



An Post

Employee Privacy Statement

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Document Control

Version History

Version	Date Released/Reviewed	Contributor(s)	Description
1.0	May 2018	Data Privacy Project Group	Employee Privacy Statement – Informs employees on the ways that their personal data is processed
1.1	April 2019	Data Privacy Office	Added cover sheet – No other updates required. Confirmed with HR An Post.
1.2	November 2020	Data Privacy Office	No further updates
1.3	October 2021	Data Privacy Office	Update on Covid 19 and the return to work – Update on Employee Assistance Program – Update on the use of the Post People App
1.4	November 2022	Data Privacy Office	Update policy as per Grant Thornton Recommendations
1.5	March 2023	Data Privacy Office	Updated to link CBRE Privacy Policy for An Post employees working in the EXO building
1.6	December 2023	Data Privacy Office	Review and update with new Privacy Office Address

Document Approval

Approved by	Position	Date
Frank Ennis	An Post Data Protection Officer	December 2023

Distribution List

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Intranet	An Post	N/A	December 2023

Employee Privacy Statement

Purpose

An Post (“**An Post**”, “**we**” or “**us**”) needs, on an ongoing basis, to process certain personal data relating to its employees. This Privacy Statement explains how we will manage your Personal Data as an employee, why we use it, and how you may contact us in relation to our use of your Personal Data.

An Post acts as the Controller for your Personal Data and, as such, is subject to the Regulation (EU) 2016/679, commonly called the GDPR and the Data Protection Act, 2018. The lawful basis for An Post processing your Personal Data is the contract of employment between you and An Post.

Scope

This Privacy Statement applies to all An Post employees.

Personal Data We Process About You

Personal Data means any information which An Post has or obtains, or which you provide to us, from which you can be directly, or indirectly, personally identified. It includes information such as your name, address, email address, telephone number(s), date of birth, photo identification, tax references, bank account numbers and online identifiers. Some of this Personal Data may be sensitive or “**Special Category**” Personal Data, such as data revealing your racial or ethnic origin, trade union membership or data concerning your health (“**Sensitive Personal Data**”).

A list of the types of Personal Data which we hold about our employees is appended to this Privacy Statement.

How we collect your Personal Data

We will obtain some of your Personal Data directly from you; for example, that which you provided when you initially applied for a job with the Company, when you apply for a position as part of an internal competitive selection process, or where you provide additional information to us in the course of your employment. We will also obtain information which arises naturally in the course of your employment, such as the length of your tenure and salary details.

We may also obtain some of your information indirectly, from a variety of sources, such as recruitment agencies, a trade union, customer or supplier / partner feedback (solicited or unsolicited), An Garda Síochána (e.g. in relation to security clearance), medical practitioners through medical reports (e.g. where you undergo a medical examination connected to your employment), other third parties to whom you give your Personal Data and people or institutions that make representations on your behalf.

Why we use and hold your Personal Data

We will use your Personal Data:

- (a) for the purposes of performing the employment contract between us, including:
 - (i) salary, benefits and pensions administration;
 - (ii) attendance management, probation management, performance appraisal, grievance management and the management of disciplinary matters. See the relevant HR policies and procedures for further information;
 - (iii) health administration and for the purposes of health insurance / benefits management and administration;
 - (iv) training and development purposes;
- (b) for compliance with our legal obligations, including:
 - (i) health and safety purposes;
 - (ii) compliance with applicable tax and regulatory reporting obligations;
 - (iii) where we are ordered to disclose information by a court with appropriate jurisdiction;
- (c) where our use is for a legitimate purpose of the An Post Group, including:
 - (i) day to day operational and business purposes, which includes board and group reporting and management purposes;
 - (ii) monitoring the use of IT and other Company equipment and property. This includes the use of video cameras for security purposes and to protect our property, including our confidential information and intellectual property. Very exceptionally, should a significant issue arise regarding employee safety, or a security matter, data from IT systems may be gathered as part of subsequent investigations and form part of disciplinary proceedings with individual employees. See our separate CCTV, Internet Use and Email Acceptable Use Policies and Company Vehicle Telematics notice circulated to all staff driving company collection and delivery vehicles for further information;
 - (iii) managing our contracts and relationships with our customers, suppliers, service providers, vendors and other commercial partners;
 - (iv) taking advice from our external legal and other advisors;
 - (v) the provision of information and news to you relating to products and services of the An Post Group as part of your role as an An Post employee,

- (vi) where we are permitted to do so, the provision to you of information in relation to special offers, competitions and events of the An Post Group. You have the right to object to the use of your personal data for such purposes.
- (d) where necessary to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- (e) for any other reasonable purposes in connection with your employment notified in advance from time to time; and
- (f) where you have consented to our use for a particular purpose, such as deductions made from your salary by An Post on your request e.g. for Trade Union membership.

