



Privacy Policy for the Lufthansa Technik Sofia Facebook page

1 General

This Privacy Policy informs you about the way your personal data is processed on the Lufthansa Technik Sofia Facebook page. The Facebook page can be accessed via the following link:

<https://www.facebook.com/LHTSofia/>

Protecting your personal data is of utmost importance to Lufthansa Technik Sofia Ltd. We use your personal data in accordance with the applicable data protection law, in particular the provisions of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679; GDPR). This Privacy Policy should be read in conjunction with the Facebook Privacy Policy, in particular the Data Policy; further information on the purpose and scope of data processing, your rights, and settings to protect your privacy can be found in the Facebook Data Policy. The Data Policy can be found at:

<https://www.facebook.com/about/privacy/update>

2 Data controller

Lufthansa Technik Sofia Ltd is the controller for data processing under Art. 24 GDPR. Insofar as Lufthansa Technik Sofia Ltd and Facebook are joint controllers in accordance with Art. 26 (1) GDPR, the corresponding agreement shall apply:

https://www.facebook.com/legal/terms/page_controller_addendum



For more information about this agreement, please visit the following link (section “Responsibility for your information used to create Page Insights”):

https://www.facebook.com/legal/terms/information_about_page_insights_data

Contact details:

<p>Lufthansa Technik Sofia Ltd Sofia Airport - Hangar 3 1540 Sofia Bulgaria</p> <p>Contact: gdpr@lht-sofia.com</p> <p>“LTSF”</p>	<p>Facebook Ireland Ltd. 4 Grand Canal Square Dublin 2 Ireland</p> <p>Contact: https://www.facebook.com/help/contact/2061665240770586</p> <p>“Facebook”</p>
jointly "we", "us"	

3 Contact details of the data protection officer

Contact details of the data protection officer:

<p>Group Data Protection Officer for the Lufthansa Group Data Protection Coordinator for Lufthansa Technik Sofia : Email: gdpr@lht-sofia.com</p>	<p>Data Protection Officer of Facebook Ireland Ltd. https://www.facebook.com/help/contact/540977946302970</p>
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4 Scope and nature of data processing

LTSF processes your personal data on the LTSF Facebook page in the following ways:

- When you interact with the LTSF Facebook page, your public profile information (including display name)
- When you interact with the LTSF Facebook page by
 - uploading a post and entering your personal information there
 - entering your personal data via the comment function under Posts
 - contacting LTSF via Messenger and providing your personal data
- When you interact with the LTSF Facebook page, Facebook Insights uses your data to gather statistics on page usage. For more information on the processing of Insights data when interacting with the LTSF Facebook page, please see:

https://www.facebook.com/legal/terms/information_about_page_insights_data

In order to process messages from Facebook users efficiently, these, as well as the master data of the corresponding profile, are also processed outside the LTSF Facebook page in systems for which LTSF is responsible. The data is deleted after 6 months; for data on the LTSF Facebook page, Facebook's deletion rules apply (see Chapter 6).

If you contact us by email or via Facebook Messenger, the communication is unencrypted.

5 Legal basis and purposes

5.1 LTSF

Your personal data is processed based on the following legal basis:

Art. 6 (1) b) GDPR (performance of contract, implementation of pre-contractual measures)

LTFSF processes your personal data in order to fulfil contracts that you have entered into with LTFSF or to carry out pre-contractual measures. You may provide LTFSF with your personal data if

- you have questions about LTFSF services and offers
- you want to complain about a LTFSF service
- you want to receive information about your application to LTFSF or your application status

Your data may be shared internally to process your request.

The amount and category of data processed depends on what you provide to LTFSF. In order to process your request, it may be necessary for LTFSF to request further data from you. In this event, LTFSF will ask you for the additional data and information required to process your request. The following data is generally processed:

- First name
- Surname
- Title / Sex
- Personal information that you send us as part of your request / message

Art. 6 (1) f) GDPR (to safeguard legitimate interests)

LTFSF also processes your personal data in order to safeguard its legitimate interests. The purpose of this processing is as follows:

- To evaluate analyses and statistics relating to user behaviour on the Facebook page
- To optimise the Facebook page in terms of its user-friendliness and attractiveness, and to introduce user-friendly marketing measures
- Other communication and interactions initiated by Facebook users

5.2 Facebook

You can find information on the legal basis for the use of your personal data by Facebook at:

- Facebook Data Policy (section “What is our legal basis for using data?”)
<https://de-de.facebook.com/about/privacy/update>
- Detailed information on the legal bases
https://www.facebook.com/about/privacy/legal_bases

6 Data erasure and retention period

Your personal data is deleted from LTSF's internal systems as soon as it is no longer required for the purposes stated. However, LTSF must sometimes continue to store your data until the end of the retention periods and deadlines set by the legislator or supervisory authorities, which may be derived from the German Commercial Code, the Tax Code or the Money Laundering Act. These are generally six to ten years. LTSF may also retain your data until the statutory limitation periods have expired, if this is necessary for the establishment, exercise or defence of legal claims. After that, the relevant data is routinely erased.

For information about Facebook's data erasure and retention periods, please see:

<https://www.facebook.com/about/privacy/update> (section "Data retention, account deactivation and deletion")

7 Your rights

You can have the following rights under Chapter 3 of the GDPR:

- Right to information, Art. 15 GDPR
- Right to rectification, Art. 16 GDPR
- Right to erasure ("Right to be forgotten"), Art. 17 GDPR
- Right to restrict processing, Art. 18 GDPR
- Right to data portability, Art. 20 GDPR
- Right to object, Art. 21 GDPR

To assert your rights in relation to LTSF, contact gdpr@lht-sofia.com; in relation to Facebook use the following link:

<https://www.facebook.com/help/contact/308592359910928>

You also have the right to lodge a complaint with a supervisory authority. The competent supervisory authorities are:



For **LTSF**:

**Comission for Personal Data
Protection**

2 Prof. Tsvetan Lazarov Blvd, Sofia
1592

Email: kzld@cpdp.bg

For **Facebook**:

Data Protection Commission

Canal House
Station Road
Portarlinton, Co. Laois, R32 AP23
Ireland

Telephone: +353 (0761) 104 800

LoCall 1890 25 22 31

Fax: +353 57 868 4757

Email info@dataprotection.ie