



# Privacy Notice- Applicants

Last revised on 05/04/2024

## 1. Scope and purpose of this specific privacy notice

This Specific Privacy Notice applies to the collection and processing of personal data by bpost SA/NV (“bpost”) in the context of the bpost career website <https://career.bpost.be/en> and, more generally, in the context of bpost’s recruitment activities (included for applications submitted via a postal address), and contains the specific information on how bpost processes your personal data in this context. Please note that our processing of employees’ personal data is subject to a separate privacy notice.

## 2. Who is the controller?

The Controller is bpost SA/NV, a limited company under public law with its registered office at 1000 Brussels, Anspachlaan 1 box 1, RLE Brussels VAT BE 0214.596.464. Hereafter also referred to as “we” or “us”.

## 3. What personal data do we collect, what are our sources, for what purposes and on what legal basis?

### Categories of personal data

bpost collects and processes the following categories of personal data:

For all applicants :

- Standard identification and contact details (including your name, first name(s), telephone number, e-mail address);
- Your photograph if you provide it voluntarily (e.g. included in your CV);
- Data related to your professional experience (profession, (previous) job(s), profile, data on previous employers, termination of last jobs and work delivered, special projects, working status, etc.) including a reference check if you have provided references in your CV or during the recruitment process;
- Work history at bpostgroup<sup>[1]</sup> (where applicable);
- Data related to your education (diplomas, certificates, internships, references, specific training courses, tests results, etc.);
- Language skills;

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[1] bpostgroup is a group of companies including bpost SA/NV and all its subsidiaries.

- If applicable, whether or not you have a work/residence permit in the European Economic Area (EEA) incl. data related to your right to reside and your right to work and your passport or ID card (where necessary or mandatory);
- If applicable and where necessary regarding the function for which you apply, we proceed to a check of the information in your criminal record;
- The results of psychometric assessments and digital tests;
- Digital assessment via the internet (presence on professional social media such as LinkedIn), to the extent this information is accessible to us;
- Results (positive or negative) of physical capacity questionnaire to comply with Wellbeing at Work Code (where necessary depending on the future function);
- Any personal data that is publicly available on professional social media (e.g. LinkedIn);
- Recruiter comments concerning your professional capacities and your personality;
- Any personal data (other than the above) that you (or the external recruiter) provide to us in the course of the application process (for instance mentioned in your CV) or that must be processed by law.

For applicants who may be hired with a bpost contract after positive assessment :

- Postal address;
- Personal characteristics (your place and date of birth, nationality, sex);
- Frontier worker or not;
- Bank account number;
- Recognized handicap (and a certificate of disability recognition where applicable);
- Household composition and children;
- Contact persons in the event of an emergency;
- Proof of a valid driving license ;
- Civil status;
- National registration number;
- Identity card;
- [Only for functions related to our activities falling within the scope of the Anti-Money Laundering law]: results of research done pursuant the Anti Money Laundering Law.

### Sources

This personal data is collected via the above-mentioned career website of bpost, social media websites, one of the bpostgroup websites, our external recruitment partners (incl. head-hunter, interim offices,...), one of your network contact working at bpost referring you, and/or in the course of the (physical) recruitment process.

Unless we specifically state so, you are not required to share all the above information with us as part of an application. However, if you do not share the specifically requested data, we may not be able to assess your application.

In principle, we do not process special categories of personal data, from you, such as health data or other types of sensitive data unless you freely and voluntarily provide it to us as part of your application documents or when it is necessary to comply with a legal obligation (e.g. offering a safe workplace in accordance with the Wellbeing at Work Code, tax obligations).

Only for functions related to our activities falling within the scope of the Anti-Money Laundering law (Belgian Law of September 18th, 2017, on the prevention of money laundering and terrorist financing and on limiting the use of cash) does our Anti-Money and Laundering team perform research on the Dow Jones database and conduct a digital assessment via the Internet.

We and our service providers may use “cookies” and similar technologies on the Careers Site. Please see our Cookie Policy for more information: <https://www.bpost.be/nl/cookie-policy? ga=2.56289067.1803396688.1681725269-1137112283.1573119944>

