

Data protection		
No	Question	Answer
1.	In reply to a question concerning data processing activities carried out by Sofia Airport EAD (SA EAD) dated 16.08.2018, it was stated that the data processing activities processing carried out by the company fully complies with the requirements of Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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 or GDPR). Please provide a description of the activities that SA EAD, in its capacity as a data controller has undertaken in relation to the implementation of the GDPR requirements.	There has been an external audit carried out by the law firm Ilieva, Vucheva & Co. concerning the activities and procedures for personal data processing in relation to the entry into force of the GDPR. After the audit, employees of Sofia Airport EAD have completed a training on the application of the GDPR. All necessary procedures, rules and policies in relation to personal data protection in the context of the operations of Sofia Airport EAD which are required under the GDPR, have been prepared and will be provided officially to Sofia Airport EAD until 7 September 2018 by the law firm Ilieva, Vucheva & Co. A technical audit of the information systems of Sofia Airport EAD is underway. Once both audits are completed, all procedures, rules and policies in relation to personal data protection prepared by the two consulting companies will be submitted for approval by the Executive Board of Sofia Airport EAD.
2.	Has an audit of SA EAD (internal or external) been carried out on the activities and procedures for data processing in connection with the entry into force of GDPR? If so, please provide us with information about the results and conclusions of such audit.	<p>Yes, there has been an external audit of Sofia Airport EAD on the activities and procedures for personal data processing in connection with the entry into force of GDPR, carried out by the law firm Ilieva, Vucheva & Co.</p> <p>There is a report with the results of the external audit for legal compliance which contains elements of the National Civil Aviation Security Program and is sensitive information including sensitive data.</p> <p>An external audit by the Amatas company of the information systems of Sofia Airport EAD is underway, concerning the activities and procedures for personal data processing in relation to the entry into force of GDPR.</p>
3.	Are the GDPR requirements for data processing activities carried out by SA EAD currently implemented? Please provide us for review the internal documentation on data processing activities adopted and implemented by SA EAD in connection with the implementation of the GDPR requirements.	Sofia Airport EAD is in the process of implementing the requirements of the GDPR and has not yet completed the adoption of the full documentation in relation to personal data processing based on an external audit carried out by the law firm Ilieva, Vucheva & Co. concerning the activities and procedures for personal data processing in relation to the entry into force of GDPR. After the audit, employees of Sofia Airport EAD have completed a training on the application of the GDPR. All necessary procedures, rules and policies in relation to personal data protection in the context of the operations of Sofia Airport EAD which are required

		under the GDPR, have been prepared and will be provided officially to Sofia Airport EAD until 7 September 2018 by the law firm Ilieva, Vucheva & Co.
4.	Under the draft Concession agreement from the Concession Commencement Date, the Concessionaire shall employ each Employee on the same employment terms. In this regard, please provide information on the measures and actions taken in connection with data processing of personal data of SA EAD. Additionally, please provide us with the internal documents (policies, rules, transparency notices, procedure, etc.) related to the processing of personal data of employees of the SA EAD adopted by the company in order to meet the requirements of the GDPR.	Please see the answer to question 1 above. The measures and actions taken in connection with the processing of personal data of employees of Sofia Airport EAD are part of the entirety of such measures and actions undertaken in order to achieve compliance of all operations of the company with the GDPR.
5.	In reply to a question dated 16.08.2018 it was stated that SA EAD processes also personal data as a data processor. In addition to airlines, with other categories of data controllers SA EAD has existing data processing agreements? Have the data processing agreements entered by SA EAD been updated in line with the new requirements introduced by Art. 28 of the GDPR? Please provide us for review the data processing agreement entered into SA EAD under art. 28 of the GDPR. Only if this is not possible, please provide us with an sample contract under Art. 28 of the GDPR entered into by SA EAD.	Sofia Airport EAD processes personal data as a data processor only as regards airlines.
6.	Does SA EAD process personal data of individuals ("data subjects") on the basis of consent to the processing of personal data? If so, please furthe clarify which categories of data subjects personal data are processed on the basis of consent for data processing and for what purposes this data are processed by SA EAD. Have the GDPR requirements for the consent as a ground for data processing been met?	Yes, Sofia Airport EAD does process personal data of individuals on the basis of consent for data processing. Sofia Airport EAD collects data on the first names, family names, emails and phone numbers of individuals for the purposes of sending news, carrying out promotional campaigns in the airport retail outlets and other commercial communications in relation to the operations of the company. Sofia Airport EAD collects data of individuals under the age of 16 and their parents for the purposes of carrying out organized school visits to Sofia Airport EAD, because such data are necessary for the issuance of passes granting access to the critical area of the restricted-access zone. Once the two audits are completed, all procedures, rules and policies in relation to personal data protection prepared by the two consulting companies will be submitted for approval by the Executive

