information relating to a natural person (data subject) who is identified or can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to that person.

3. General information on data processing

3.1. Scope

- We collect and use our users' personal data only if and to the extent necessary to provide a fully functional website, as well as for our management and presentation of content and services. We use your personal data to provide you with the services you need, to respond to your questions, and to manage and improve our website.
- Your personal data is not used for any other purposes, in particular it is not used for advertising purposes. Your personal data will not be transferred to third parties without your consent, except in the cases described below and unless we are required to do so by law.

3.2. Legal basis

- If we obtain **the consent of the data subject** for the processing of his/her personal data, Article 6, Section 1a of the General Data Protection Regulation (GDPR) will serve as our legal basis for processing this data.
- Article 6(1)(b) of the GDPR serves as the legal basis for processing personal data necessary for **the performance of a contract** to which the data subject is party.
- Article 6, Section 1c of the GDPR serves as the legal basis for processing personal data necessary for the performance of a legal obligation of our company.
- If the processing is necessary for the purposes of **the legitimate interests** pursued by our company or by a third party, and where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject, Article 6(1)(f) of the GDPR will serve as the legal basis for the processing.

3.3. Data deletion and storage time

- Your personal data will be deleted or blocked as soon as the purpose of storage ceases to be valid (is fulfilled).
- However, data may be stored if this is provided for in European or national laws or other regulatory provisions to which the controller is subject.

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- The data will be blocked or deleted at the end of the storage period prescribed by the above-mentioned standards, unless it is necessary to store the data further in order to conclude or perform a contract.

4. Individual processing activities

4.1. You can use most of our website without providing your personal data.

We store access data without reference to the individual, such as the name of your Internet service provider, the page from which you visit us, the names of the files accessed and the date of access. This data is evaluated solely for the purpose of improving our website and does not contain any information about your identity. Such data includes:

Browser type and version

- Operating system used
- URL address of the referring server
- Host name of the computer used to access
- Names of requested files
- Date and time of the request to the server
- IP address

4.2. Contact forms

- If you wish to send us a message via the contact form provided on our website, you will need to provide additional data:
 - Name
 - Email
 - The message itself
- Alternatively, you can contact us via the email address provided. In this case, your personal data sent by email will be stored.
- In this context, the data will not be disclosed to third parties. The data will only be used to process the conversation.
- The legal basis for the processing of data transmitted with the email is Article 6(1)(a) of the GDPR. We process personal data from the contact form solely for the purpose of establishing contact.

5. Use of cookies

- We use "cookies" that are sent from our web server to your browser during your visit to our website and are stored on your computer for later retrieval. These cookies contain a characteristic string of characters that allows the browser to be clearly identified when the website is accessed again.
- When accessing our website, the user is informed about the use of cookies for analytical purposes and their consent is obtained for the processing of personal data used in this context. In this context, reference is also made to this privacy policy.
- The legal basis for the processing of personal data through technically necessary cookies is Article 6(1)(f) of the GDPR. If the user has given their consent, the legal basis

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for the processing of personal data through cookies for analysis purposes is Article 6(1)(a) of the GDPR.

- The purpose of using technically necessary cookies is to simplify the use of the website for users. Some features of our website cannot be offered without the use of cookies. For this purpose, it is necessary for the browser to be recognized even after a page change.
- The user data collected by technically necessary cookies is not used to create user profiles.
- Cookies are stored on the user's computer and sent to our website from there. As a user, you therefore have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser.
- Most browsers are pre-set to accept cookies automatically. However, you can deactivate the storage of cookies or set your browser to inform you before cookies are stored. Users who do not accept cookies may not be able to access certain areas of our website.

Stored cookies can be deleted at any time. This can also be done automatically.

