

# BH AIR Privacy and Cookie Policy

This privacy and cookie policy explains how we collect, use, disclose and store personal information. By clicking ok, you accept this policy. You can at any time withdraw your consent [here](#).

## Topics:

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## What personal information do we collect about you?

BH AIR collect, use, disclose and store personal information to provide you with a safe, smooth, efficient and customized travel experience to meet your needs and requirements.

This privacy and cookie policy covers all personal information about you that we collect, use and otherwise process relating to your travel investigations and arrangements with BH AIR, as a customer or potential customer.

We collect personal information about you whenever you use our services (whether services provided directly by us or by other companies or agents acting on our behalf), when you reserve or book tickets through our systems, when you use our websites, or when you use our call centers.

We collect information about you when you use our contact form, register with us or place an order for products or services or subscribe to our newsletter. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage information is collected using cookies.

The types of personal information about you and your travel arrangements that we collect, use, disclose and store are:

- Name

- Address
- Telephone number
- E-mail
- Mr / Miss/ Mrs
- Date of birth
- Passport no/ID no
- Nationality
- Credit information (always anonymized 'xxxx xxxx xxxx 1234')
- IP-addresses

We need your assistance to ensure that your personal data is current, complete and accurate in order to provide correct booking information or flight itinerary to the appropriate customs and immigration authorities as required by law. Please contact us if any updates are necessary.

### **When and why do we collect ‘sensitive personal data’?**

Certain categories of personal information, such as that about race, ethnicity, religion or health, are considered ‘sensitive personal data’.

Generally, we do not ask for sensitive personal data. However, we may occasionally receive this data, because:

- you have requested specific medical assistance from us and/or an airport operator, such as the provision of wheelchair assistance or oxygen, or
- you have otherwise chosen to provide such information to us (or a third party such as the travel agent through which you made your booking)

In addition, you may have made other requests in regard to your travel arrangements that may imply or suggest that you hold particular religious beliefs or have a particular medical condition e.g. if you request a particular type of special meal this may imply or suggest.

By providing any personal information that is, or could be ‘sensitive personal information’ you explicitly give consent that we may collect, use, share with third parties and transfer outside the European Union/EEA this personal information, as described in this privacy and cookie policy. If you request services by phone, you give an oral consent that we may process your personal information in order for us to provide the requested or necessary service/product to you. When ordering online or in person, BH AIR will adopt an ‘opt-in’ policy for obtaining customer consent, in which event, express written consent will be sought from you when collecting your personal information e.g. signing a form or checking a box. Where you make reservations on behalf of another person, you undertake and will ensure that the individual whose personal information is supplied to BH AIR has authorized the disclosure, is informed of and consents to the terms and conditions of this privacy and cookie policy.

**If you withdraw your consent, it may mean we will not be able to provide all or parts of the services you have requested from us. The withdrawal of consent shall not affect the**

**lawfulness of processing based on consent before its withdrawal. Please be aware that in these circumstances you will not be able to cancel or obtain a refund of any fees you have paid.**

**You may at any time withdraw your consent by contacting: [bhair@bhairlines.com](mailto:bhair@bhairlines.com)**

## **Minors**

BH AIR cannot distinguish the age of persons who access and use our websites. If a minor (according to applicable laws) has provided us with personal information without parental or guardian consent, the parent or guardian **should contact us** to remove the relevant personal information and unsubscribe the minor.

## **How will we use the information about you?**

Generally, BH AIR collects personal information, either directly from you or from your authorized representatives (i.e. persons whom you have authorized), from third parties (e.g., your travel agent or our service provider), and other channels including our ticketing counters and airport operations, in order to fulfil the following purposes, which include but are not limited to:

- Providing services to you such as processing a transaction (e.g., making a booking), providing technical assistance, assisting you in the transaction, providing flight alert messages, facilitating internet check-in and self-check-in, providing personalized services and responding to your enquiries or requests,
- Providing airport services such as processing information relating to connecting flights, arrangements at airports, and customs and immigration facilities,
- Providing baggage related services such as processing of any baggage related queries, including mishandled or missing baggage claims,
- Providing in-flight catering and other services that best meet your preferences and needs (which we may collect during our interactions with you),
- Marketing and communicating with you in relation to products and services offered by BH AIR or appointed agents,
- Contacting you for product or customer satisfaction surveys,
- Research and analytics purposes, including market research; and
- Safety, security and legal compliance.

The personal information is further used to provide information, news, and other business-related activities in your service.

## **What is the legal basis for collecting personal information?**

The handling of personal information is in accordance with EU General Data Protection Regulation (GDPR) as stated in REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL and applicable national law.

We only collect necessary information to provide you with the services you request from us, to perform according to a contract or prepare for doing so, to pursue legitimate interests or requirements needed according to law. If we don't get access to your information we may not be able to provide you with our services.

