

Special Privacy Policy for Parcels (contractual offer)

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1. Subject and purpose of the present special privacy policy

The present Special Privacy Policy applies to the collection and processing of personal data by bpost within the framework of Parcels (contractual offer) and contains specific information on how bpost processes your personal data.

The present Special Privacy Policy must be read together with the **General Privacy Policy** disponible sur www.bpost.be. The Special Privacy Policy has precedence in the event of discrepancies between the General Privacy Policy and the Special Privacy Policy.

2. Bpost contact details when bpost acts as controller

The Controller is bpost, limited company under public law, with its registered office at Boulevard Anspach, 1, box 1, 1000 Brussels, with VAT number BE 0214.596.464.

3. Senders of mail (bpost customers)

When the Customer (the legal entity designated as customer in Contract) acts as Controller, bpost provides a link to the information documents of the Customer, which must follow all data protection rules (General Data Protection Regulation or specific law).

The Customer guarantees that its members of staff have been notified of the Processing of their personal data by bpost.

3.1 Senders – What personal data do we collect, to what ends and on what legal bases?

Categories of personal data

bpost collects and processes the following categories of personal data :

- last and first name, address, telephone/mobile number or email address and job title of certain members of staff of the Customer.

These personal data are collected through bpost apps connected to contract management and mail notifications.

Purposes and legal bases

The purposes and legal bases for the processing of personal data are set out in the table below.

Purposes	Legal bases
To handle the mail dropped off at a MassPost (Hyper) Centre or any other bpost drop-off point, to negotiate, enter into and/or perform a contract that you (or your organisation) wish to enter into or have entered into with bpost concerning Parcels (contractual offer), to provide and track requested products and/or services, to manage these contracts, for invoicing and recovery under such contracts.	<p>If bpost has entered into a contract with the data subject, the processing for these purposes is necessary for the entry into force or the performance of the <i>contract</i> between bpost and the data subject.</p> <p>In the absence of such a contract with the data subject or if the processing is not absolutely necessary for the performance of the contract, the processing will be necessary in the <i>legitimate interest</i> of bpost to process the personal data under these contracts.</p> <p>Some processing may also be necessary under a <i>legal obligation</i> imposed on bpost or to <i>carry out a mission of public interest</i>.</p>

<p>To be able to handle and, where applicable, respond to your question, communication or request (for example to provide information you request about Parcels), within the framework of the request or the provision of quotes, to provide requisite support and to handle incidents concerning Parcels, for general customer management.</p>	<p>If bpost has entered into a contract with the data subject, the processing for these purposes is necessary for the entry into force or the performance of the <i>contract</i> between bpost and the data subject.</p> <p>In the absence of such a contract with the data subject or if the processing is not absolutely necessary for the performance of the contract, the processing will be necessary in the <i>legitimate interest</i> of bpost to process the personal data under these contracts.</p> <p>Some processing may also be necessary under a <i>legal obligation</i> imposed on bpost or to <i>carry out a mission of public interest</i>.</p>
<p>To improve bpost websites, apps, products and services (for example by gathering feedback based on satisfaction surveys).</p>	<p>This processing is founded on bpost's <i>legitimate interest</i> to continually improve and adapt its websites, apps, products and services.</p>
<p>To send advertising, personalised or otherwise, relating to bpost's products and services by post, by email, by telephone, through advertising platforms (such as Google, Apple Store, Android or the My bpost app); to display advertising, personalised or otherwise, on bpost's products and services on bpost's websites on in bpost's apps.</p> <p>Within the framework of this personalised advertising, and in accordance with the Optimal level of confidentiality, bpost creates a buyer profile based on personal data, your preferences, your interests, as well as public statistical and anonymised data and/or data that other companies have legally collected and transferred to bpost, such as your buying behaviour, your television preferences or your navigation habits.</p> <p>Generally, bpost may contact you by any channel you use (email, post, telephone).</p>	<p>This processing in order to send non-personal (generic) advertising is founded on bpost's legitimate interest to promote its products and services. You may object to this processing at any time in the "Your data, your choices" dashboard by changing the Complementary level.</p> <p>This processing in order to create a profile and send personalised advertising is founded on the consent you give by checking the Optimal level "Personalised information". You may withdraw this consent at any time in the "Your data, your choices" dashboard.</p>

3.2 Senders – Does bpost use your personal data for profiling or automated decisions?

bpost establishes user profiles regarding its websites, apps, products and services in order to propose personalised advertising. bpost infers the information concerning your interests and preferences from personal data that it collects on your use of bpost's websites, apps, products and services. bpost establishes and uses profiles to send or display personalised advertising based on these interests and preferences.

bpost does not make automated decisions within the meaning of article 22 of the General Data Protection Regulation, that is to say automated decisions with a significant or legal impact on you, within the framework of Parcels (contractual offer).