6. Plugins and tools

6.1. YouTube

- Our website uses plugins from Google's YouTube platform. The pages are operated by YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA.
- If you visit one of our pages equipped with a YouTube plugin, a connection to the YouTube servers is established. The YouTube server is informed of the pages you have visited.
- If you are logged into your YouTube account, you allow YouTube to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account.
- YouTube is used to make the presentation of our online offers attractive. This constitutes a legitimate interest within the meaning of Article 6(1)(f) of the GDPR.
- For more information on how we process user data, please refer to YouTube's privacy policy at: <https://www.google.de/intl/de/policies/privacy>

6.2. Google Maps

- This page uses the map service "Google Maps" via API. The provider is Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.
- To use the functions of Google Maps, it is necessary to store your IP address. This information is usually transferred to and stored on a Google server in the USA. The provider of this page has no influence on this data transfer.
- The use of Google Maps makes the presentation of our online offers attractive and the locations we have indicated on the website easy to find. This is a legitimate interest within the meaning of Article 6(1)(f) of the GDPR.

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- You can find more information about the processing of user data in Google's privacy policy: <https://www.google.de/intl/de/policies/privacy>

6.3. Other plugins and integrations

Our website also uses the following additional plugins and integrations, which may process visitors' personal data:

- Facebook Page Plugin** – allows our Facebook page to be embedded and posts, likes, and interactions to be displayed. When the plugin is loaded, a connection is established with the servers of Meta Platforms Ireland Ltd. and data such as IP address and browser information is transmitted. If you are logged into your Facebook account, Meta may link your visit to your account.
- Twitter Timeline / Twitter API** – we use it to display content from our profile on the X (Twitter) platform. When loaded, a connection is established with the servers of X Corp. and data such as IP address, browser information and possibly profile ID are transmitted if you are logged in.
- Google Analytics** – a web analytics tool provided by Google Ireland Limited, which we use to collect aggregated statistical information about visits and user behavior on the site. Google Analytics uses cookies and other technologies to collect data such as IP address, browser type, devices, pages visited, and time spent on the site. The data is stored on Google's servers and may be transferred outside the EU if appropriate safeguards are in place.
- Cloudflare CDN and security services** – we use Cloudflare, Inc. to protect against malicious traffic and to optimize the loading speed of the website. When accessing the website, a connection is established with Cloudflare's servers and technical data such as IP address, browser type, operating system, and other metadata is processed.

The legal basis for the use of the above plugins and integrations is **Article 6(1)(a) of the GDPR** – consent, where required (e.g., for analytics and marketing cookies), or **Article 6(1)(f) of the GDPR** – legitimate interest in maintaining the functionality, security, and performance of our website.

More information about the data processing of these providers can be found in their privacy policies:

- Facebook: <https://www.facebook.com/privacy/policy>
- Twitter (X): <https://twitter.com/en/privacy>
- Google Analytics: <https://policies.google.com/privacy>
- Cloudflare: <https://www.cloudflare.com/privacypolicy>

7. Security measures to protect the data we store

We are committed to protecting your privacy and treating your personal data with the necessary care. To prevent loss or misuse of data stored by us, we take various technical and organizational security measures that are regularly reviewed and adapted to technological progress.

8. Hyperlinks to external websites

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Our website contains so-called hyperlinks to the websites of other providers. When these hyperlinks are activated, you are redirected from our website directly to the websites of other providers. You can recognize this, for example, by the change in the URL. We cannot accept any responsibility for the confidentiality of your data on these third-party websites, as we have no influence on the compliance of these companies with data protection policies. You can find out how these companies process your personal data directly on these websites.

9. Your rights as a data subject

9.1. Right to information

You can ask the controller to confirm whether your personal data is being processed by them. In this case, you may request the following information from the controller:

- the purposes for which the personal data is processed;
- the categories of personal data being processed;
- the recipients or categories of recipients to whom your personal data has been or is still being disclosed;
- the planned duration of the storage of your personal data or, if specific information on this is not possible, the criteria for determining the storage period;
- the existence of a right to rectify or erase your personal data, a right to restrict the processing of data by the controller, or a right to object to such processing;
- the existence of a right to lodge a complaint with a supervisory authority;
- all available information on the origin of the data, if the personal data has not been collected directly from the data subject.

