

“BDZ – PASSENGER TRANSPORT” EOOD

CENTRAL ADMINISTRATION

3 “Ivan Vazov” Street, Sofia 1080, Bulgaria · tel.: (+359 2) 987 88 69
bdz_passengers@bdz.bg · www.bdz.bg

APPROVED: *[signature and company seal affixed]*

ENG. KIRIL KOSTADINOV

MANAGING DIRECTOR OF “BDZ – PASSENGER TRANSPORT” EOOD

Date: 26.08.2026 *[handwritten]*

POLICY

**on privacy and the protection of personal data
at “BDZ – Passenger Transport” EOOD**

**Sofia
August 2026**

TRANSLATOR'S NOTE

This is a translation from Bulgarian into English of the document “ПОЛИТИКА за поверителност и защита на личните данни в „БДЖ – Пътнически превози“ ЕООД”, version 4.0 of 25.08.2026. The translation is complete and follows the source closely; original section numbering, article references and contact details are preserved. Handwritten entries, signatures and seals are described in square brackets. This translation is not a certified (sworn) translation.

„БДЖ – Пътнически превози“ ЕООД	“BDZ – Passenger Transport” EOOD (Bulgarian State Railways; EOOD = single-member limited liability company)
ЕИК	UIC — Unified Identification Code (company registration number)
Администратор на лични данни	Data controller
Длъжностно лице по защита на данните	Data Protection Officer (DPO)
Комисия за защита на личните данни (КЗЛД)	Commission for Personal Data Protection (CPDP) — the Bulgarian supervisory authority
ЗЗЛД	Personal Data Protection Act (Bulgarian national law)
Регламент (ЕС) 2016/679	Regulation (EU) 2016/679 (GDPR)
ЕГН / ЛНЧ	EGN (Bulgarian Personal Identification Number) / LNCh (Personal Number of a Foreigner)
чл. 6, ал. 1, т. „Б“ / „В“ / „Е“	Art. 6(1)(b) / (c) / (f) — the Bulgarian letters Б, В, Д, Е correspond to the Latin letters b, c, e, f of the Regulation

1. Information about us

“BDZ – Passenger Transport” EOOD is a commercial company registered in the Commercial Register at the Registry Agency under UIC 175405647, with its registered seat and address of management at: Sofia, 3 “Ivan Vazov” Street.

“BDZ – Passenger Transport” EOOD is a controller of personal data within the meaning of the Personal Data Protection Act and Regulation (EU) 2016/679.

2. Contact information regarding the protection of personal data

Data Protection Officer at “BDZ – Passenger Transport” EOOD:

- tel: +359 887 245 158
- E-mail: dpo_pp@bdz.bg

Commission for Personal Data Protection

- Registered seat and address of management:
Sofia 1592, 2 “Prof. Tsvetan Lazarov” Blvd.
- Correspondence details:
Sofia 1592, 2 “Prof. Tsvetan Lazarov” Blvd.
- Telephone: +3359 2 915 35 18 [as printed in the original; the correct country code is +359]
- E-mail addresses: kzld@government.bg, kzld@cpdp.bg

Address for correspondence with “BDZ – Passenger Transport” EOOD

- Postal address:
Sofia 1080, 3 “Ivan Vazov” Street
- E-mail address: bdz_passengers@bdz.bg

3. Our fundamental commitment when handling personal data

“BDZ – PASSENGER TRANSPORT” EOOD respects the confidentiality of your personal data.

The security of the data you have entrusted to us is very important to us. It is of great significance for the success of our business and for our public image. That is why we protect your data by applying all appropriate technical and organisational means at our disposal, in order to prevent unauthorised access, unauthorised or malicious use, loss or premature erasure of information.

We collect and process personal data only in compliance with the requirements of local and European legislation. We are aware that the processing of your data is linked to a specific reason and cannot be carried out without limitation.

The purpose of this “Privacy and Personal Data Protection Policy” is to explain to you, in clear and accessible language, how and why we process your personal data.

By this “Privacy and Personal Data Protection Policy”, “BDZ – PASSENGER TRANSPORT” EOOD declares that it applies all technical and organisational measures for the protection of the personal data of natural persons which are prescribed by law or by another normative act at national and European level.