3.3 Senders – With whom do we share your personal data?

bpost shares the personal data collected and processed within the framework of Parcels (contractual offer) with:

- Service providers acting as processors, particularly providers of hosting services, DXC servers (located in Belgium and the Netherlands), AWS servers (located in Ireland) and Microsoft Azure servers (located in the European Economic Area, primarily in Frankfurt, Germany) and technical infrastructure maintenance and management services that may have access to the data, TCS and Infosys (both located in India).
- Furthermore, the Personal Data will be made available to operators of advertising platforms (such as Google, Facebook, Twitter and LinkedIn) to check the existence of an account linked to the stated email addresses and to be able to send messages through those platforms. If they are located outside the European Economic Area, the model contractual clauses of the European Commission apply to them.

3.4 Senders – Will your personal data be transmitted to countries outside the European Economic Area?

Some service providers and third parties with which your personal data are shared are located in a country outside the European Economic Area where the data protection rules differ from those that are effective in Belgium and elsewhere in the European Economic Area, including India.

bpost has taken the necessary steps to ensure an adequate level of protection for your personal data in accordance with the **General Privacy Policy**.

3.5 Senders – How long do we keep your personal data?

The personal data collected and processed within the framework of Parcels (contractual offer) will be kept for the duration of the contract and for the duration needed to protect the interests of bpost in court if the quality of the services provided by bpost is disputed.

3.6 Senders – What are your rights in relation to your personal data?

You have the rights set out in the **General Privacy Policy**, insofar as they comply with the conditions of the General Data Protection Regulation.

If you wish to exercise your rights with regard to bpost, you can contact bpost as set out in article 3.7 “How can you contact bpost?”.

3.7 Senders – How can you contact bpost?

You can contact bpost with any questions or complaints you may have or to exercise your rights:

- Online by means of the corresponding **webform**;
- By post to: bpost, Data Protection Office, Boulevard Anspach 1, box 1, 1000 Brussels.

For security reasons, we ask you to provide your full contact details and proof of your identity (for example a copy of the front and back of your identity card or your driving licence on which your photo and national register number have been masked). As applicable, bpost reserves the right to request additional supporting documents.

bpost may reject requests that it deems excessive or that constitute an abuse of the applicable right.

4. Addressees of mail

The provision of services by bpost requires the Customer to share Personal Data on the addressees of mail items.

Insofar as bpost processes this Personal Data to perform the Contract, that is to organise the sorting, delivery and tracking of the Parcel, it acts as the Controller of this Personal Data.

bpost :

- checks the processing operations with a view to the Processing and delivery of the Parcel;
- decides which Personal Data must be provided;
- determines whether this Personal Data must be entered into operational databases for quality improvement purposes (by optical reading or matching with other data sets);
- determines whether this Personal Data should be used to improve delivery quality (such as by association with delivery preferences data);
- determines whether this Personal Data should be transmitted to third parties (such as those acting as processors on behalf of bpost);
- determines how long this Personal Data should be kept;
- determines who may access these Personal Data and to which third parties they are transferred;
- determines which technical and organisational measures are taken to protect the Personal Data.

The Personal Data relating to addressees of the Parcels entrusted to bpost by the Customer (the following categories of personal data: first name, last name, email addresses, telephone numbers, delivery addresses) will be used by bpost, by the subsidiaries of bpost or by the processors of bpost (Dynamlogic, Citydepot, Parcify, De Buren and the processors of bpost) to transport the Parcel.

The Customer acts as Controller with regard to this transfer and the processing for which it establishes the purposes and means of Processing, including collection, encoding, updating and transmission to bpost.

The Customer guarantees bpost that (i) the Personal Data is obtained legally from the Subjects by virtue of the applicable Privacy Regulation and that it is also provided to bpost in compliance with this regulation; (ii) it gives bpost Personal Data that is up to date and pertinent bearing in mind the purposes described in the Contract; (iii) it has given the Subjects all the necessary and pertinent information with regard to the Processing of their Personal Data, in accordance with the applicable Privacy Regulation; and (iv) the Processing does not infringe on the rights of third parties.

bpost and the Customer undertake to fulfil all obligations imposed on Controllers by virtue of all the personal data protection rules with regard to the Processing for which they act as Controller.

4.1 Addressees – What personal data do we collect, to what ends and on what legal bases?

Categories of personal data

bpost collects and processes the following categories of personal data within the framework of the handling of Parcels (contractual offer):

- last names, first names and addresses of the addressees.
- email addresses and/or mobile phone numbers of the addressees;
- signature of the person who takes receipt of a Parcel requiring a signature for delivery.

Purposes and legal bases

Les finalités et bases légales du traitement des données à caractère personnel sont exposées dans le tableau ci-dessous.

