



## DATA PROTECTION POLICY

**FLY2SKY OOD** processes your personal data in order to provide you with better and diverse products and services. The security of the data you entrust to us is of great importance for the success of our business. That 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.

We collect and process personal data only in compliance with the requirements of the legislation of the Republic of Bulgaria and European legislation. Your data will only be processed when a specific reason arises.

This Data Protection Policy is intended to explain to you how and why we process your personal data.

We would like to introduce you to the following concepts:

### Definitions:

**"Data controller"** means a natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by EU law or the law of a Member State, the controller or the specific criteria for its determination may be laid down in EU law or in the law of a Member State.

**"Data processor"** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.

**"Processing of personal data"** means any operation or set of operations carried out with personal data or a set of personal data by automatic or other means such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, consulting, using, disclosing by transmitting, distributing or otherwise making the data accessible, arranging or combining, restricting, deleting or destroying it."

**"Personal data"** means any information relating to an identified or identifiable living natural person. Individual data which, when put together, may lead to the identification of a specific person, also constitute personal data. Examples of personal data: first name and surname, home address, identity card number, PIN, etc.

### Data protection policy

Fly2Sky OOD, UIC: 202853045, with registered office and address of management: Sofia 1528, Iskar region, 7 Iskarsko shose Blvd., building 1, floor 2, is a personal data controller, hereinafter referred to as in short, the "Data controller" within the meaning of the General Data Protection Regulation (Regulation (EU) 2016/679) of the European Parliament and of the Council. You can contact the Data controller by email: [am@fly2sky.aero](mailto:am@fly2sky.aero).

This POLICY contains information about the collection, processing and storage of personal data by the Data controller, as well as the rights of individuals in relation to the protection of their personal data.



The Data controller shall operate in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95 / 46 / EC (General Regulation on Data Protection), as well as with all relevant regulations at national and international level in the field of personal data protection.

**"Fly2Sky" OOD has the following principles, which it observes when processing your personal data:**

1. legality, good faith and transparency;
2. restriction of the purposes of the processing (collection of personal data for specific, explicitly indicated and legitimate purposes);
3. correction (if the data are inaccurate);
4. expediency, according to the purposes of personal data processing;
5. limiting storage in order to achieve the objectives ("minimizing data");
6. accuracy and timeliness of the processed data;
7. ensuring security at an appropriate level regarding the protection of personal data;
8. storage of the data for a period not longer than necessary for the purposes for which the personal data are processed.

This Data protection policy will apply to the following category of subjects in the implementation of any communication with you users - from inquiries, completing questionnaires, through the conclusion and implementation of contracts we sign with you:

**Data subjects:**

1. natural persons, users of the Site - <https://www.fly2sky.aero/> without registration;
2. individuals, users of the Site - <https://www.fly2sky.aero/> as Users and Clients;
3. natural persons who have sent inquiries, filled in questionnaires (including by phone), requests, signals, complaints or other correspondence to Fly2Sky OOD;
4. natural persons, information about whom is contained in inquiries (including by phone), requests, signals, complaints or other correspondence addressed to Fly2Sky OOD;
5. natural persons with whom we conclude contracts.

The Data controller collects, processes and stores personal data that you provide to us for the following purposes:

- for realization of contractual relations, which have arisen in connection with its subject of activity, by individualizing the parties to the contract and the persons, who are indicated for contact, taking into account the regulation requirements in the Republic of Bulgaria and the European Union;
- management and execution of your requests for the services provided by "Fly2Sky" OOD;



- notification of everything related to the products and services you use with us;
- accounting purposes;
- for marketing purposes, with the express consent of you;

**This Data protection policy applies to all employees of Fly2Sky OOD.**

We would like to inform you that you can browse our website without entering any personal data. In cases when you want to send an inquiry to us, we need to receive your personal data so that we can respond to your inquiry and provide you with the requested information. In this case, we need to obtain your consent to the processing of your personal data. The Data controller collects, processes and stores personal data in connection with the conclusion and execution of transactions with its customers.

**Personal data we process:**

- Which you provide:

It is impossible for us to provide you with our services and fulfill our obligations to you, as well as to answer your inquiries if you do not provide us with information. You decide whether and how to use our Services or the opportunity to make requests and inquiries to us. The forms on the Site, through which personal data are entered, clearly indicate the category of personal data that you must provide to us in case you want to receive the specific service you are interested in or a reply by us.

The data, the completion of which is obligatory, is essential and without it, it is impossible to provide the respective Service or part of it, to answer your questions or to conclude the respective contract - name and surname, e-mail address and telephone number.

In your request you might decide to share personal data that We do NOT require, but there is no way to prohibit in view of freedom of expression.

**Data required for executing a contract between you and us:**

The contracts that will be concluded should contain the following personal data that we will require from you: three names, PIN, permanent address / current address, email, telephone number. In addition - in the course of our activities, we require from our customers and current address, telephone, email address in order to facilitate communication between us.

**Information about your use of our website** - IP address, operating system, browser, search queries and content viewed. This information is collected in order to improve and personalize user searches. In addition, we collect information from your computer, phone, tablet or other device that you use for our services, to enter into a contract between us or when sending inquiries / filling out peers through the form on our Site.

If you leave a post or comment on this website, your IP address will be saved. This is for the safety of the website operator: If your text violates the law, they would like to be able to track your identity.

