

# Special Privacy Policy for Distripost Mail Items (Domestic Unaddressed)

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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 the Distripost product (Domestic unaddressed Mail Items) 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** available at [www.bpost.be](http://www.bpost.be). The Special Privacy Policy has precedence in the event of discrepancies between the General Privacy Policy and the Special Privacy Policy.

The subjects of this Special Privacy Policy are customers (or members of staff of customers) of bpost, hereinafter “data subjects”, that have contracted the Distripost service as shippers of unaddressed mail items.

## 2. Who is the 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.

### 2.1 What personal data do we collect, from what sources, 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 (for invoicing and pick-up), telephone/mobile number and email address, and position, language and title of the Customer (or the member of staff of the Customer).

These personal data are collected through bpost apps connected to contract management and drop 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 Unaddressed Mail Items under a Distripost agreement (such as Distripost Boost, Distripost Intense, Distripost Press, Distripost Public, Distripost Elections or Distripost Death Announcement), 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 Unaddressed Mail Items, 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 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 legitimate interest of bpost to process the personal data under these contracts.</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 Unaddressed Mail Items), within the framework of the request or the provision of quotes, to provide requisite support and to handle incidents concerning Unaddressed Mail Items, 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. This processing may also be necessary if bpost and the data subject enter into a contract.</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 legitimate interest of bpost to process the personal data under these contracts.</p> |
| <p>When you make your wish known to receive incident alerts by filling out the attached form, bpost collects your contact data for information purposes, particularly in the event of service interruptions.</p>   | <p>Processing is based on your consent given by means of the <b>“Configuring incident alerts”</b> form.</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>The Customer guarantees that its members of staff have been notified of the aforementioned Processing of their personal information by bpost.</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 <i>legitimate interest</i> to promote its products and services. You may object to this processing at any time in the <b>“Your data, your choices”</b> 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 <b>“Your data, your choices”</b> dashboard.</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 legitimate interest to continually improve and adapt its websites, apps, products and services.</p>   |

## 2.2 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 Unaddressed Mail Items (Domestic).

## 2.3 With whom do we share your personal data?

bpost shares the personal data collected and processed within the framework of the handling of mail items entrusted to bpost 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).

## 2.4 Are your personal data 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**.

## 2.5 How long do we keep your data?

The personal data collected and processed under Unaddressed Mail Items (Domestic) contracts are kept for 3 years after the contract end date and then erased.

## 2.6 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 2.7 "How can you contact bpost?".

## 2.7 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 relevant **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). Where 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.

### 3. 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.