Purposes	Legal bases
The email addresses and telephone numbers of the addressee of the Parcel that bpost receives from the Customer may be used by bpost to notify this addressee of the operational status (including the assessment of the operational service) of the Parcels that bpost delivers or to suggest the addressee registers his or her delivery preferences on its dedicated platform.	This Processing is based on bpost's legitimate interest to provide the best possible level of service to its Customers.

The addresses of the addressees of Parcels, who have purchased the contents of these Parcels, as provided to bpost by the Customer, may be reused by bpost or by its subsidiaries to facilitate future online purchases by the same addressees by offering them an address autofill service with regard to these addresses.	This Processing is based on bpost's legitimate interest to provide the best possible level of service to its Customers.
To ensure the handling and delivery of the Parcels, the potential optical reading on the sorting machines (by direct optical reading or by comparison with other data sets) for the purposes of improving quality, correcting addresses that do not unequivocally match a delivery address without an additional search or augmenting the operational databases with the aim of improving address recognition performance.	This Processing is based on bpost's legitimate interest to provide the best possible level of service to its Customers.
bpost may securely match the address, last name and first name, and email address of the addressee of the Parcel to the delivery preferences as stated on its dedicated platform.	This Processing is based on bpost's legitimate interest to provide the best possible level of service to its Customers.
The first name, last name, delivery address, delivery date and signature of the addressee of a Parcel can be provided by bpost on the track and trace platform, where they remain for three months to provide the Customer with information on the delivery of its mail.	This Processing is based on bpost's legitimate interest to provide the best possible level of service to its Customers.

4.2 Addressees – Does bpost use your personal data for profiling or automated decisions?

bpost does not make automated decisions within the meaning of article 22 of the General Data Protection Regulation, that is to say automated decisions with a significant or legal impact on you, within the framework of Parcels (contractual offer).

4.3 Addressees – With whom do we share your personal data?

bpost shares the personal data collected and processed within the framework of Parcels (contractual offer) with:

- Service providers acting as processors, particularly providers of hosting services, DXC servers (located in Belgium and the Netherlands), AWS servers (located in Ireland) and Microsoft Azure servers (located in the European Economic Area, primarily in Frankfurt, Germany) and technical infrastructure maintenance and management services that may have access to the data, TCS and Infosys (both located in India);
- The sender of the Parcel, in particular if it has selected the Signature option with regard to the electronic notification, a digital receipt notice containing the signature of the person who takes physical receipt of the mail;
- All the service providers, acting as processors or controllers within the framework of the handling of Mail (including delivery), in particular other postal operators for international Parcels.

4.4 Addressees – Will your personal data be transmitted to countries outside the european economic area?

Some service providers and third parties with which your personal data are shared are located in a country outside the European Economic Area where the data protection rules differ from those that are effective in Belgium and elsewhere in the European Economic Area, including India.

bpost has taken the necessary steps to ensure an adequate level of protection for your personal data in accordance with the [General Privacy Policy](#).

If the Services include the delivery of a mail item in a country not located in the European Economic Area, the Personal Data relating to addressees of mail items entrusted to bpost by the Customer (that is, the following categories of Personal Data: first name, last name and delivery address) are shared with a local operator responsible for delivering the mail in this foreign country, which acts as Controller for the purposes of delivering the mail in this foreign country. If it is located outside the European Economic Area, the model contractual clauses of the European Commission have already been imposed on it.

4.5 Addressees – How long do we keep your personal data?

The personal data collected and processed within the framework of the Parcels (contractual offer) will be kept for a term of 13 months. Parcels (contractual offer). The data will be automatically erased at the end of the retention term.

4.6 Addressees – What are your rights in relation to your personal data?

You have the rights set out in the General Privacy Policy, insofar as they comply with the conditions of the **General Privacy Policy**.

If you wish to exercise your rights with regard to bpost, you can contact bpost as set out in article 4.7 “How can you contact bpost?”.

4.7 Addressees – How can you contact bpost?

You can contact bpost with any questions or complaints you may have or to exercise your rights:

- Online by means of the corresponding **webform**;
- By post to: bpost, Data Protection Office, Boulevard Anspach 1, box 1, 1000 Brussels.


For security reasons, we ask you to provide your full contact details and proof of your identity (for example a copy of the front and back of your identity card or your driving licence on which your photo and national register number have been masked). As applicable, bpost reserves the right to request additional supporting documents.

bpost may reject requests that it deems excessive or that constitute an abuse of the applicable right.

5. Amendments to the present special privacy policy

bpost reserves the right to amend the present Special Privacy Policy in order, among other things, to reflect a change to a service or the legal and/or regulatory requirements. The amendments to the present Special Privacy Policy come into effect when they are published. We recommend that you always check the most recent version. The date of the most recent version is stated at the top of the present Special Privacy Policy.



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 www.bpost.be