

“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. VENTSISLAV SLAVKOV

MANAGING DIRECTOR OF “BDZ – PASSENGER TRANSPORT” EOOD

DATE: 10.02.2025 *[handwritten]*

NOTICE

**ON THE CONFIDENTIALITY OF PERSONAL DATA
UPON ACCESS TO THE BUILDINGS AND SITES
OF “BDZ – PASSENGER TRANSPORT” EOOD**

Sofia, February 2025

TRANSLATOR'S NOTE

This is a translation from Bulgarian into English of “СЪОБЩЕНИЕ за поверителност на личните данни при достъп до сградите и обектите на „БДЖ-Пътнически превози“ ЕООД” (Sofia, February 2025).

Note on completeness: the scanned source file contains the cover page followed by the pages internally numbered 3/8 through 8/8. **The page internally numbered 2/8 is not present in the scan supplied**, and its content is therefore not included in this translation. Everything present in the scan has been translated in full.

пропускателен режим	access control regime (the system of passes and entry control at the company's premises)
ЕИК по БУЛСТАТ	UIC under BULSTAT — Unified Identification Code in the Bulgarian company/entity register
ЕГН / ЛЧН	EGN (Bulgarian Personal Identification Number) / LChN (Personal Number of a Foreigner; printed “ЛЧН” in the source, elsewhere “ЛНЧ”)
чл. 6, т 1, буква „в“	Art. 6(1)(c) — the Bulgarian letter „в“ corresponds to the Latin letter (c) of the Regulation
Поделения за пътнически превози	Passenger Transport Divisions (the company's regional divisions)
„Холдинг – БДЖ“ ЕАД / „БДЖ – Товарни превози“ ЕООД	“Holding BDZ” EAD (single-member joint-stock company) / “BDZ – Freight Transport” EOOD

Details of the controller and contact details

“**BDZ – Passenger Transport**” EOOD, UIC under BULSTAT 175405647, with contact details: Sofia 1080, 3 “Ivan Vazov” Street, tel. +359 2 987 8869; fax: +359 2 890 7188; e-mail: bdz_passengers@bdz.bg; web site: www.bdz.bg, is the controller of the personal data of the persons which it processes for the purpose of providing access to the buildings and sites used by “**BDZ – Passenger Transport**” EOOD, situated in Sofia, 3 “Ivan Vazov” Street, as well as all other buildings and sites used by the company and its Passenger Transport Divisions — Sofia, Plovdiv and Gorna Oryahovitsa.

Contact details of the Data Protection Officer

On all matters relating to the processing of your personal data and to the exercise of rights, you may address the Data Protection Officer designated by “**BDZ – Passenger Transport**” EOOD, at your choice, using any of the following contact details: telephone: +359 887 245 158, e-mail address for correspondence: dpo_pp@bdz.bg.

In order to exercise your rights relating to this processing of data, you may submit a request in any of the following ways:

- send a request for the exercise of rights on paper to the address: Sofia 1080, 3 “Ivan Vazov” Street, “BDZ – Passenger Transport” EOOD, “General Administration” Department, registry office;
- submit a request for the exercise of rights in person at the address: Sofia 1080, 3 “Ivan Vazov” Street, “BDZ – Passenger Transport” EOOD, “General Administration” Department, registry office;
- send a request for the exercise of rights to the following e-mail address: bdz_passengers@bdz.bg or dpo_pp@bdz.bg.

As a personal data controller, “BDZ – Passenger Transport” EOOD applies the principles for the processing of personal data and, by means of this Privacy Notice, provides information and the conditions for the exercise of the rights of data subjects in accordance with Art. 13 and Art. 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as the General Regulation.

Scope of the privacy notice

The Notice on the confidentiality of personal data upon the provision of access to the buildings of “BDZ – Passenger Transport” EOOD (referred to in short as the “Privacy Notice”) applies to all information containing personal data which is stored or processed in connection with the implementation of the access control regime in the buildings of “BDZ – Passenger Transport” EOOD. The information may be contained both in paper documents and in electronic documents, irrespective of whether they are signed with a qualified electronic signature or not.