If you do give your consent for us to use your Personal Data for particular purposes, you have the right to withdraw your consent to our future use of your Personal Data for some, or all, of those purposes at any time by writing to your local HR Manager. In the case of deductions, An Post accepts no responsibility for any consequences which occur where you withdraw such consent.

When we disclose your Personal Data

We will not disclose your Personal Data except as outlined above and / or as follows:

- (a) where the disclosure is necessary to enable us to carry out our obligations under our employment contract with you;
- (b) to anyone providing a service to us or acting as our agents, which may include either other companies within the An Post Group or third party service providers, on the understanding that they will keep the Personal Data confidential;
- (c) where we need to share your Personal Data within the An Post Group or with our auditors, actuaries and our legal and other advisors, including mediators or investigators; and
- (d) if the disclosure is required by law or regulation, or court or administrative order having force of law, or is required to be made to any of our regulators.

We will not otherwise share your Personal Data with any third party unless we receive your prior written consent to do so.

Other Recipients of your Personal Data

In any case where we share your Personal Data with a third party data controller, the use by that third party of the Personal Data will be subject to the third party's own privacy policies. This includes areas such as where you consent for a payroll deduction for Trade Union membership, health insurance or credit union purposes.

Employees based in the EXO Building

CBRE are the owners of the EXO building and their Privacy Policy will apply to any personal data of An Post employees processed while they are entering and exiting the EXO building. This Privacy Policy can be found at <https://www.cbre.ie/about-us/global-web-privacy-and-cookie-policy>

International Transfers of Personal Data

Personal Data may be transferred outside of Ireland where necessary in connection with your employment, in accordance with your instructions, where you have explicitly consented, and / or as otherwise required or permitted by law.

Many of the countries will be within the European Economic Area (the “**EEA**”), or will be ones which the European Commission has approved, and will have data protection laws which are the same as or broadly equivalent to those in Ireland.

However, some transfers may be to countries which do not have equivalent protections, and in that case An Post shall use reasonable efforts to implement contractual protections for your Personal Data. While implementing such contractual protections will not always be possible, where we are required to transfer your Personal Data in order to comply with and perform our agreement(s) with you, or where we have a legal obligation to do so, any such transfers will be done in accordance with applicable data protection laws, including through the implementation of appropriate or suitable safeguards in accordance with such applicable data protection laws.

Special Categories of Personal Data

Under Article 9 of the GDPR Special Categories of Personal Data is defined as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

In the course of your employment, you may provide and we may collect and process Special Categories of Personal Data relating to you. Any such Special Categories of Personal Data will only be used and disclosed where necessary:

- (i) for the purposes of performing the employment contract between us (including undertaking an assessment of your capacity for work, where necessary)
- (ii) in fulfilment of our legal obligations or
- (iii) where you give us your explicit consent, to the extent any such consent is necessary to use and disclose the data concerned.

If you have previously expressly consented to the collection, use and disclosure of your Special Categories of Personal Data by An Post, you have the right to withdraw that consent at any time by writing to the Data Privacy Office at An Post, EXO Building, North Wall Quay, Dublin 1, D01 W5Y2; or privacyoffice@anpost.ie. This will not affect any use and disclosure of your Personal Data prior to the date you notify us of your change of mind.

Third Party Information

Where you provide us with Personal Data relating to other people, such as your spouse, children, advisors or other related persons, you represent and warrant that you will only do so in accordance with applicable data protection laws. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold information relating to them and that we may use it for any of the purposes set out in this Privacy Statement. Where necessary you will obtain their consent to our use of their information. We may, where required under applicable law, notify those individuals that you have provided their details to us.

Confidential Employee Assistance Program

An Post has put in place an employee assistance program with an agency called Spectrum Life. Any information that you share with Spectrum Life will be dealt with in the strictest confidence and will not be divulged to An Post.

You may agree to the An Post Occupational Health Services (OHS) and Spectrum Life sharing your health data but you must give your consent prior to any data sharing.

Post People App

The App is owned by An Post (“we “or “us”) and is being made available to An Post employees to enable you to access information relating to An Post when using your smartphone and or tablet device and or any other device which facilitates the use of the App.

The App does not track any user location data. On installation of the app, the user is not asked to give any location permissions, and the app does not natively interact with location trackers in any way.

By downloading the App, you do not disclose, nor do we collect personal information about you. However, when you first log-in to the App, you will be asked to give your mobile number as an additional security feature. This allows you to recover your account in the event that you forget your password. This additional security feature is optional and can be disabled at any time when you are logged into the App. An Post administrators will not have access to these mobile numbers. This additional security feature can only be accessed by you when you log into the App. We use Google Analytics to provide tracking information on how users interact with the App (e.g. how many users per day, time of visits, type of device used, etc). All of this technical data is completely anonymised and does not provide us with any personal data of users of the App.

