

**Confidentiality:**



## Information

# BU Nuclear Privacy Notice

<b>Bus. Entity</b>	BU Nuclear	<b>Date</b>	9/08/2023
<b>DPM</b>	Peter Van Rompaey	<b>Version nr</b>	1

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Template version ZNO.10010044675.000\_11

## 0 Reference

Document number	Title
ZST/ZNO.xxxxxxxxxxxx.xxx.xx	Enter the parent reference document

This document replaces the documents below:

Document number	Title
ZNO.10010776792.000_00	GOV/NSEC/30 Privacy notice - Nuclear Belgium specific processing's of Personal Data

## 1 Introduction

Present document is the Privacy Notice extension for “BU Nuclear” specific data processings applicable for every data subject that enters the perimeter of a Belgian Nuclear power plant.

The ENGIE Electrabel (Electrabel NV/SA, Boulevard Simon Bolivar, 36 - 1000 Brussels) Privacy Notice is aimed at informing you about which personal data are collected about you, why and how you can control these data. ENGIE Electrabel is the data controller responsible for the processing of your personal data and processes them in accordance with the legislation on the protection of personal data and electronic communications.

ENGIE Electrabel will process personal data about every data subject that enters the perimeter of a Belgian Nuclear power plant.

This privacy policy is effective as of 25th of May 2018. We review our privacy practices on an ongoing basis, and as such we may change this privacy policy from time to time. If such change includes any significant, material changes, we will provide clear notice of the update on the homepage of our website. Please check this policy frequently to ensure that you are familiar with its current content.

ENGIE Electrabel has appointed a Data Protection Officer (DPO) to the Belgian Data Protection Authority (Commission for the protection of privacy), whom you can contact by email [data.protection.be@engie.com](mailto:data.protection.be@engie.com), if you would like additional information on anything in or related to this privacy policy, or you would like to exercise any rights that you may have in relation to your personal data. You may exercise these rights via our website [www.engie-benelux-privacy.com](http://www.engie-benelux-privacy.com) or by sending a letter with a copy of your identity card or another proof of identity to

Postbus Engie Attn. T&G Data Protection team,  
Simon Bolivarln 36,  
B-1000 Brussels.

## 2 How will ENGIE Electrabel protect your personal data?

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ENGIE Electrabel treats your personal data as confidential information.

We have implemented security policies and technical measures to protect the personal data that we collect, consistent with applicable privacy and security laws. These security measures are designed to prevent unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss of your personal data.

We update and test our personal data privacy and security measures on an ongoing basis. We also provide training to our employees on privacy laws and how to comply with them. We ensure that only employees who need to know your personal data to fulfil the purposes of processing that personal data (as described in this ENGIE Electrabel Privacy Notice) have access to it.

### 3 What personal data does ENGIE Electrabel process?

The personal data collected and processed by ENGIE Electrabel about every data subject that enters the perimeter of a Belgian Nuclear power plant belong to one or more of the below types of personal data:

- **Identity (surname, first name, maiden name, company, title, etc.):**  
This data is collected from the Human Resources services for internal staff or straight from external staff.
- **Personal contact details (home address, home telephone number(s), etc.):**  
This data is collected from the Human Resources services for internal staff or straight from external staff.
- **Online tracking data (User ID, etc.):**  
This data is collected from the Human Resources services for internal staff or straight from external staff.
- **License plate:**  
This data is collected from the Human Resources services for internal staff or straight from external staff.
- **Time and access registration:**  
This data is collected straight from internal and external staff through badge scanners.
- **Competences (certificates, competences, language, qualifications, etc.):**  
This data is collected straight from internal staff or from the contractor company for external staff.
- **Social security number (INSS):**  
This data is collected from the Human Resources services for internal staff or straight from external staff.
- **Financial information (bank account number):**  
This data is collected from the Human Resources services for internal staff or straight from external staff.
- **Security clearance, access permit, safety certification, social law & work permit:**  
This data is collected before it is sent to the authorities.
- **Picture and video material:**  
This data is collected straight from surveillance cameras.
- **Special categories data (biometric data and health certificates):**  
This data is collected straight from internal and external staff through biometric scanners and from the services for prevention and protection at work.
- **Criminal record:**  
These data are collected by the Human Resources Recruitment Office and/or by the Security Officer for security screening reasons.

Some of the processed personal data may originate from sources accessible to the public (e.g., public social media profile or posts, published articles...).

