

PRIVACY NOTICE

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1. Introduction

When you use our DANUBE FAB website or services, you are trusting us with your information. This privacy notice is to let you know how DANUBE FAB will look after your personal information. This includes what you tell us about yourself and what we learn from you as a website user. This privacy notice explains how DANUBE FAB will use your information, who we share your information with and informs you about your privacy rights.

The DANUBE Functional Airspace Block was formally established by the Republic of Bulgaria and Romania under the "Agreement on the establishment of the DANUBE Functional Airspace Block", which was signed in Brussels on 12 December 2011 by the governments of Romania and the Republic of Bulgaria. DANUBE FAB website is managed by Bulgarian Air Traffic Services Authority (BULATSA) and Romanian Air Traffic Services Administration (ROMATSA).

DANUBE FAB will;

- Keep your personal information safe and secure
- Not use or share your personal information other than as set out in this privacy notice
- Allow you to have access to your personal information upon request at all times

DANUBE FAB wants to ensure that you are fully informed about your rights and how DANUBE FAB uses your personal information.

We hope this privacy notice will answer any questions you may have, but if not then please contact us at daniela.vasileva@bulatsa.com and alexandru.botoc@romatsa.ro.

2. When do we collect your personal information?

DANUBE FAB may collect personal information from you when;

- You visit our websites
- You engage with us through the use of Social Media or web chat services
- You contact us by any means with queries, complaints or requests
- You comment on a story on our website or social media
- You fill in forms
- You fill in surveys
- You attend an event which DANUBE FAB is hosting or in attendance at.

3. What personal information do we collect?

DANUBE FAB may collect the following types of information;

- Personal information such as full name, date of birth, contact information such as home or work address (dependant on services requested) telephone numbers, email addresses
- Cookie Information such as details of your visits to our websites, any interactions with us through our website, forms or other channels of communication in accordance with our Cookie Policy
- Digital personal information such as your social media username (if you interact with us through this medium which enables us to respond to your comments, questions or feedback)
- Photos or videos if you attend DANUBE FAB sites or attend an event that DANUBE FAB is hosting or in attendance at
- CCTV images if you visit one of our premises
- Information from third parties who support our services

4. Legal basis for collecting and using your personal information

Data Protection Law states that DANUBE FAB is only allowed to collect and process your personal information if it has a lawful reason to do so. DANUBE FAB may collect and use your personal information for the following reasons;

- When you provide your consent
- To provide you with the information or services you request and fulfill a contract with you
- To comply with our legal and regulatory obligations
- To publicise information which is of interest to the public
- When it is in our legitimate interest to do so, such as
 - o To ensure you receive the best possible experience when using our website, products or services
 - o To enable DANUBE FAB to monitor and promote aviation safety

- To monitor, measure or understand the effectiveness of the website in facilitating DANUBE FAB' communications to users such as you, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- For management and audit of our business operations including accounting
- For market research and analysis and developing statistics
- To notify you about changes to the website, our tools and our service
- For direct marketing communications and related profiling to help us to offer you relevant information. We may send marketing to you by SMS, email, phone and social media and digital channels
- Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations
- To write articles, publicise or promote our services through the use of online media, news broadcasters or other reporting channels

5. How DANUBE FAB protects your personal information

Keeping your personal information that you have entrusted with us, safe and secure is of paramount importance to DANUBE FAB. We secure access to our website using a number of secure technologies. We monitor our systems to protect against possible vulnerabilities, attacks and we also carry out independent penetration testing to identify opportunities to strengthen our security infrastructure.

All information you provide to us is stored on our secure servers.

6. How long do we keep your personal information for?

We will only keep your personal information as long as it is necessary for the purpose for which it was collected.

Where you have provided personal information for us to provide a service to you, we will hold onto the personal information you provide to be able to provide the services to you and in some cases for a limited period to meet our legal and regulatory requirements.