Our app allows users to “like” or “comment” on certain content. In that instance your display name (first name + surname) is shown in the App, so any comments you make is identifiable as you.

If you upload any photographs onto the App you must get permission of any people within the photograph to upload their image. If you upload a photograph as a result of any competition or challenge, then we will only retain the photograph for as long as the challenge or competition is running.

Retention of Personal Data

We retain Personal Data for legitimate business purposes and are also obliged to retain certain employee information to ensure the accuracy of information provided for legal and regulatory purposes, for example Revenue and Social Welfare payments and pension entitlements.

We are also obliged by law to retain certain Personal Data for particular periods, as specified in employment and / or health and safety legislation, with the relevant periods varying between three and ten years.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by us or as required or permitted for legal and regulatory purposes and legitimate business purposes.

Your rights in relation to your Personal Data

Updating and correcting your Personal Data

If we hold incorrect Personal Data about you, you have the right to have the data amended. While we will use reasonable efforts to keep your Personal Data up to date, you will need to notify us without delay in the event of any change in your personal circumstances, so that we can keep the Personal Data up to date.

You can update your Personal Data by writing to your local HR Manager, or the Data Privacy Office at An Post, EXO Building, North Wall Quay, Dublin 1, D01W5Y2 or privacyoffice@anpost.ie with a description of the specific Personal Data you wish to have rectified.

Right of erasure

You have the right in some circumstances to have your Personal Data, which we hold, erased. If you request an erasure of your Personal Data, all your data will be erased subject to the following **important notice**.

We will not be required to erase your data where (i) to do so would prevent us from meeting contractual obligations to you as an employee, (ii) we are required to process (including retain) your Personal Data in order to comply with a legal obligation, or (iii) if the Personal Data is necessary to establish, exercise or defend our legal rights or for the purpose of legal proceedings.

Right of Access

You have a right to be given a copy of your Personal Data on request, subject to certain exceptions. To request a copy of your Personal Data, please contact Data Privacy Office at An Post, EXO Building, North Wall Quay, Dublin 1, D01W5Y2 or privacyoffice@anpost.ie.

Your Other Rights

You also have the right, in certain circumstances, to request restriction on the use, of your Personal Data, and to object to certain uses of your Personal Data. The right, in each case is subject to restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your Personal Data can be obtained by writing to us at the address set out under “Contact Us” below.

In any case where we rely on your consent to process your Personal Data, you have the right to change your mind and withdraw that consent. This right may be exercised in writing by contacting your local HR Manager, or the Data Privacy Office at An Post, EXO Building, North Wall Quay, Dublin 1, D01 W5Y2; or privacyoffice@anpost.ie.

Where we rely on legitimate purpose of ours, or of a third party recipient, in order to use and disclose Personal Data, you are entitled to object to such use or disclosure of your Personal Data. If you do so, we will cease to use and process your Personal Data for that purpose, unless we can show there are compelling legitimate reasons for us to continue to do so or that we need to use the Personal Data for the purposes of defending our legal rights or for the purpose of legal proceedings.

You have the right to lodge a complaint about our processing of your Personal Data with the Data Protection Commission at info@dataprotection.ie.

How to contact us in relation to your Personal Data

Any queries or complaints regarding our use of your Personal Data and / or the exercise of your individual rights should be addressed to the Data Privacy Office, An Post, EXO Building, North Wall Quay, Dublin 1, D01 W5Y2; or to privacyoffice@anpost.ie.

Policy Review

This Policy will be reviewed and updated at least annually by the An Post Data Protection Officer.

Last updated; December 2023

Appendix

The types of personal data relating to you as our employee which we may obtain and use include, but are not limited to, the following:

- personal identifiers such as your name, address, telephone number and photograph;
- financial or other identifiers such as your bank account details and PPS Number;
- personal details including physical description, physical and mental health record, disabilities, infirmities, racial or ethnic origin;
- current marriage or partnership, marital history, details of other family, household members;
- your immigration status;
- academic record, qualifications and skills, membership of committees or professional bodies;
- employment record including career history, recruitment details, current employment, work record, attendance record, training record, health and safety record, complaint, incident or accident details, termination details;
- membership of trade union or staff association membership, public offices held;
- details of any Court, tribunal or inquiry proceedings, including motoring or other convictions;
- business travel details;
- licences, permits held;
- security details;
- insurance details;
- pension details;
- agreements or contracts;
- any other personal information that you give An Post in connection with your employment, including information provided to comply with regulatory requirements; and
- any other personal information necessary for the conduct of the employment or other contractual relationship between us.