## 4 Why does ENGIE Electrabel process your personal data?

ENGIE Electrabel might process personal data about all data subject that enters the perimeter of a Belgian Nuclear power plant to achieve the below purposes:

- Ensure nuclear site security. Examples of processings include:
  - uniquely identify each data subjects entering the perimeter of a Belgian Nuclear power plant
  - control if data subjects gained the minimum knowledge requirements about security and safety rules that need to be observed in the perimeter of the nuclear power plant
  - control surveillance cameras recordings
  - perform audits, fraud monitoring and prevention to ensure nuclear site & asset security
- Manage health & safety obligations amongst staff members. Examples of processings include:
  - submit accident reports in case of injured staff (Electrabel NV/SA employees or contractors)
  - control healthcare requirements for each position of Electrabel NV/SA employees, prior to the execution of activities on-site
- Manage the Emergency Plan. Examples of processings include:
  - ensure the on-call duty service amongst staff members
  - maintain the automatic calling system which is triggered in case of emergency
- Manage Human Resources. Examples of processings include:
  - invite staff members with their family to ensure social well-being
  - provide a centralized address book to easily contact staff members
  - work with workforce forecasting tools
  - in-depth security screening of Electrabel NV/SA employees which want to apply for another position with a strong connection to the nuclear environment
- Follow-up radiation protection legal requirements. Examples of processings include:
  - follow-up and communicate dosimetry information (radiation doses) to authorities and staff members occupationally exposed to radiation
  - control qualification certificates of staff members occupationally exposed to radiation
- Manage contractor activities. Examples of processings include:
  - Track, consult and encode (nuclear) certificates and qualifications of contractors
  - Facilitate contractor's invoicing with proactive registration of every activity duration
  - Control presence and accesses logins and logoffs of contractors related to work assignments
  - Link work order with borrowed tool and employee to track if all tooling is brought back
- Manage insurance claims handling
- Organize staff (internal & external) work schedules for overhaul and maintenance operations
- Follow-up the status of tooling borrowed by staff members (internal & external)
- Manage and follow-up individual development plans to track qualification requirements according to the function
- Manage competence and knowledge requirements for each position of Electrabel NV/SA employees
- Manage distribution of internal and external mailing on site
- Use live communication channel to inform employees about events happening in Belgian Nuclear power plants
- Assess operators during certification examination for work authorizations

- Monitoring and assessing compliance with our policies and standards

## 5 Who has access to your personal data?

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The personal data collected may be provided to contractors as data processors to perform activities on request of the data controller for the mentioned purposes.

We may use or disclose your personal data for the mentioned purposes as we deem necessary or appropriate under applicable laws; to respond to requests from public, governmental; and regulatory authorities; to comply with court orders litigation procedures, and other legal processes; to obtain legal remedies or limit our damages; to protect the operations of our group entities; and to protect the rights, safety, or property of our employees, you, or others.

Personal data may be transferred internally within ENGIE Electrabel, as stated by the Binding Corporate Rules.

## 6 Transfer of personal data to countries outside the European Economic Area (“EEA”)?

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If we cooperate with third parties established in countries outside the EEA that do not provide an appropriate level of protection for your personal data, we will impose contractual obligations on them, approved by a competent authority and offering an appropriate level of protection of your personal data.

## 7 On what legal basis does ENGIE Electrabel process your personal data?

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We only process your personal data when:

The processing is necessary to perform a contract (for example, collect and process identification data to grant access on Belgian Nuclear power plants to contractors);

The processing is necessary for the legitimate interest of ENGIE Electrabel (for example, to further our business purposes, such as performing data analysis, audits, fraud monitoring and prevention; and operate and expand our business activities);

You have given your consent (for example, to receive sms notifications about events happening on Belgian Nuclear power plants). In this case, you can always withdraw your consent; and

The processing is necessary to comply with our statutory or regulatory obligations (for instance within the scope of judicial inquiries or requests for information of public authorities).

## 8 How long does ENGIE Electrabel retain your personal data?

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The personal data collected and processed by the controller, ENGIE Electrabel, will be archived no longer than necessary for the purposes for which they are collected. The retention period may thus differ according to the purpose (e.g.: retention period of 30 days for picture and video material captured by the video surveillance system, etc.).

## 9 What rights do you have related to your personal data?

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Under certain conditions, you will benefit from the following rights with regard to your personal data collected by ENGIE Electrabel:

- The right of access to, rectification or erasure of your personal data;
- The right to oppose the processing or to obtain a limitation of the processing;
- The right to receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format and to communicate them to another controller;
- The right to withdraw your consent at any time, for example to stop receiving sms notifications about events happening on Belgian Nuclear power plants.

You may exercise these rights via our website [www.engie-benelux-privacy.com](http://www.engie-benelux-privacy.com) or by sending a letter with a copy of your identity card or another proof of identity to:

Postbus Engie Attn. T&G Data Protection team,  
Boulevard Simon Bolivarln 36,  
B-1000 Brussels.

The mentioned rights cannot give rise to other rights than those specified in this Privacy Policy or stipulated by the applicable legislation relating to the protection of personal data. Note that the exercise of the mentioned rights may have as a consequence that ENGIE Electrabel can no longer fulfil its contractual obligations.

If you have a complaint concerning the processing of your personal data, you may contact us on the above address or contact the Data Protection Authority [www.dataprotectionauthority.be](http://www.dataprotectionauthority.be).

## 10 Supporting and Auxiliary Documents

Document number	Title
ZST.10011145497.000	Operational Procedure - Personal Data Protection in BU Nuclear

## 11 Justification for Modification

Version nr	Reason for modification	Changed pages
00	New document	-
01	Update layout and adapt to regulation evolution on identity identification. Metadata classification code and business review: GOV/SECIA/30(GOV/NSEC/30)	All