You have the right to request information on whether your personal data is transferred to a third country or to an international organization. In this regard, you may request that the relevant safeguards be provided to you in accordance with Article 46 of the GDPR in relation to data transfers.

9.2. Right to rectification

You may request that the controller correct and/or supplement your personal data if it is incorrect or incomplete. The controller is obliged to make the correction without delay.

9.3. Right to restriction of processing

You may request that the processing of your personal data be restricted under the following conditions:

- if you contest the accuracy of your personal data;
- if the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;
- if the controller no longer needs the personal data for the purposes of the processing, but you need it to assert, exercise, or defend legal claims; or
- if you have objected to the processing pursuant to Article 21(1) of the GDPR and it has not yet been determined whether the legitimate grounds of the controller override your grounds.

If the processing of your personal data has been restricted, such data may be processed, except for storage, only with your consent or for the purpose of asserting, exercising or

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defending legal claims or protecting the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

If the restriction on processing has been imposed under the above conditions, the controller will inform you before it is lifted.

9.4. Right to erasure

9.4.1. Obligation to erase

You may request that we erase your personal data immediately, and we are obliged to do so immediately, if:

- Your personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- You withdraw your consent on which the processing is based in accordance with Article 6(1)(a) or Article 9(2)(a) of the GDPR, and there is no other valid legal basis for the processing.
- You object to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) of the GDPR.
- Your personal data has been processed unlawfully.
- The erasure of your personal data is necessary for compliance with a legal obligation under EU law or the law of the Member States to which we are subject.
- Your personal data has been collected in relation to information society services offered in accordance with Article 8(1) of the GDPR.

9.4.2. Information for third parties

- If we have made your personal data publicly available and are obliged to delete it in accordance with Article 17, Section 1 of the GDPR, we will take appropriate measures, including technical measures, taking into account the available technology and implementation costs, to inform the processors of personal data about the personal data for which you, as the data subject, have requested the deletion of all links to it or its copies or replicas.

9.4.3. Exceptions

The right to erasure is excluded if and to the extent that processing is necessary

- to exercise freedom of expression and information;
- for compliance with a legal obligation which requires processing by EU law or the law of the Member States to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health pursuant to Article 9, sections 2h and i, and Article 9, section 3 of the GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the GDPR, insofar as law is likely to render impossible or seriously impair the achievement of the objectives of such processing; or

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- to establish, exercise, or defend legal claims.

9.5. Right to information

- If you have requested us to correct, delete or restrict the processing of your personal data, we are obliged to inform all recipients of your personal data about this correction or deletion of data or restriction of processing, unless this proves impossible or requires disproportionate effort.
- You have the right to be informed about such recipients.

9.6. Right to data portability

- You have the right to receive the personal data you have provided to the controller in a structured, accessible, and machine-readable format. You also have the right to transfer this data to another controller, provided that
 - the processing is based on consent pursuant to Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR or on a contract pursuant to Article 6(1)(b) of the GDPR and
 - the processing is carried out automatically.
- When exercising this right, you also have the right to request that your personal data be transferred directly from us to another controller, insofar as this is technically feasible.
- The rights and freedoms of others must not be affected by this.
- The right to portability does not apply to the processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

9.7. Right to object

- You have the right to object at any time to the processing of your personal data in accordance with Article 6(1)(e) or (f) of the GDPR; this also applies to profiling based on these provisions.
- We will not process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the processing is for the establishment, exercise or defense of legal claims.
- Notwithstanding Directive 2002/58/EC, you have the option to exercise your right to object to the use of the services of an information company through automated procedures based on technical specifications.

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9.8. Right to withdraw consent for data protection

- You have the right to withdraw your consent to the processing of personal data at any time.
- The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9.9. Right to lodge a complaint with a supervisory authority

- Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the provisions of the GDPR. The competent supervisory authority in the Republic of Bulgaria is:

Commission for Personal Data Protection
 Address: Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.
 Email: kzld@cpdp.bg
 Website: www.cdpd.bg

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