Once it is no longer necessary for us to hold your personal information it will be deleted completely or anonymised. An example of this would be to anonymise data so that it is no longer personally identifiable and to use it for purely statistical analysis.

7. Who do we share your personal information with?

We may share your personal information with a small number of selected third parties including:

- The Civil Aviation Authorities (CAA) for regulatory functions and other government bodies and agencies
- Business partners, suppliers and sub-contractors for the performance of a contract, recruitment or to provide services to you
- Legal and other professional advisors

- IT companies and search engine providers who support our website and other business systems
- Police, Courts or other enforcement agencies, in Republic of Bulgaria and/or in Romania or in other European Member States, to meet our legal requirements or upon a valid request to do so. These types of requests will be dealt with on a case by case basis and take the privacy of you as an individual into consideration.

8. Where is your personal information processed?

Sometimes DANUBE FAB may process or store your personal information outside of Republic of Bulgaria and/or of Romania but in the European Economic Area (EEA).

9. Your rights over your personal information

We understand that you trust us with your personal information and we are committed to ensuring you can manage the privacy and security of your personal information yourself. Under Data Protection Laws you have a number of rights:

- Right of access to your personal data
- Right of rectification. If your personal information is incorrect, out of date or incomplete you can request that it is updated
- You have the right to withdraw your consent where consent has been used to collect your personal information. You can unsubscribe from receiving marketing emails from us by clicking the “unsubscribe” link. Once you do this, we will cease to process your personal information for this purpose and you will no longer receive any marketing emails from us
- You have the right to object in cases where we use legitimate interests as a reason to process your personal information. We must then stop using your information unless we believe we have an overriding reason to continue to process your personal information. In that case we would notify you what the reason is
- You have the right to the erasure of your personal information where you withdraw your consent, or it is no longer necessary for us to hold your personal information
- You have the right to request that we restrict the processing of your personal information.

If you decide that you would like a copy of the personal information that we hold on record about you, you can do this at any time. To request your personal information please contact the Data Protection Officers by email at daniela.vasileva@bulatsa.com and at alexandru.botoc@romatsa.ro.

10. Checking your identity

To ensure we send personal information out to the correct person, we will ask you to verify your identity before we proceed with any request. If you have requested a 3rd party to submit a request on your behalf, we will ask them to prove that they have the correct permissions in place before we act.

11. Contacting the Information Commissioners Office and Data Controller

You have the right to be assured that DANUBE FAB will handle your personal information responsibly and in line with best practice and compliance with the General Data Protection Regulation.

If you have a concern about the way DANUBE FAB is handling your personal information, you should alert the DANUBE FAB Data Protection Officers immediately.

If you would wish to contact the National Supervisory Authorities For Personal Data Processing, you must access the following link:

- For Republic of Bulgaria: <https://www.cdpd.bg>, Commission for Personal Data Protection, address Sofia 1592, 2, Prof. Tsvetan Lazarov Blvd.
- For Romania: <https://www.dataprotection.ro>, address 28-30 G-ral Gheorghe Magheru Bld. District 1, post code 010336, Bucharest, Romania.

INFORMATION AND CONTACTS OF THE PERSONAL DATA CONTROLLER

Bulgarian Air Traffic Services Authority (BULATSA)

Headquarters and management address:

1, Brussels Boulevard

Sofia 1540

Telephone: +359 (2) 937 1111

Website: www.bulatsa.com

and

Romanian Air Traffic Services Administration (ROMATSA)

Headquarters and management address:

10, Ion Ionescu de la Brad

Bucharest, 013813

Telephone: +40 21 2083 100

Website: www.romatsa.ro

12. Questions?

This privacy notice sets out how we manage your personal information and the controls around them. So we hope this privacy notice has been helpful.

If you have any questions that haven't been covered or you require a bit more information, then please contact our Data Protection Officers who will be happy to help.

Email us daniela.vasileva@bulatsa.com and at alexandru.botoc@romatsa.ro