## Purposes and legal bases

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

Purposes	Legal bases
<p>Search for relevant profiles: creation of a platform for submitting applications on bpost's career website (spontaneous or in response to a job offer), use of websites offering job offers to candidates (e.g. LinkedIn)</p>	<p>The processing is necessary for the legitimate interest of bpost in finding suitable candidates for job offers.</p>
<p>Assess the applications for a position and make decisions on recruitment and career development at bpost</p> <p>Maintaining records about recruiting and hiring</p> <p>Conducting background/reference checks</p> <p>To communicate with you and respond to your requests or application</p>	<p>The processing is necessary for the legitimate interest of bpost to process the personal data in the context of recruitment.</p> <p>Certain processing activities are necessary to comply with a legal obligation imposed on bpost (work permit legislation,...).</p>
<p>In case of a positive assessment:</p> <p>Onboard a candidate and create a file under your name in our HR information system</p> <p>Preparing and concluding the employment contract or other type of agreement</p> <p>Specificities related to activities falling under the Belgian Law of September 18th, 2017, on the prevention of money laundering and terrorist financing and on limiting the use of cash (only when first positive assessment done): verify that the person to be hired demonstrate appropriate reliability, taking into account the risks associated with the missions and functions to be performed, pursuant the Anti Money Laundering Law</p>	<p>The processing is necessary for the conclusion and/or performance of the contract between you and bpost.</p> <p>Certain processing activities are necessary to comply with a legal obligation imposed on bpost. If the processing is not absolutely necessary for the conclusion or the performance of the contract, the processing will be necessary in the legitimate interest of bpost to process the personal data.</p> <p>Legal obligation (Belgian Law of September 18th, 2017, on the prevention of money laundering and terrorist financing and on limiting the use of cash, article 8)</p>
<p>In case of a negative assessment:</p> <p>To store your CVs and contact details for consideration for further employment opportunities</p>	<p>The processing is necessary for the legitimate interest of bpost to process the personal data.</p>
<p>Use of digital tools to assess a candidate's suitability for a job and professional aptitudes: psychometric assessments and digital tests. Please also see section 4 of this Specific Privacy Notice.</p>	<p>The processing is necessary for the legitimate interest of bpost to process the personal data.</p>

For managing disputes/legal claims	The processing is necessary for bpost's legitimate interest in defending itself in and out of court.
Check the validity of your driving license if your job requires it, or before entrusting you with a vehicle	The processing is based on our legal obligation (Act 16 March 1968 related to road traffic police and Articles 5 and 41bis of the Belgian Penal Code).
Protecting the workplace and communicating with medical professionals or when a medical check is necessary with regard to a dedicated position  The recognized disability status, if any, is necessary to calculate the withholding tax on professional income directly deducted from payroll.  Apart from the above, any information regarding your health you proactively and voluntarily provide will be processed only if necessary for the purposes of your application.	To comply with our legal obligation (Article I.4-46,47 related to prior health assessment for the candidate of the Wellbeing at Work Code) for the purposes of the assessment of the working capacity of the employee.  To comply with our legal obligation (Article 275, §§1 and 2, of the Income Tax Code of 1992).  The personal data is collected and processed based on your explicit consent.
Some of your information, as your National Registration Number, is necessary to comply with our social obligations (e.g. social security declarations) to the ONSS/RSZ/LSS	To comply with our legal obligation as employer and carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.

#### 4. Does bpost use your personal data for profiling or automated decision-making?

bpost does not take decision regarding your hiring process based solely on automated decision making within the meaning of Article 22 of the General Data Protection Regulation. When we use digital tests during the hiring process, the results of these tests are not in themselves sufficient to take a decision on the outcome of your application and are always analysed by your recruiter. You will also have the opportunity to make your point on the outcome.

#### 5. With whom do we share your personal data?

The personal data collected and processed in the context of the career website, and more generally, bpost's recruitment activities are shared by bpost in particular with:

- bpostgroup subsidiaries, when justified by the purpose;
- Service providers acting as data processors, in particular hosting service providers (Cornerstone which is a SAAS we use) who process this data for hosting and purposes or maintenance ICT services providers (Infosys, TCS) located in India;
- Recruitment partners (interim agencies, headhunters) acting as data controllers or processors, in back-up or reinforcement of bpost internal recruitment teams who process personal data according to their own privacy notices (Startpeople, Manpower, Accent Jobs, Ago...);

- If applicable, bpost driving school, our labour medicine partner (Cohezio), external independent doctors who will need certain data to enroll applicants in driving test/training and medical questionnaire/exam;
- Competent public administrations like ONSS/RSZ/LSS, where necessary.

## 5.1 Medical controls process

For some positions within bpost, we must evaluate if providing a specific job to a particular candidate is risky for the health and safety of the applicant. Therefore, we work with an external labour medicine partner (Cohezio) that analyses the applicant's physical abilities (after completing a secured and confidential questionnaire) to avoid providing the applicant with a job that risks their health and safety.

The labour medicine partner will directly receive the questionnaire, and bpost (or its recruitment partner) will only receive the conclusion of the assessment (positive or negative). If the evaluation is negative, bpost asks an external doctor to conduct a medical check. According to the doctor's decision (again, bpost only receives the assessment result), the recruitment process stops or continues.