Important! With regard to the building at 3 “Ivan Vazov” Street, “BDZ – Passenger Transport” EOOD, as a personal data controller, processes personal data of natural persons and of other personal data controllers which jointly use the building stock: “Holding BDZ” EAD and “BDZ – Freight Transport” EOOD.

The Privacy Notice may be updated periodically. Upon updating, its addressees will be notified in due course.

Purpose of the privacy notice

The exercise of control by natural persons over their personal data is possible only where they are informed how their personal information is collected, stored, used or otherwise processed. By means of this document, the persons who are given access to the buildings of “BDZ – Passenger Transport” EOOD are provided with information about the processing of their personal data which is carried out and about the possibilities available to them for exercising control over that processing, in accordance with the requirements of European and national personal data protection legislation.

Addressees of the privacy notice (for whom it is intended)

This Privacy Notice is intended for all persons whose personal data is processed in connection with the implementation of the access control regime in the buildings of “BDZ – Passenger Transport” EOOD.

According to the type of access granted to them, such persons may be:

- persons with permanent access;
- persons with temporary access;
- persons with one-off access;
- persons taking part in organised visits and events.

Categories of personal data

The categories of personal data which are processed in connection with the access control regime at “BDZ – Passenger Transport” EOOD depend on the type of pass which the person receives, as follows:

- the data from the machine-readable zone of a card / chip (via the access control system), which is:
 - given name and family name;
 - position;
 - personal data controller;
 - photograph.
- for persons who are granted one-off access to the buildings and sites of “BDZ – Passenger Transport” EOOD, the personal data is recorded in the visitors' book of the respective building/site and is:
 - given name and family name;
 - the first 6 digits of the EGN.
- for persons who are Bulgarian nationals taking part in organised visits or in the holding of events at the controller's sites, the data is:
 - for the organiser of the visit:
 - the three names;
 - the first 6 digits of the EGN;
 - contact telephone.
 - for the participants in the visit:
 - given name and family name;
 - the first 6 digits of the EGN.
- for persons who are foreign nationals taking part in organised visits or in the holding of events in buildings or sites of “BDZ – Passenger Transport” EOOD, the following personal data is processed:
 - for the organiser of the visit:
 - the three names;
 - the first 6 digits of the EGN;
 - contact telephone.
 - for the participants in the visit:
 - given name and family name;
 - the first 6 digits of the LChN;

IMPORTANT! The provision of the personal data in the categories and to the extent indicated is mandatory. Failure to provide the data results in the impossibility of meeting the requirements for administering the access control regime in accordance with the security measures adopted, as a consequence of which access to the buildings and sites of “BDZ – Passenger Transport” EOOD is not granted.

Legal ground for the processing of the personal data

The ground for the processing of the data which is obtained and created in the implementation of the access control regime is compliance with a legal obligation to which the personal data controller is subject, pursuant to Art. 6(1)(c) of the General Data Protection Regulation.

Purposes for which the data is processed

“BDZ – Passenger Transport” EOOD processes the personal data of the persons who visit its buildings in order to achieve the following purposes:

- guaranteeing the life, health and safety of all persons who are on the controller's premises and sites, by not permitting unrestricted access to them;
- ensuring the traceability of visitors, by retaining data on their identity;
- ensuring the normal functioning of the personal data controller and of the other controllers with which the buildings and sites are jointly used, by preventing incidents which could arise in the event of uncontrolled and free access.

Important! “BDZ – Passenger Transport” EOOD processes the personal data only for the purpose for which it was collected, and does not re-use it for incompatible purposes.

Sources of personal data

The personal data which is processed upon the issuance of a pass, irrespective of the type of access, is provided by the natural person themselves or by the initiator of the issuance of the pass (an official of the controller, or the organiser of the visit or event).

The personal data may also be obtained from natural and legal persons which have a contract with “BDZ – Passenger Transport” EOOD (in respect of their workers and employees who require access to the buildings in connection with the performance of a contract).