4. Definition of personal data

Personal data within the meaning of the Personal Data Protection Act is any information relating to a natural person who is identified or who can be identified, directly or indirectly, by means of an identification number or by one or more specific characteristics.

Thus, for example, your mobile telephone number constitutes indirect identification. By that alone we would find it difficult to identify you, and therefore an additional identifier such as a name, an address or further enquiries would be required.

Direct identification is achieved where you provide a unique identifier such as an EGN, an LNCh, a customer code, etc.

5. What data we process

In order to provide you with effective access to our products/services, **“BDZ – PASSENGER TRANSPORT” EOOD** collects the following information about you:

- identification data — when visiting the website, when you register on it or complete the form for opinions and/or comments, and also when subscribing to our newsletter:
 - names;
 - telephone number;
 - e-mail;
 - organisation;
 - town/city;
 - address;
 - bank account.
- data on payments made:
 - date of issue of the credit/debit card;
 - last 4 digits of the card;
 - transaction date.
- data from the video surveillance system — when travelling in the zones covered by the cameras of the video surveillance systems installed in the saloons of passenger carriages and in the corridors of sleeping and couchette carriages.

6. Why we process your personal data

We process your personal data:

- in order to perform our contractual and pre-contractual obligations in connection with the sale of transport documents, and with reports and complaints;

Pre-contractual relations include: making offers, exchanging correspondence concerning the services of **“BDZ – PASSENGER TRANSPORT” EOOD**, clarification of services, etc.

The contractual ground arises upon purchase of a transport document or ordering of a transport service and the performance of all actions necessary for this (a contract concluded with you).

The processing is carried out for the purpose of:

- establishing the identity of the customer;
 - managing and performing your requests for services, performing service contracts;
 - preparing an offer for the conclusion of a contract;
 - preparing and sending an invoice/bill for the services you use with us;
 - ensuring the complete service you require, as well as collecting the amounts due for the services used;
 - notification of everything connected with the services you use with us, sending various notices, notification of problems or errors, or responding to requests, complaints and proposals submitted by you;
 - analysis of customer history and preparation of a user profile with a view to determining a suitable offer for you;
 - establishing and/or preventing unlawful acts or acts contrary to our terms and conditions for the respective services;
 - the data from your invoices is processed by us for purposes compatible with the original purpose of its collection, with a view to preparing an overall view of our services;
- for the performance of statutory obligations;

The processing is carried out for the purpose of:

- providing information to the Consumer Protection Commission or to third parties provided for in the Consumer Protection Act;

- providing information to the Commission for Personal Data Protection in connection with obligations provided for in the legal framework for the protection of personal data — the Personal Data Protection Act, Regulation (EU) 2016/679 of 27 April 2016, etc.;
 - obligations provided for in the Accountancy Act and the Tax and Social Insurance Procedure Code and other related normative acts, in connection with the keeping of correct and lawful accounts;
 - providing information to the court and to third parties in the framework of court proceedings, in accordance with the requirements of the procedural and substantive normative acts applicable to the proceedings;
 - in order to fulfil our obligations to provide transport in crises of a non-military character, under a “State of Martial Law” regime, a “State of War” regime, or in another state of emergency;
- in order to protect the vital interests of the data subject or of another natural person:

The processing is carried out for the purpose of:

- limiting acts of vandalism, and preventing, deterring and investigating unlawful acts which may endanger or harm the life and/or health of passengers;
 - increasing passenger safety;
 - ensuring a timely response in the event of incidents and where intervention by the law-enforcement authorities is required;
 - limiting the number of irregular/unticketed journeys;
 - monitoring the passenger load on a given route line — through analysis and processing of the data for statistical purposes.
- use of personal data following consent;

Consent to the processing of your personal data is given upon registration on our website or upon completion of a contact form placed on our site. Consent is a ground for the processing of personal data and the purpose is stated in it. For example, for marketing purposes and for receiving advertising newsletters.

The consent given may be withdrawn at any time by sending a written request to the addresses indicated above, and this does not affect the performance of our contractual obligations, if any. Upon withdrawal of consent to the processing of personal data on some or all grounds, **“BDZ – PASSENGER TRANSPORT” EOOD** will terminate the processing of the personal data for the purposes stated in it.

The withdrawal of consent does not affect the lawfulness of processing based on consent given before its withdrawal. Withdrawal of consent given is effected in the manner indicated in it, or by using our contact details.

