

Specific Privacy Policy – Mobile Postcard

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1. SUBJECT AND PURPOSE OF THE SPECIFIC PRIVACY POLICY

The present Specific Privacy Policy applies to the collection and processing of personal data by bpost within the framework of Mobile Postcard and contains specific information on how bpost processes your personal data.

The present Specific Privacy Policy must be read together with the General Privacy Policy available at www.bpost.be. The Specific Privacy Policy has precedence in the event of discrepancies between the General Privacy Policy and the Specific Privacy Policy.

2. WHO IS THE CONTROLLER?

The personal data communicated by the Customer about himself using the Application (first name, name and address, e-mail address, date of birth and gender) will be processed by bpost, a limited liability company under public law with its registered office at Multitower, Anspachlaan1, box 1 1000 Brussels, RPR Brussels VAT BE 0214.596.464.

The personal data of the addressee of the Card (first name, name and address) will only be processed with a view to bpost sending the Card. The Customer shall act as data controller of these data. The Customer also acts as the data controller of the personal data relating to the persons who may be depicted in the photos that it sends to bpost within the framework of the performance of the agreement. In this regard, the Customer must ascertain the legality of the collection and transfer of these data to bpost, the use that bpost makes of these data at its request (in its capacity as sub-processor of personal data); it must inform these persons of these processing operations (and of what follows) and respond to any questions they may have concerning the exercise of their rights.

3. 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 name
- First name
- Address
- Return address

- Email
- Birthdate
- Sex

These personal data are collected through Mobile Postcard app. For more information about cookies and similar technologies, see our information notice on the use of cookies.

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
<p>To provide the Mobile Postcard services, send the cards and manage contractual relations with customers as well as contact customers in case of problems</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 contract between bpost and the data subject.</p> <p>If the question, communication or request is not linked to an agreement between the data subject and bpost or if the support to or interaction with the data subjects is not strictly necessary for the performance of the agreement, the processing is based on the legitimate interest of bpost to ensure good relations with its customers or third parties.</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 the bpost products or services), within the framework of the request or the provision of quotes, to provide requisite support and to handle incidents concerning bpost products or services, 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 contract 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 the Mobile postcard application (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, on bpost's products and services by post, email, phone or advertising platforms (Android, App Store, Google, etc..) or through Mobile Postcard 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 Privacy Level, bpost will create a buyer profile based</p>	<p>This processing to send non-personalised (generic) advertising is based on the legitimate interest of bpost to promote its products and services. You can object to this at any time via "Your data, your choice" dashboard by changing the Additional level.</p> <p>Processing the data to create a profile and sending personalised advertising is only allowed after you have given your consent. To do so, tick the level Optimal "Customised information". You can object to</p>

on your personal data, preferences, interests and public statistical and anonymised data and/or data legally collected about you by other companies (subject to your consent), such as your buying, viewing or surfing behaviour.

this at any time via the "Your data, your choice" dashboard.

4. DOES BPOST USE YOUR PERSONAL DATA FOR PROFILING OR AUTOMATED DECISIONS?

bpost establishes user profiles (only based on your consent) 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 an automated decision with a significant or legal impact on you, within the framework of the Mobile Postcard application.

5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

bpost shares the personal data collected and processed within the framework of Mobile Postcard with:

- Service providers acting as processors, DJM WEB SPRL, subcontractor of bpost and developer and administrator of the Application, Infosys, Indian IT maintenance provider as well as Group Joos, the printer of the cards.

6. 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.

7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The personal data, the Customer's account as well as his remaining credits collected and processed in the framework of Mobile Postcard will be kept for three years from the last login in the application. Photos are retained for 15 days from the date of sending the card. Movies are retained for 1 year from the date of shipment of the video card.

8. 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 9 “How can you contact bpost?”

9. HOW CAN YOU CONTACT BPOST?

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

- Online by means of the corresponding webform;
- By post to: bpost, attn. Data Protection Office, MultiTower, Anspach Boulevard,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.

10. AMENDMENTS TO THE PRESENT SPECIFIC PRIVACY POLICY

bpost reserves the right to amend the present Specific 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 Specific 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 Specific Privacy Policy.