
PERSONAL DATA PROTECTION POLICY

The purpose of this "Privacy Policy" is to inform you how "EGT JET" Ltd. processes your data and what personal data it would collect for you, for what purpose, term and respectively what are your rights.

INFORMATION ABOUT EGT JET LTD

EGT JET LTD with UIC 205537060, with seat and registered address: Sofia, Vranja-Lozen-Triugulnika area, 4 Maritsa Str. ("EGT JET" / "We"), tel: +359 876147100; e-mail: office@egt-jet.com

Contacts of the Personal Data Protection Officer: Desislava Dimitrova, e-mail: dpo@egt-jet.com.

ATTITUDE TO YOUR PERSONAL DATA

We collect and process personal data in compliance with the requirements of local and European legislation. The security of the data you entrust to us is important to us, which is why we protect your data by applying all appropriate technical and organizational means at our disposal to prevent unauthorized access, unauthorized or malicious use, loss or premature deletion of information.

WHAT INFORMATION DO WE COLLECT AND WHY?

We may collect personal information about you when you use the corporate website or use our services. In most cases, we require your personal data in order to enter into a contract, comply with a legal obligation or protect a legitimate interest. Of course, with some of the services we offer, you provide this information yourself, choosing and agreeing to send information about yourself. Without this data, the relevant services could not be provided.

If you do not provide identification, you will not be able to enter into a contract with Us for a product or service. Depending on the services you use, We may collect and process the following information about you:

The personal data that may be processed is the following:

- Names, home address, email address, telephone number, passport number and other valid data identity document, credit/debit card details or other payment details;
- Preliminary passenger information, which includes your name, nationality, date of birth, gender, passport or ID card number, expiration date and country in which they were issued;
- Diseases of passengers who have special medical requirements and/or nutritional needs;
- Letters and e-mails that we receive from you during our communication.

When assisting us for the purposes of applying for and obtaining a visa when travelling abroad, we could also collect and process:

- A copy of an international passport and a photo.

PURPOSES IN THE PROCESSING OF YOUR DATA

We process the collected personal data most often with the following purposes:

- **Processing of the data necessary for concluding or fulfilling a contract:**
 - Establishing the identity of the client through all trade channels;
 - Preparation of offers, contracts and all other documents accompanying the contract;
 - For the purposes of providing the service;
 - Notifications related to the company's products and services.
- **Processing of the data necessary for the fulfilment of regulatory obligations:**
 - Obligations, provided in the Law for the accounting and the Tax-insurance procedural code, as well as other related regulatory acts, in connection with the keeping of correct and lawful accounting;
 - Obligations to provide information to all state commissions and regulatory bodies;
 - Providing information to the court and law enforcement agencies.
- **Data processing based on your consent:**
 - For direct marketing for products and services offered by us.

- **Data processing based on legitimate interest:**
 - Checking customer satisfaction when using our products and services.

TO WHOM DO WE SHARE YOUR DATA?

We use third parties to support certain contractual activities in which your personal data may be shared. When fulfilling a legal obligation, your data can also be shared. EGT JET does not provide your personal data to third parties without assurance that all technical and organizational measures have been taken to protect this data, striving for strict control.

Some of the recipients of personal data can be:

- Transport companies; domestic and international airports, tour operators and travel agents, insurers, accounting and law firms, banks, contractors who maintain equipment, software and hardware used to process personal data; hosting companies, etc.

The provision of personal data in some cases is mandatory to comply with legal requirements such as:

- Regulatory authorities, incl. state commissions; customs and border crossings; institutions and agencies; SANS, NRA; NSSI; courts; prosecution and others to whom we have an obligation to provide personal data under applicable law.

USE OF COOKIES ON THE SITE

We do not collect or process personal data through the functional cookies used by the Company.

WHY AND HOW DO WE USE AUTOMATED ALGORITHMS?

We do not use automated decision-making tools.

SECURITY

We apply measures to protect personal data from accidental loss and unauthorized access, use, alteration or disclosure. There are policies and procedures designed to protect information from loss, misuse and unauthorized disclosure. We also take additional information security measures, including access control, physical protection and reliable practices for collecting, storing and processing information.

On the other hand, We apply technical measures such as encryption, pseudonymization and anonymization of the collected personal data, where possible.

FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data will be stored in accordance with the statutory deadlines (including the Civil Aviation Act, the Accounting Act, etc.). We do not keep your data indefinitely.

We store your personal data related to your flights (PNR) for 5 years from your flight with us.

In the case of data processing based on consent, personal data will be processed until the withdrawal of consent.

TRANSMISSION OF DATA OUTSIDE THE EU / EEA

In the event that you enter into a contract with us for the carriage of passengers to a non-EU/EEA country, your data may be transferred outside the EU / EEA for the purposes of fulfilment of the contract concluded between us, according to art. 49, item 1, letter "b" of Regulation 2016/679 - GDPR. Without the transfer of data, it is impossible to provide our service.

The transfer of your personal data outside the European Economic Area is necessary to provide you with the service you have requested, and your personal data may be made available to data processors and service providers in countries that do not provide the same level of data protection, as provided for in the European Economic Area. We take appropriate measures with respect to the recipients of your personal data to ensure an adequate level of protection as determined by the applicable data protection law, in particular through the application of standard contractual clauses or a decision on the adequacy of data protection of the European Commission (or, for personal data originating in the United Kingdom, a decision on the adequacy of the Secretary of State of the United Kingdom), which states that the country in which the recipient of the transferred personal data is located provides an adequate level of data protection.

Please note that the transfer of such data may involve some risks, in particular, the risk that third parties may have access to the data in question in the recipient's country and that you may not be able to exercise your rights as a data subject and/or your right to object to actions that could harm your personal data and your right to privacy.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

- **Access to information:** this right allows you to obtain a copy of the personal data we hold for you, and check if we have a legal basis for their processing.
- **Correction:** this right allows you to ask us to correct any incomplete or inaccurate information about you.
- **Deletion:** this right allows you to ask us to delete or remove your personal data when we have no valid reason to continue processing it. You also have the right to request your data to be deleted or removed when you have exercised your right to object to its processing.
- **Objection to processing:** in cases where we rely on our legitimate interests as a basis for processing, you may object to such processing.
- **Restriction of processing:** this right allows you to ask us to temporarily suspend the processing of your personal data if, for example, you wish to establish the accuracy of the data or the reasons for their processing.
- **Data portability:** this right is limited to cases where the data is provided to us by you for the purposes of a contract and allows you to require us to provide your electronically stored data to a third party.

You may at any time withdraw your consent for the collection, storage and use of your personal data in respect to Us. However, the withdrawal will not legally affect the data processed until the withdrawal.

Some of your rights, such as deleting data or objecting to the processing, may be restricted by applicable law.

The applications for exercising rights are submitted personally or by a person explicitly authorized by you through an explicit written power of attorney. An application may also be submitted electronically in accordance with the Electronic Document and Electronic Signature Act.

We inform you that if the data is processed illegally, under this legislation you have the right to contact the Commission for Personal Data Protection - Sofia 1592, Blvd. "Prof. Tsvetan Lazarov" 2, or www.cdpd.bg.

CHANGES TO THE CURRENT PRIVACY POLICY:

This Privacy Policy may be changed from time to time. Such changes will take effect immediately after their announcement. Regularly reviewing this page ensures that you will always be aware of what information we collect, how and for what purposes we use it, and under what circumstances (if any) we will share it with other parties.

If you have questions regarding data protection, you can contact the Data Protection Officer by e-mail: dpo@egt-bg.com.

This Privacy Policy was last updated on 01.01.2021.