### **Who will receive personal information about you?**

Transfer of your personal information will only be for specific purposes to provide a seamless customer experience. In order to facilitate your travel arrangements, we will often need to share your personal information to and with our subsidiaries and affiliated companies as well as third parties including other airlines and airport operators, security personnel and travel agents involved in making your travel arrangements. We also share your personal information with third parties needed to deliver services you have requested from us, such as companies that provide airport assistance or transfers.

BH AIR may also disclose your personal information to law enforcement agencies and government for security, customs and immigration purposes. For example, airlines are required by laws in the United States of America and other countries to provide border control agencies with access to your booking information or flight itinerary. Accordingly, relevant personal information (known as Passenger Name Record (PNR) or Advance Passenger Information (API)) may be disclosed to the appropriate customs, immigration, and/or any other relevant authorities as required by law. Please be informed that the initial recipients of such information may share your PNR and API data with other government agencies or enforcement authorities.

Your information may be transferred outside the European Union/EEA subject to the rules described in this privacy and cookie policy. In some cases, you may have to give us consent and you should be aware that the security in such cases may not be the same as in your country of origin. The transfer will be in accordance with the EU General Data Protection Regulation (GDPR).

BH AIR may also use and disclose your personal data to persons who have been validly identified as being you or your authorized representative(s) for the purpose of the relevant transaction or enquiry. In particular, each of the passengers who are grouped under the same Passenger Name Record (PNR) number shall be deemed to be authorized representatives of each of the other passengers under the same PNR number, for the purposes of disclosure identified in this policy, regardless of the number of persons within each group.

We share your personal information with World Ticket and other technical service providers, who are providing and hosting our ticket system. The hosting is provided Soft layer (Europe/USA/China)Ltadel(Denmark).

### **How long will we keep your personal information?**

We only keep your personal data as long as it is necessary to fulfil the purpose for which it was collected e.g. to fulfill the obligations to deliver your travel services, the legal or business purposes of BH AIR, or as required by relevant laws. We will as a general rule, delete data after 5 years, unless there are specific reasons for keeping them for a longer period.

Personal data in connection with surveys, competitions etc. will be deleted within 1 month after the result has been announced.

## **What are your rights?**

You have the following rights regarding your personal data:

- Access to your data
- Have incorrect data corrected
- Have your data deleted
- Withdraw a consent
- Have your data transferred to you in an accessible format.
- Right to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated. While such a request is processed we are restricted in the use your personal information.

There may be restrictions or limitations to these rights which will be considered in the specific circumstances.

Please contact us if you want to use any of your rights. In certain cases, BH AIR reserves the right to charge a reasonable administrative fee for this service according to applicable laws.

Please also see our cookie policy.

## **Security safeguards**

BH AIR has implemented appropriate technical as well as organizational measures in order to safeguard the processing of your personal data. We have e.g. safeguards against loss or theft as well as unauthorized access and undue disclosure of personal data.

Examples of technical safeguards include encryption, 'firewalls' and Secure Socket Layer (SSL). See further details of these technical safeguards for personal data collected through our website here.

As an example of a procedural safeguard, BH AIR has implemented various authentication procedures internally and with our external service providers that may involve us requesting various personal particulars from you in order to verify your identity before we process your request for a particular service, product or transaction. BH AIR also monitor network traffic with a view to identifying unauthorized attempts to upload or change personal information, perpetuate fraudulent or illegal activities or otherwise cause damage.

If you have any concerns about security, you should contact us.

## **Marketing**

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out later. You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the BH AIR family of corporations. If you no longer wish to be contacted for marketing purposes, please [click here](#).

We don't transfer or sell your personal information to any other third parties.

## **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

The first time you land on our website you will see a box with information on cookies. If you don't accept cookies, there will be no cookies for statistics, but there will be a cookie remembering this choice. If you don't want our website to leave any cookies at all, you will have to turn cookies off in your browser. It will then also not be possible to use any other features that requires that the website remembers your choices.

## **Other websites**

Our website contains links to other websites. This privacy and cookie policy only applies to this website so when you link to other websites you should read their privacy and cookie policies.

## **Changes to our privacy and cookie policy**

We keep our privacy and cookie policy under regular review and we will place any updates on this webpage. This privacy and cookie policy was last updated on 18 May 2018.

## **How to contact us**

BH AIR is the data controller and you should at any time feel free to contact us if you have any questions about our privacy and cookie policy or information we hold about you:

**bhair@bgairlines.com**

**Att: Personnel data protection Team**

**BH AIR -BGH-8H**

**7 Diakon Ignatii str**

**Bulgaria**

**BG130540291**

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Bulgarian Data Protection Agency:

<https://www.cdpd.bg/en>