

“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: 18.08.26 *[handwritten]*

[Handwritten annotation: “Eng. An. Atanasov, Order No. 01-16-2951/13.08.26”]

Notice

**UNDER ART. 13 OF THE GDPR CONCERNING THE VIDEO SURVEILLANCE
OF THE CLIENTS OF “BDZ – PASSENGER TRANSPORT” EOOD**

Sofia, August 2026

TRANSLATOR'S NOTE

This is a translation from Bulgarian into English of “Уведомление по чл.13 от ОРЗЛД относно видеонаблюдението на клиентите на „БДЖ – Пътнически превози“ ЕООД” (Sofia, August 2026; in force as of 01.09.2026). 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.

ОРЗЛД	GDPR — General Data Protection Regulation, Regulation (EU) 2016/679
ЕООД	EOOD — single-member limited liability company
ЕИК	UIC — Unified Identification Code (company registration number)
чл. 6, пар. 1, буква „д“	Art. 6(1)(e) — the Bulgarian letter „д“ corresponds to the Latin letter (e) of the Regulation (public interest / official authority)
салон на вагона	carriage saloon (the passenger seating compartment of a railway car)
спален вагон	sleeping car

1. General information

The purpose of this notice is to explain to you how **“BDZ – Passenger Transport” EOOD** (hereinafter referred to for brevity as “the Company”) processes the data which it obtains by means of the video surveillance system in the saloons of the carriages of the trains, and also to provide you with information regarding the purposes, the grounds, the form and the scope of the video surveillance, what your rights are and the ways of exercising them.

This information concerns all clients of the Company who fall within the video surveillance zones.

Information signs bearing a camera symbol and a message concerning the carrying out of video surveillance are placed on the doors of every carriage of the trains in whose saloons video surveillance is carried out.

2. Definitions

Personal data is any information which relates to a natural person and by means of which that person may be identified directly or indirectly.

Processing of personal data is any operation or set of operations which may be performed in respect of personal data by automatic or other means.

The sites subject to video surveillance are the saloons of the passenger carriages and the corridors of the sleeping carriages equipped with a video surveillance system.

3. 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 2016/679 of the (EU).

“BDZ – Passenger Transport” EOOD adheres strictly to the laws and regulatory provisions concerning the collection and processing of personal data. That is why we regard it as our obligation to exercise due care in the processing of your personal data and to take all possible technical and organisational measures for protection against unlawful acts.

All employees of **“BDZ – Passenger Transport” EOOD** who take part in personal data processing operations on behalf of the data controller are trained and are bound by an obligation of non-disclosure of the personal data which they process.

4. Contacts 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

- Postal address — 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

5. Purpose of the processing of your personal data

“BDZ – Passenger Transport” EOOD uses video surveillance in the performance of statutory obligations applicable to the company and for reasons connected with the protection of the public interest and security (Art. 6(1)(e) of the General Data Protection Regulation), 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 visitors, increasing the safety of passengers, as well as ensuring a timely response in the event of incidents and where intervention by the law-enforcement authorities is required. Likewise, in order to limit the number of irregular/unticketed journeys, and in order to monitor the passenger load on a given route line, we carry out analysis and process data for statistical purposes.

Our ultimate purpose is to increase the satisfaction of the Company's customers from the use of rail transport by providing quality, safe and comfortable carriage.

We process your personal data only for the purpose for which it was collected and we do not use it for other, incompatible purposes.

6. Categories of personal data

The personal data which we process when you enter the surveillance zone consists of images and/or video recordings. These contain information about the physical identity of the passengers, as well as about their conduct at the sites subject to video surveillance. It is not necessarily the case that the images / video recordings constitute personal data, because an image / recording may contain your likeness but you may not be identifiable from it, since the resolution does not permit this, or because you have been filmed from behind and no other data is available in combination with which you could be identified.

The personal data is collected by means of the video surveillance system when the natural person enters the field of view of the cameras.

7. Retention period of the personal data

The overall retention period for the personal data from the video surveillance systems is **60 days**.

The video surveillance recordings are retained until the capacity of the local disk space is filled, within a period of not less than 14 days from their creation, after which the recordings are transferred to a stationary server for retention for up to 60 days.

All frames collected are automatically deleted on the 14th day from the local recording unit and on the 60th day from the stationary server.

The 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.

In order to prevent loss, misuse or unauthorised access, we apply all reasonable measures and means of protection, including limiting to a minimum the range of persons who have access to the recordings, and we ensure a special regime for their retention.

8. Automated decision-making and profiling

“BDZ – Passenger Transport” does not carry out automated decision-making or profiling of your data.

9. Transfer of personal data to third countries

“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.

10. Rights of data subjects

All customers of the rail transport service may exercise their rights under Art. 13–22 of Regulation (EU) 2016/679 before “BDZ – Passenger Transport” EOOD. Your rights in connection with the processing of your personal data are:

- **Right to information** about the processing of the personal data of individuals by the controller;
- **Right of access to one's own 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 processing** 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 data portability**;
- **Right to withdraw consent**;

- **Right to object or to lodge a complaint** 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 (postal or 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.

11. Right to lodge a complaint with the Commission for Personal Data Protection

If you consider that the processing of personal data in connection with the provision of transport services by **“BDZ – Passenger Transport” EOOD** is unlawful or infringes your rights, you may lodge a complaint with the Commission for Personal Data Protection:

- postal address: Sofia 1592, 2 “Prof. Tsvetan Lazarov” Blvd.;
- e-mail address: kzld@cpdp.bg.

12. Miscellaneous

Updating of this 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.

For questions concerning this Notice, as well as the processing of your personal data at **“BDZ – Passenger Transport” EOOD** and the exercise of your rights, please contact us at the e-mail address: **dpo_pp@bdz.bg**.

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**This notice was approved by the Management
of “BDZ – Passenger Transport” EOOD
In force as of 01.09.2026.**