## 6. Will your personal data be transferred to countries outside of the European Economic Area?

Certain service providers or third parties to whom your personal data are transferred may be located in a country outside the European Economic Area where the data protection rules differ from those applicable in Belgium and elsewhere in the European Economic Area. In such a case, bpost takes the necessary measures to ensure an appropriate level of protection for your personal data and provides at least one of the following guarantees:

- For transfers to countries that are deemed not to provide an adequate level of protection (so-called "third countries"), bpost provides additional safeguards, such as the conclusion of standard contractual clauses of the European Commission, which ensure that personal data is given protection equivalent to that provided in the European Economic Area.

In the cases where bpost uses the standard contractual clauses of the European Commission for transfers to third countries, bpost has also carried out an analysis of the level of protection offered by the legislation in these third countries and, where necessary, has taken additional measures to ensure that the level of protection is essentially equivalent to that within the European Economic Area. More information on these measures (including a copy of the standard contractual clauses) can be obtained by contacting bpost as described in point 9 "How to contact bpost".

## 7. How long do we keep your data?

In the event of a positive assessment and decision to employ you, your personal data will be retained in accordance with our Employee Privacy Notice which sets out the relevant retention periods for processing employee personal data.

If your application for employment is unsuccessful, we will keep your personal data for 1 year from your last login to your profile on the Career site<sup>[2]</sup> (Cornerstone Platform) for consideration for further employment opportunities, unless you object. At the end of this period, your personal data will either be deleted or anonymized (it will be impossible for us to link the limited stored information to you).

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[2] If you've never logged in, the timeline begins when your profile is created by the recruiter in charge of your application.

However, we can delete personal information about you (including your CV/ resume) from our database at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

The file containing the results of research done pursuant the Anti Money Laundering Law done by our Anti Money Laundering team are only accessible by this team and are deleted 1 year after the creation of the file.

Images recorded by surveillance cameras in our premises are kept for thirty days from the visit, except otherwise requested by the authorities.

## 8. What rights do you have in relation to your personal data?

Under the terms of the General Data Protection Regulation, you have the following rights:

- **Right of access** - You have the right to access the personal data that bpost processes about you and to obtain a copy of these personal data (subject to certain exceptions).
- **Right to rectification and erasure** - You have the right at any time to have your personal data rectified or erased by bpost free of charge, provided that the legal conditions for doing so are met. Personal data for which bpost is legally obliged to hold cannot be deleted before the end of the provided retention period. Please note that you can anonymize your profile by yourself at any time by login into your Profile on the Career site (Cornerstone Platform) via Settings.
- **Restriction of processing** - You can require bpost, subject to compliance with the applicable legal provisions, to restrict the processing of your data.
- **Right to data portability** - Under certain conditions, you have the right for the data you have provided to us to be transmitted to you in a structured and interoperable format, or be transmitted directly by us to another data controller, provided that this is technically possible.
- **Objection** - You may object to processing for the legitimate interests of bpost on grounds related to your specific situation.
- **Withdrawal of consent** - If bpost processes your personal data on the basis of your consent, you have the right to withdraw it at any time. However, this withdrawal will not affect the lawfulness of the processing of your personal data for the period prior to the time of withdrawal and for processing activities based on another legal basis.

If you wish to exercise your rights in relation to bpost, you can contact bpost via the contact details described in point 9 “How can I contact bpost?”.

You always have the right to contact and make a complaint to the data protection supervisory authority of the Member State of the European Economic Area where you normally reside, where you have your place of work (if applicable) or where the alleged breach has taken place, and to lodge a complaint if appropriate. For Belgium, this is the Data Protection Authority ([www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)).

## 9. How can I contact bpost?

For questions, complaints or the exercise of your rights, please contact bpost and its data protection officer (“DPO”):

- Online via the [web form](#) provided for this purpose;
- By post at the following address: bpost, addressed to the Data Protection Office, Anspachlaan 1 box 1, 1000 Brussel.

For security reasons, we ask you to accompany requests with your full contact details and a means of verifying your identity (e.g. a copy of the front of your identity card or driving licence with the photo, national registration number and card number rendered illegible). bpost reserves the right to request additional supporting documents where necessary.

bpost may reject requests that it considers excessive or constitute an abuse of the relevant right.

## **10. Amendments to this specific privacy notice**

bpost reserves the right to modify this Specific Privacy Notice, inter alia to adapt it to amended legal and/or regulatory requirements. Amendments to this Specific Privacy Notice take effect at the time of publication. We recommend that you always consult the most recent version. The date of the last revision is indicated at the beginning of this Specific Privacy Notice.