Retention of the personal data

“BDZ – Passenger Transport” EOOD retains the personal data only for as long as is necessary in order to achieve the purposes for which it was collected, including having regard to the applicable statutory period. All personal data obtained in connection with one-off passes is retained for a period of up to 1 year after the last entry in the visitors' book. The data obtained in connection with the issuance of all remaining passes, including the data on organised visits and events held, is retained for a period of 1 year from the date of the visit (where entry is by lists) or from the date of the last entry in the visitors' book.

Disclosure and transfer of personal data

For the purposes listed above, “BDZ – Passenger Transport” EOOD, where necessary, discloses the personal data obtained in the provision and implementation of the access control regime to judicial authorities and to the security and public order services.

No transfer of the personal data to third countries or to international organisations is carried out.

Automated decision-making and profiling

“BDZ – Passenger Transport” EOOD does not use the data obtained in the implementation of the access control regime for automated decision-making by means of computer algorithms replacing human judgment, including by carrying out profiling.

Security of the personal data

“BDZ – Passenger Transport” EOOD takes reasonable physical, technical and organisational security measures designed to protect all personal data against loss, misuse, alteration, destruction or damage, in accordance with the requirements of European and national legislation.

Rights of data subjects

In the processing of personal data in connection with the implementation of the access control regime, “BDZ – Passenger Transport” EOOD applies in good faith the statutory rules for the exercise of the rights of data subjects. With regard to the personal data processing operations carried out, natural persons have the opportunity to exercise the following rights of theirs:

- **right to information** about the processing of the personal data of individuals by the controller;
- **access to the personal data** which is processed by the controller;
- **right to rectification**, where the personal data is incomplete or inaccurate;
- **right to erasure** /“right to be forgotten”/, which is applicable only in the following cases: the personal data is no longer necessary for the purposes for which it was processed; the personal data has been processed unlawfully or on a legal ground which has lapsed; erasure is necessary for compliance with a legal obligation under Union law or the law of a Member State to which the controller is subject; consent has been withdrawn; and others;
- **right to restriction of the processing of the personal data** to storage only, where: the accuracy of the personal data is contested; the processing is unlawful but the data subject opposes the erasure of the personal data; or for the establishment, exercise or defence of legal claims;
- **right to object to the processing** at any time and on grounds relating to the particular situation of the individual, in cases where there are no legal grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

For the exercise of these rights, with the exception of the right to lodge a complaint, it is necessary to contact the Data Protection Officer by one of the means of contact indicated above.

In your request for the exercise of rights you should state your three names and address for the purpose of identifying you as a data

subject, and where necessary the administration of “BDZ – Passenger Transport” EOOD may request additional data as well as evidence of identity. State what your request consists of. State the address for correspondence with you (physical address, e-mail address) in accordance with your preferred form of communication.

A reply will be provided in compliance with the applicable time limits — within one calendar month of receipt of the request, whereby the period may be extended by a further two months, taking into account the complexity and the number of requests. In the event of an extension of the period, the data subject is notified and the reasons necessitating the extension are stated. The first provision of data is free of charge.

Right to lodge a complaint with the Commission for Personal Data Protection or with the court

If you consider that the processing of personal data in connection with the implementation of the access control regime in the buildings of “BDZ – Passenger Transport” EOOD is unlawful or infringes your rights, you may lodge a complaint with the Commission for Personal Data Protection at the address: Sofia 1592, 2 “Prof. Tsvetan Lazarov” Blvd., electronic address: <https://www.cdpd.bg>, or with the Administrative Court — Sofia City.

Miscellaneous

This Privacy Notice enters into force as of the date of its approval, mentioned on the title page, by the Managing Director of “BDZ – Passenger Transport” EOOD.

Updating of this Privacy Notice is carried out by the personal data controller “BDZ – Passenger Transport” EOOD by means of a review at least once a year, and also at any time — where a need arises, upon amendments to Regulation (EU) 2016/679 or to the Personal Data Protection Act — by means of amendment and/or supplementation, following the procedure for its approval.

The “Security” Department familiarises all officials in the department engaged in the activities of processing personal data in connection with the implementation of the access control regime in the buildings and sites of “BDZ – Passenger Transport” EOOD.

The current version of this Privacy Notice is published and maintained on the website of the controller “BDZ – Passenger Transport” EOOD in the section “Personal Data Protection”.