

# Privacy Policy

## Privacy Notice

As the operators of [www.balkan-aviation.com](http://www.balkan-aviation.com), [www.balkanparts.com](http://www.balkanparts.com) ("Website"), Balkan Aviation Limited, a company registered Bulgaria with VAT number BG203060499 having its registered address at 5, Gotse Deltsev Str., 2<sup>nd</sup> Floor, city of Petrich - 2850, province of Blagoevgrad ("Balkan Aviation", "We", "Us", "Our") is committed to protecting and respecting your privacy. This Privacy Policy ("Policy") together with our [Standard Terms and Conditions](#) ("Terms") and any other documents referred to therein, sets out the basis on which the personal data collected from you, or that you provide to Us will be processed by Us. Please read this Policy carefully to understand our views and practices regarding your personal data and how we will treat it.

## Data Controller

For the purpose of the [Data Protection Art. 32 and Art. 34](#) (the "Act"), the Data Controller is Balkan Aviation Limited.

Our policy complies with BG law accordingly implemented, including that required by the GDPR and to the transposition of the the [Data Protection Directive with Respect to Law Enforcement \(Directive \(EU\) 2016/680\)](#).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.cdpd.bg](http://www.cdpd.bg).

## The personal data we collect about you

Personal data includes any information about an individual from which that person can be identified. It does not include personal data where the identity has been removed (anonymous data).

We collect, use, store and transfer different kinds of personal data about you. We have grouped together the following categories of personal data to explain how this type of information is used by us. These terms are used throughout this notice:

- **"Identity Data"**: including your first name, middle names, last name, username or similar identifier.
- **"Contact Data"**: including your or your company's billing address, delivery address, email address and telephone numbers;
- **"Financial Data"**: including your or your company's bank account, we do not keep records for card details;
- **"Services Data"**: including details about payments to and from you or your company and other details of services you have purchased from us or we have purchased from you;
- **"Profile Data"**: including your usernames and passwords, purchases or orders made by you or your company, feedback and survey responses;
- **"Marketing and Communications Data"**: including information collected about you or your company's product interest. Additional information about the personal data we process in connection with marketing is included with the marketing communications we send you;

- "Professional Information": including your contact details and job title, email address, phone number and addresses; and
- **"Professional History"**: including your email address, phone number, address and positions, maybe stored on file for company's which you were previously associated with.

Neither our website or the services we offer are intended for children and we do not knowingly collect data relating to children.

If you have provided Us with the personal data of another person, including providing us with their email address, you confirm that he/she consents to the processing of his/her personal data and that you have informed him/her of our identity as a Data Controller and provided him/her with a copy of this Privacy Policy and our Terms.

### **If you fail to provide personal data to us**

Where we need to collect personal data by law or under the terms of a contract, we have with you and you fail to provide the personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a product or services). In this case, we may have to decline to provide or receive the relevant services, but we will notify you if this is the case at the time the personal data is collected.

### **Uses made of your information**

We will only process (i.e., use) your personal data when the law allows us to, that is, when we have a legal basis for processing.

We use your personal data in the following circumstances:

- **"Performance of a contract"**: where we need to perform a contract which we are about to enter into or have entered into with you;
- **"Legal or regulatory obligation"**: where we need to comply with a legal or regulatory obligation that we are subject to;
- **"Legitimate interests"**: where necessary for our interests (or those of a third party), provided that your fundamental rights do not override such interests. This can mean, for instance, that it is in our interest, to monitor how you are using any customer portals we set up for you or access to systems to ensure that the security of such portals or systems is maintained. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests; and
- **"Consent and explicit consent"**: where you have provided your consent or explicit consent to processing your personal data.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

With limited exceptions (for instance, in relation to some of our electronic marketing), generally we do not rely on consent as the legal basis for processing your personal data. You have the right to withdraw consent to electronic marketing at any time by following the unsubscribe instructions in such marketing materials or by contacting us at [info@balkan-aviation.com](mailto:info@balkan-aviation.com).

### **Where we store and process personal data**

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who

work for Us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### **How do we secure personal data?**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk of processing, including:

- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

We ensure that those who have permanent or regular access to personal data, or that are involved in the processing of personal data, or in the development of tools used to process personal data, are trained and informed of their rights and responsibilities in when processing personal data.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used of accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. This includes for example the purposes of satisfying any legal, regulatory, reporting or accounting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

It is a legal requirement in Bulgaria to keep basic information about customers (including Contact, Identity, Financial and Transaction Date) for ten years even after they cease being customers.



## **IP Addresses**

We may collect information about your mobile phone, computer or other device from which you access the Website including where available your IP address, operating system and browser type, for systems administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may, however, use such information in conjunction with the data we have about you in order to track your usage of our services.

## **Disclosure of your information**

We may disclose your personal information to third parties:

- in the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if We or substantially all of our assets are acquired by a third party, in which case personal data held by Us about our customers will be one of the transferred assets; or
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms, this Privacy Policy and other agreements; or
- to protect the rights, property, or safety of Company, the Website, our users and any third party we interact with to provide the Website.

## **Your Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include:

- The right to request access to your personal data
- The right to request correction of your personal data.
- The right to request the erasure of your personal data
- The right to object to processing of your personal data
- The right to request restriction of processing your personal data
- The right to request the transfer of your personal data

If you wish to exercise any of the rights set out above, please contact us at [info@balkan-aviation.com](mailto:info@balkan-aviation.com)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Changes to our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. Any changes We may make to our Privacy Policy in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

## Resources & Further Information

### 1. Local data protection laws and scope

- [Constitution Republic of Bulgaria En.pdf \(cpdp.bg\)](#) (Art. 32 and Art. 34) – lays the foundations of the fundamental right of privacy;
- [General Data Protection Regulation](#) (the **GDPR**) - PDPA applies along with the GDPR with the purpose of providing additional protection in cases where the GDPR does not contain a specific provision;
- Personal Data Protection Act - КЗЛД (cpdp.bg) (the **PDPA**) - the main data protection law in Bulgaria, implements the GDPR;
- [Electronic Communications Act - КЗЛД \(cpdp.bg\)](#) - regulates the public relationships pertaining to carrying out electronic communications; includes some provisions related to personal data protection;
- [Rules on the Activity of the Commission for Personal Data Protection and its Administration - КЗЛД \(cpdp.bg\)](#) – secondary legislation.

### 2. Data protection authority

- [The Personal Data Protection Commission](#) (the **Commission**)
- [Inspectorate with the Supreme Judicial Council](#) (the **Inspectorate**)

### 3. Further Information

- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)

Thank you.

**The Balkan Aviation Ltd. team.**

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2850 Petrich, Bulgaria

Tel (BG) **+359 74520171** between 0900h & 1800h ( UTC +2h )