In the event that you provide your personal data to Fly2Sky OOD or the company's employees via Viber, Skype, Facebook or other social network, we would like to inform you that these websites have their own privacy policies and that we do not accept any responsibility or liability for these rules. In this regard, we



recommend that you check these rules before sending us your personal data through these websites / applications.

The Data controller does NOT collect, store, process special categories of data (so-called "sensitive data"), which are subject to specific processing conditions, namely: personal data revealing racial or ethnic origin, political views, religious or philosophical beliefs; membership in a professional organization; genetic data, biometric data processed solely for the purpose of identifying you as a human being; health data; data on a person's sexual life or sexual orientation, and does not perform automated decision-making with sensitive data.

The Data controller does NOT collect, store, process personal data related to convictions and violations, according to Art. 10 of Regulation (EU) 2016/679.

The Data controller stores your personal data while determining the appropriate storage period, takes into account the amount and nature of personal data, the purposes for which it processes them, and whether we can achieve these purposes by other means. The Data controller also complies with the relevant legal requirements for storage of certain categories of data in order to fulfill its obligations arising from a regulatory act or a contract, as well as to protect our legal rights in the event of a claim. The Data controller will not store your personal data for a period longer than necessary to achieve the purposes for which it processes them. When the need to store personal data is eliminated, the Data controller will delete or destroy your personal data in a secure manner and without undue delay.

The Data controller independently collects and processes your personal data provided by you. All personal data is stored on the territory of the Republic of Bulgaria, and the Data controller does not transfer your personal data to third countries. Only in the cases provided for in a normative act, the personal data will be provided to third parties.

#### **Your rights in connection with the processing of your personal data:**

- **Right to information** - You have the right to request from us information whether and to what extent we process and store personal data, for what purpose and on what grounds we process and store personal data;
- **Right of access to your personal data** (so-called "request for access to data"). This allows you to receive a copy of your personal data held by the Administrator and to check whether we process them in the manner prescribed by law;
- **Right to correction** - In case we process incomplete or erroneous / erroneous data, you have the right, at any time, to request that we correct or supplement them;
- **Right to be deleted** ("right to be forgotten") - This allows you to ask us to delete or remove without undue delay all or part of your personal data, if there is no reason to continue to process and store them;
- **Right to restrict processing** - You can request a restriction on the personalized data being processed if: you dispute the accuracy of the data, for the period in which we have to check its accuracy; the processing of the data has no legal basis, but instead of deleting it, you want its limited processing; we no longer need this data (for the specified purpose), but you need it to establish, exercise or defend



legal claims; you have filed an objection to the processing of the data, pending verification of the legal grounds of the Data controller;

- **Right to data portability** - This allows you to request that we present the personal data that you have entrusted to our care in a suitable electronic format, and you have the right to transfer them to another Data controller in a suitable electronic format;

- **Right to withdraw your consent** - You can withdraw your consent for all or only part of your personal data, as well as for specific or all purposes of processing. If you have consented to the collection, processing and storage of your personal data for a specific purpose, you have the right to withdraw it at any time regarding this specific type of processing. Once you notify us that you are withdrawing your consent, we will stop processing them for the purpose or purposes you originally agreed to, unless there is another reason to continue that processing;

- **Right to object** - You have the right to object to the processing of your personal data if we do not prove that there are compelling legal grounds for the processing that take precedence over your interests, rights and freedoms as your data subject, or to establish, exercise or defend legal claims, the Data controller will terminate the processing immediately. You have the right to object if your personal data is processed for direct marketing purposes, due to our legitimate interest, without your consent;

- **Right of appeal** - In case you think we are violating the applicable regulations, please contact us to clarify the issue. Of course, you have the right to lodge a complaint with the Data Protection Commission. You can also lodge a complaint with a regulatory body within the EU;

- **The right to be notified in the event of a breach of the security of your personal data, which may pose a high risk to your rights and freedoms.** The Data controller will inform you without undue delay and in an appropriate manner when such a violation is established, as well as about the measures that have been taken or are to be taken.

To exercise any of your rights listed above, please send a free text request or notification to the following email address: [am@fly2sky.aero](mailto:am@fly2sky.aero). Please note that we may ask you for specific information to help us verify your identity and respect your right of access to information or any of your other rights. The purpose of this additional security measure is to ensure that your personal data will not be disclosed to persons who are not entitled to receive it. The exercise of the above rights does not require the payment of a fee on your part. However, we may charge a reasonable administrative fee if your request for access is manifestly unfounded or if the requests are repeated or excessive. In such circumstances, we may also refuse to comply with the request.

If you believe that your rights of personal data protection have been violated, you have the right to file a complaint to the national competent authority for personal data protection, namely: Commission for Personal Data Protection (CPDP), address: Sofia, Blvd., „Prof. Tsvetan Lazarov ”№ 2, e-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg), website: [www.cdpd.bg](http://www.cdpd.bg). You can appeal against actions and acts of the personal data controller in court before the respective Administrative Court or the Supreme Administrative Court under the general rules of jurisdiction.

The Data controller ensures the protection of your personal data by following strict procedures and certain internal security rules when storing your personal data in order to protect it to the highest degree and to prevent unauthorized access, accidental loss, damage, destruction. The Data Controller



and his team strive to improve security measures, taking into account the progress and implementation of new technologies.

In order to apply the most up-to-date protection measures and in order to comply with current legislation, we will regularly update this Data Protection Policy. If the changes we make are significant, we may post a notice of the changes on our website. All changes, additions and amendments to this Data Protection Policy will be made in compliance with the requirements of applicable law.