

Privacy Policy

Last updated: [09 / 09 / 2025]

This Privacy Policy explains how **Cloverfield LTD** (“**Cloverfield**”, “**we**”, “**us**”, “**our**”) collects and processes personal data when you use [**thraceaerialtech.com**] (the “**Site**”) and when you contact us about counter-drone services and technology.

If you do not agree with this Policy, please do not use the Site or submit personal data.

1) Who we are (Controller)

Cloverfield LTD

[Sv.Sv. Kirill I Methodii 61a], Sofia, Bulgaria

Email: office@thraceaerialtech.com · Tel: +359 878 807 525

If appointed, our Data Protection Officer (DPO) can be reached at:

office@thraceaerialtech.com.

2) What data we collect

2.1 Data you provide via forms

- **Identity & contact:** first/last name, company/organization, work email, phone.
- **Context of request:** selected service/use case (dropdown), free-text message, site location/timezone, **attachments** (e.g., site maps, photos, RFPs).
- **Routing & analytics:** hidden fields we may capture from URLs (e.g., source, intent, stack, sector, utm_*).
Please **do not submit** classified, export-controlled, or otherwise restricted information through public forms.

2.2 Browsing data & cookies

- Technical identifiers (IP address, device/browser data), pages viewed, timestamps, referral/UTM data.
- Cookies/SDKs used for: site security, load balancing, basic analytics, and—if you consent—performance/marketing. See **Section 8** (Cookies) and the Cookie Banner for choices.

2.3 Business communications

- Emails, call notes, proposals, contracts, purchase records, support tickets.

3) Purposes & legal bases (GDPR Art. 6)

We process your data to:

- **Respond to inquiries and provide proposals** (Art. 6(1)(b) contract or steps prior to contract; Art. 6(1)(f) legitimate interests for B2B evaluation).

- **Schedule assessments, deployments, and support** (Art. 6(1)(b)).
- **Operate and secure the Site** (security logs, fraud prevention) (Art. 6(1)(f)).
- **Analytics and service improvement** (Art. 6(1)(f)) and, where required, **with your consent** (Art. 6(1)(a)).
- **Marketing communications** (only with your **consent**, Art. 6(1)(a); you can withdraw at any time).
- **Legal compliance** (tax, accounting, export controls) (Art. 6(1)(c)).

We **do not** intentionally collect special categories of data (Art. 9 GDPR). Please do not include such data in your submissions.

4) Who receives your data

We share data only as needed with:

- **Hosting & web platform providers** (e.g., website/CMS, CDN).
- **Form handling, email & CRM** tools used to manage leads and replies.
- **Analytics & error monitoring** services.
- **Professional advisors** (legal/accounting) where necessary.
- **Authorities or counterparties** when legally required (e.g., export controls, court orders). All processors are bound by contracts consistent with GDPR (Art. 28).

5) International transfers

Some providers may be outside the EEA/UK. When transferring data internationally, we use appropriate safeguards such as **Standard Contractual Clauses (SCCs)** and additional measures where required. You may request a copy of relevant safeguards via office@thraceaerialtech.com.

6) Retention

We keep data only as long as necessary for the purposes above, then delete or anonymize it:

- **Contact/lead data:** typically **24 months** after last interaction (unless it becomes part of a contract record).
- **Contract, invoicing & compliance records:** per statutory limits (usually **5–10 years**).
- **Security & server logs:** **6–12 months**.
- **Cookie/analytics data:** per cookie lifespan (see Cookie Banner).

We may retain data longer if required to establish, exercise, or defend legal claims.

7) Your rights (GDPR)

You have the right to **access, rectify, erase, restrict, object**, and **port** your personal data, and to **withdraw consent** at any time (without affecting prior processing).

To exercise these rights, email office@thraceaerialtech.com.

You also have the right to lodge a complaint with your supervisory authority. In Bulgaria this is the **Commission for Personal Data Protection (CPDP)**. See their website for contact details and procedures.

8) Cookies & similar technologies

We use cookies/SDKs to run and improve the Site.

Categories

- **Strictly necessary** (always active): security, load balancing, basic settings.
- **Performance/analytics** (consent-based): aggregated usage metrics.
- **Functional** (consent-based): remembering preferences.
- **Marketing** (consent-based, if used): measuring campaigns.

Use the **Cookie Banner** to accept/reject non-essential cookies or to change your choices at any time. You can also manage cookies in your browser settings.

9) Security

We apply organizational and technical measures appropriate to the risk, including encrypted transport (TLS), restricted access on a need-to-know basis, MFA for admin accounts, and regular updates/monitoring. No internet transmission is 100% secure; please submit only the data necessary for your request.

10) Children

The Site is directed to professional users. We do not knowingly collect data from children under the age of 16. If you believe a child has provided us data, contact us to delete it.

11) Do not send restricted data

For security and legal reasons, **do not** submit classified information, state secrets, or export-controlled technical data through public forms. If such data is essential for an engagement, we will arrange **contractual safeguards and secure channels** first.

12) Third-party links & embeds

The Site may include links or embeds (e.g., maps, videos). Third-party content is governed by their own policies. We are not responsible for their practices.

13) Changes to this Policy

We may update this Policy from time to time. The “Last updated” date shows the latest version. Material changes will be highlighted on the Site. Continued use after changes means you accept the updated Policy.

14) Contact

Questions about this Policy or your data?

Email office@thraceaerialtech.com or write to **Cloverfield LTD, [Sv.Sv. Kirill I Methodii 61a], Sofia, Bulgaria.**

Notes specific to counter-UAS services

- Mentions of **jamming** or **interception** are illustrative; any operational use occurs **only where permitted by law** and under proper authorization.
- Export controls and sanctions may restrict access to certain materials; we will verify eligibility during onboarding.