		Board of Sofia Airport EAD. There are procedures developed on how to implement the requirements of the GDPR in the above cases and the said procedures are complied with in the context of the operations of Sofia Airport EAD.
7.	Please provide us for review the record under Art. 30, par. 1 of the GDPR for data processing activities kept by SA EAD as a data controller.	The record under Article 30, paragraph 1 of the GDPR for data processing activities kept by Sofia Airport EAD as a data controller will be provided not later than 7 September, after it is officially provided to Sofia Airport EAD by the law firm Ilieva, Vucheva & Co.
8.	Please provide us for review the record under Art. 30, par. 2 of the GDPR for data processing activities kept by SA EAD as a data processor.	The record under Article 30, paragraph 2 of GDPR for data processing activities kept by Sofia Airport EAD as a data controller will be provided not later than 7 September, after it is officially provided to Sofia Airport EAD by the law firm Ilieva, Vucheva & Co.
9.	Has SA EAD introduced internal procedure on the exercise of the "right of portability" of data subjects?	Once the two audits are completed, all procedures, rules and policies in relation to personal data protection prepared by the two consulting companies will be submitted for approval by the Executive Board of Sofia Airport EAD.
10.	Does SA EAD take decisions based solely on automated data processing involving profiling in relation to data subjects?	No, Sofia Airport EAD does not take decisions based solely on automated data processing involving profiling.
11.	Does SA EAD processes personal data as a "joint controller"? If so, please explain the purposes of such data processing, as well as please specify which other joint controllers are involved in such data processing activities.	No, Sofia Airport EAD does not process personal data as a joint controller.
12.	Has an internal procedure for undertaking of measures and actions in the event of data breach been adopted by SA EAD? Please provide us the said internal procedure for review.	Once the two audits are completed, all procedures, rules and policies in relation to personal data protection prepared by the two consulting companies will be submitted for approval by the Executive Board of Sofia Airport EAD.
13.	Has data protection impact assessment under art. 35 of the GDPR been carried out by SA EAD? Please provide us for review the opinion under art. 35 (2) GDPR of the designated Data Protection Officer on the need to carry out a data impact assessment. Please provide us for review the data impact assessment report. What technical and organizational measures have been taken by SA EAD in relation to the results of data impact assessment.	No data protection impact assessment under Article 35 of GDPR has been carried out, because it has been considered that the facts and circumstances that would require one do not exist.
14.	Does SA EAD transfer personal data to data controllers / data processors outside the	Yes, Sofia Airport EAD does transfer personal data to countries outside the EU/EAA. The transfer takes

	<p>EU/EEA? If so, please specify which personal data transmission tool has been used by SA EAD for such data transfer and/or what appropriate safeguards under Art. 46, par. 2 of GDPR have been applied?</p>	<p>place via the Amadeus CRS software which sends the passenger data to the U.S. Citizenship and Immigration Services (USCIS). The applicable safeguard under Article 46, paragraph 2 of GDPR is: (a) a legally binding and enforceable instrument between public authorities or bodies.</p>
<p>15.</p>	<p>Please provide us information about the type of special categories of personal data processed by SA EAD. Please also specify (i) the categories of data subjects (other than the employees of SA EAD) whose special categories of personal data are being processed by SA EAD, (ii) the purposes of such processing, and the legal basis for processing of special categories of personal data.</p>	<p>The company collects special categories of personal data – personal data concerning health and personal data relating to criminal convictions and offences. Medical certificates are collected upon an express request by the company. The documents containing special categories of data are: medical certificates, copies of documents for temporary work incapacity, health status data, including individuals’ height, weight, past diseases, a psychiatric certificate that the relevant employee is not kept on record, including a mental health certificate following a conducted interview, as well as additional data on diseases provided by occupational medicine services, and expert decisions by Territorail expert medical committees (TEMC). The Company also collects certificates of conviction which employees are expressly required to submit and which the company keeps after collection. The certificates of conviction contain the names of the relevant employees’ parents.</p> <p>Sofia Airport EAD keeps and processes personal data of individuals visiting Terminal 1 and Terminal 2 in relation to the provision of emergency medical care. The processing of personal data in the record is carried out for the purpose of ensuring medical services for flights, including for passengers, visitors to and employees of Sofia Airport EAD.</p> <p>The legal basis for the processing of personal data is compliance with a legal obligation of the controller (Article 6 (1) (c) of GDPR) arising from Ordinance No. 3 on emergency and rescue provision, and is necessary in order to protect the vital interests of the data subject or of another natural person (Article 6 (1) (d) of the Regulation).</p> <p>The data processed in connection with providing emergency medical care are the following:</p> <ul style="list-style-type: none"> a) First name, middle name, family name; b) Gender; c) Age; d) Nationality; e) Time of occurrence of the relevant incident; f) Persons present (first, middle and family names of third parties);

		g) Status; h) Treatment; i) Proposed follow-up action.
16.	Have the employees of SA EAD been trained in relation to the GDPR requirements?	Yes. The employees of Sofia Airport EAD have been trained by external consultants in relation to GDPR.