- where there is a legal (legitimate) interest, except where such interests are overridden by the interests of the natural person to whom the data relates;
- other cases indicated in a normative act which empower or oblige the controller to carry out processing.

7. For what purposes do we collect your personal data?

The personal data received from you will be used so that we can fulfil our obligations towards you, as well as to assist in the exercise of your rights, including but not limited to:

- to provide you with the services/products offered by **“BDZ – PASSENGER TRANSPORT” EOOD**;
- to provide you with access to our website, for which purpose we show you content that is relevant, personalised and limited in accordance with the criteria you have set;
- to respond to your enquiries, opinions and recommendations;
- to send you information related to special campaigns and our new products and services;
- we have a legal interest in collecting your personal data, because without it we cannot provide you with the service/product in which you are interested;
- to increase the satisfaction of the Company’s customers from the use of rail transport by providing quality, safe and comfortable carriage.

8. In what manner is your personal data collected?

In order to provide products and services, **“BDZ – PASSENGER TRANSPORT” EOOD** processes (collects) the personal data provided by you in the following ways:

- by your completion of registration forms on our online platforms;
- by completion of forms and declarations which are provided to you by Dealers who have concluded contracts with **“BDZ – PASSENGER TRANSPORT” EOOD**. The forms are provided and completed in free form, provided to you on paper or in electronic form;
- through visits to the web portal for use of the services of our online shop;
- upon updating of data at your request and completion of an update form on paper or in an electronic environment;

- through processing of information about your visits to the web portals of **“BDZ – PASSENGER TRANSPORT” EOOD**;
- through the cameras of the video surveillance systems.

(the types of personal data we collect are indicated above)

9. When we erase your data

Depending on the ground and the manner of processing of your personal data, the retention period of the personal data varies. Guided by our wish to minimise the processing of personal data and to shorten the retention periods, we do not retain any data submitted by you electronically for more than 3 months after the fulfilment of your order.

Our accounting department retains data from waybills and other documents evidencing the performance of your orders which contain personal data, for a period of 6 years from the lapse of our contractual ground. Upon expiry of that period, and in the event that no legal ground exists for continued retention of your personal data, the information about you is destroyed. The records of your orders are permanently deleted from our system upon the lapse of 3 months from the placing of the order by you. Paper media containing your personal data are destroyed upon expiry of the statutory periods.

The recordings from the cameras of the video surveillance systems are retained for 60 days, after which they are automatically deleted. Recordings are retained beyond the period indicated above in cases where this is necessary for the purposes of investigating crimes or infringements, or where another lawfully justified reason for their retention exists.

10. To whom may we transfer your personal data?

“BDZ – PASSENGER TRANSPORT” EOOD undertakes not to provide your personal data to third parties without your express consent, except where this is necessary for the performance of contractual obligations undertaken towards you.

For the performance of obligations undertaken under contractual and/or pre-contractual relations arising with you, **“BDZ – PASSENGER TRANSPORT” EOOD** may disclose your personal data to the following persons:

- Companies providing courier services;
- The company which provides hosting services related to this website.
- The companies related to **“BDZ – PASSENGER TRANSPORT” EOOD** located on the territory of the Republic of Bulgaria, insofar as there exists a legitimate interest connected with the processing of your personal data for internal administrative purposes. This and any other transfer is carried out in strict compliance with the confidentiality and security of your personal data.
- At the request of the natural person who provided the personal data;
- At the request of the competent authorities in accordance with the legislation in force of the Republic of Bulgaria and of the European Union;

IMPORTANT! **“BDZ – PASSENGER TRANSPORT” EOOD** does not carry out disclosure or transfer of personal data obtained from the video surveillance systems to third countries or international organisations, except in cases provided for by law.

In all the cases indicated above, the persons to whom we provide your personal data have declared that they provide an adequate level of protection of your personal data, including foreign companies located within the EU and the EEA. With regard to companies located outside the EU and the EEA, in each specific case the respective company guarantees that it provides an adequate level of protection of personal data, complying with the requirements of European legislation.

* * *

***This privacy and personal data protection policy was approved by
the Management of “BDZ – PASSENGER TRANSPORT” EOOD,
it repeals version 3.0
and is in force as of 01 September 2026.***