



Privacy Notice:

Data Protection Statement for Lufthansa Technik Sofia Ltd. Customers

With this Privacy Notice we want to inform you about the potential collection and processing of your personal data as well as about the rights you are entitled to in your quality of Data Subject. We seriously take care of your privacy and we assure our best commitment in the protection of the personal data you may share with us. We will be clear and transparent about the information we are collecting and what we will do with that information. Your personal data will be processed lawfully, fairly and limited to what is strictly necessary, in a manner that ensures appropriate security to that data.

1. Contact data:

The Data Controller who determines the purposes and means of the processing of your personal data is:

Lufthansa Technik Sofia Ltd.

Address Airport Complex – Terminal 1, Block 3, 1540 Sofia, Bulgaria

Phone + 359 2 460 1666

E-Mail reception@lht-sofia.com

You can contact our Data Protection Coordinator at gdpr@lht-sofia.com

2. Purpose and legal basis:

We may collect and process your personal data if:

- You have given your consent to us to the processing of your personal data for one or more specific purposes (e.g. for marketing purposes) – **Art.6, 1a EU GDPR.**
- Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract – **Art.6, 1b EU GDPR.**
- Processing is necessary for compliance with legal obligation to which we are subject according to Bulgarian, German and/or EU law (e.g. contract obligation) – **Art.6, 1c EU GDPR.**
- Processing is necessary for the performance of a task carried out in the public interest according to Bulgarian, German and/or EU law – **Art.6, 1e EU GDPR.**

We will only process your personal data where we have a legal ground to do so. The legal ground will depend on the reasons we have collected and need to use your personal data for. Sometimes your prior consent will not be necessary because other legal grounds set forth in article 6 of GDPR justify the processing of your personal data.

3. Recipients:

We may be required to forward your personal data to third parties within or outside the Lufthansa Technik Sofia in order to be able to offer you our products and services on the basis of our contractual obligations or our legitimate interests. These recipients can be categorized as follows:



- Service providers
- Transportation and logistics
- Marketing
- IT
- Government bodies and authorities
- Members of the Lufthansa Technik Group

We are also obligated by law to provide personal data to Bulgarian and international authorities (Article 6 (1) point (c) of the GDPR in conjunction with local and international regulations and agreements.

4. Transfers to third countries (outside EU):

In the process, personal data may be transferred to third countries or international organizations. In order to protect you and your personal data, there are suitable safeguards in such cases as stipulated by and in compliance with statutory requirements (in particular the use of EU standard contractual clauses) or there is an adequacy decision adopted by the EU Commission (Article 45 of the GDPR).

5. Storage period:

Your personal data is erased as soon as it is no longer required for the specified purposes. It may be the case that personal data is retained for the period of time in which claims may be asserted against Lufthansa Technik Sofia. In addition, personal data is stored if and for as long as Lufthansa Technik Sofia is obligated by law to do so. Such documentation and retention obligations are stipulated by the Bulgarian law on personal data protection. You can find additional information and specification of the storage periods at the end of this document.

6. Data subject's rights:

Lufthansa Technik Sofia is committed to the fair and transparent processing of data. We therefore believe it to be important that data subjects not only have the right to object, but can also exercise the following rights, if the relevant legal requirements are fulfilled:

- **Right to access personal data and obtain information** (Article 15 of the GDPR): You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed and:
 - the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipients;
 - the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - the right to lodge a complaint with a supervisory authority.
- **Right to rectification** (Article 16 of the GDPR): You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you.
- **Right to erasure** ("right to be forgotten") (Article 17 of the GDPR): You have the right to obtain from the controller the erasure of personal data concerning you.



- **Right to restriction of processing** (Article 18 of the GDPR): You have the right to obtain from the controller restriction of processing personal data concerning you if the following applies:
 - You claim that your personal data is incorrect;
 - When the processing is unlawful, but instead of requesting the erasure (deletion) of the data, you prefer to have its processing restricted;
 - When the controller no longer needs the data for the purposes of processing, but you need them for the establishment, exercise, or defense of legal claims;
 - When you have objected to processing based on legitimate interest – pending verification of whether the controller's legitimate grounds override yours.
- **Right to data portability** (Article 20 of the GDPR): If processing is based on your consent or if the data is processed automatically for the performance of a contract, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format, or to request that it be transmitted to another controller.
- **Right to withdraw consent** (Article 7(3) GDPR): If you have given consent for data processing, you may withdraw your consent at any time with future effect. The withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

7. Right to object (Article 21 GDPR)

If we process your data based on our legitimate interests, you have the right to object to this processing at any time by contacting us at gdpr@lht-sofia.com, provided that your objection is based on grounds relating to your particular situation.

In that case, we will cease processing your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing serves the establishment, exercise, or defense of legal claims.

8. Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

In addition, you have the **right to lodge a complaint** with a **data protection supervisory authority**. The competent supervisory authority for Lufthansa Technik Sofia Ltd. is:

Commission for Personal Data Protection

Address : 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592 , Bulgaria

Web-site : www.cdpd.bg

Email: kzld@cpdp.bg

To exercise your rights, please contact us or our Data Protection Coordinator using the contact details provided in Section 1.

9. Background of processing:

The provision of your personal data by you is based on **Art.6, 1b EU GDPR**. (Performance of a contract). If you do not provide the required data, this may result in: Inability to enter into contractual relationship.

10. Automated decision-making:

We do not process your personal data based on automated decision-making.



11. Change of purpose:

If we intend to further process your personal data for a purpose other than that for which it was collected, you will be provided with information about this other purpose and all other relevant information prior to this further processing.

12. Categories of personal data:

- Names
- Job title
- e-mail address
- phone number
- Date of birth
- Passport data (and in some cases scanned copies)
- Work (company) address
- Criminal record
- Travel itineraries
- Hotel reservations
- Photos

13. Source of personal data:

We collect the personal data directly from you.

14. Specification of the personal data storage periods

- **Visitor registration system [t-gate]** (*names, date of birth*) are stored for 5 years on the basis of Art. 6 (1)(c)(f) GDPR, Art. 7 of the German Aviation Security Act and Art. 8 of the German Regulation on Reliability screening for Aviation Security.
- **CCTV** (*image and video*) – are stored for 2 months on the basis of Art. 56 (4) of Bulgarian Private Security Law.
- **Access control** [LTSF access pass] (*names, photo, company*) are stored for the validity of the pass or upon its return on the basis of Art.6(b) GDPR and Lufthansa Technik Sofia Security Program
- **Airport access permit** (*copy of passport/ID, company*) are stored for 12 calendar months on the basis of Art.6(b) GDPR, Controller decision based on the Bulgarian National Civil Aviation Security Program
- **Contract data** are stored on the basis of Art.6(c) GDPR, Art.12 Bulgarian Accountancy Act
- **Hotel accommodation** – (*names*) the confirmation letter is kept until the check out date/invoice is kept on the basis of Art.6(c) GDPR, Art.12 Bulgarian Accountancy Act
- **Travel** itineraries (*names and date of birth*) are stored until the travel is completed/ invoice is kept on the basis of Art.6(c) GDPR, Art.12 Accountancy Act
- **Invitation letters for persons from countries outside of European Union** (*names, date of birth, passport number, company address*) are stored for 90 days maximum based on the validity period of Schengen visa, Regulation (EC) No 810/2009

In a situation where personal data is processed on the basis of Art.6(f) GDPR, the Controller performs a Balancing of Interests.

This document is subject to an update when required due to system changes, legal changes, identified risks, etc.

For further information regarding the storage periods and relevant documentation, please contact gdpr@lht-sofia.com