

Personal Data Policy

Handling of personal data about users, suppliers and business partners at Port of Hirtshals.

This policy is part of Port of Hirtshals' overall documentation that the port complies with the applicable personal data legislation. The documentation material consists of an overall information security policy and several underlying guidelines, and this policy thus constitutes the part of the overall material that documents the correct processing of personal data about customers and business partners. The policy has been drawn up and applies to Port of Hirtshals and Hirtshals Havn Drift of Ejendomme A/S (the port's operations and properties).

The collection and processing of personal data, including sensitive personal data, is always carried out in accordance with the applicable personal data legislation at any time, and the port only processes personal data if the port has a basis for this. In addition, the port is aware that it may only process the personal data that is necessary to achieve the purpose, just as this may only be passed on to third parties, if there is a separate and factual basis for this.

The port is also aware that it is necessary to take several organizational and technical security measures to protect personal data against unauthorized disclosure, manipulation, or deletion. The security measures are described and regulated in the port's IT security policy.

1.1 Data controller

The port is considered the data controller for the collected personal data about users, suppliers, and business partners. Below are all relevant contact details:

Name: Port of Hirtshals and Hirtshals Havn Drift og Ejendomme A/S (the port's operations and properties).
Address: Norgeskajen 11
CVR no.: 25 86 84 55 and 38 56 84 18
Email: info@portofhirtshals.dk

Port of Hirtshals' information security committee consists of the deputy director and the technical manager. All inquiries regarding this policy or the port's handling of personal data must be addressed to the information security committee.

Data protection advisor

The port is obliged to appoint a data protection adviser. Port of Hirtshals has appointed the following as data protection adviser:

Name: Lawyer Karina Søndergaard

Contact Info: KSO@70151000.dk

2. Introduction

As part of the daily work at Port of Hirtshals, the port processes several personal data about users of the port's facilities, suppliers and business partners. The port is therefore also very aware of processing all personal data in a confidential and secure manner. In this policy, you can read more about the guidelines for how we process personal data about the actors who use the port's facilities, make deliveries to the port, or with whom we otherwise collaborate with.

The port's processing of personal data meets the requirements applicable at all times, including security requirements, which follow from personal data legislation. The port regularly reviews the registered personal data and deletes the personal data that is no longer relevant to process. The same applies to personal data that a registered person wants deleted and that the port no longer has any basis for processing.

We collect a range of personal data when you rent areas from us, use the port's facilities, enter into agreements with us, sign up for our news service or contacts us via e-mail, telephone or on our various pages on the internet, including our Facebook page. The information is necessary so that we can comply with the obligations incumbent upon us as the port authority, administer the agreements entered into, collect payment or simply respond to your inquiry.

3. Processing of personal data and the purpose thereof

3.1 When receiving inquiries

When you contact us via e-mail, our website or via social media, we process the personal data that appears in your inquiry. For example, if you contact us via Facebook, we will – via Facebook – receive certain information about you in the form of your name and a picture. We generally respond to your inquiry on the same media that you contacted us on.

When you contact us by telephone, we will – if relevant note down your name and the purpose of inquiry. We do this in order to have the opportunity to follow up on this- and to be able to document the inquiries

we receive from our customers. You should therefore be aware that, in some cases, we note down the relevant conditions you inform us by telephone in our system.

The legal basis for our processing of your personal data in these cases is the data protection regulation art. 6 pieces. 1, letters b and f.

We encourage you not to send us any sensitive or confidential personal data via e-mail, Facebook or our website, e.g., cpr. no., account information or health conditions.

3.2 Rent of areas

When you rent an area from us, we register a number of different personal data about you based on the information you provide to us yourself.

As part of entering into a rental agreement, we process the following information about you:

- Name and address
- Email address
- Phone number
- CVR no. (not personal information)

If you are a trader and do business with us, we usually register a specific contact person in our system. In addition, we will note down if your company/contact person has any specific interest or wishes in relation to our products.

The collected personal data is included in the contracts we enter into with you, and you will be given a copy of this. We keep all the relevant documents, including the lease, for the duration of the tenancy. In addition, we register you in the port's debtor register (read more about this below).

The port collects and registers the above mentioned personal data in order to manage the concluded agreement, collect rent and send you service messages and other relevant information in connection with the agreement. The legal basis for the processing is the data protection regulation, Article 6, subsection 1, letter b.

Our electronic data is stored with an external IT supplier. The physical documents we handle are stored in

the relevant department at the port in locked rooms. Our handling of your personal information takes place separately from all other matters, and only employees who are authorized to do so have access to the relevant personal data.

3.3 Handling of information about persons on board ships, including crew lists

We maintain a ship register at Port of Hirtshals, as we are obliged to document which ships use the facilities of Port of Hirtshals.

In this ship register, we register the following personal data

- Skipper's/captain's name, if this is disclosed to us
- Broker's name and contact details
- Name and contact details of the ship's owner (if there is no broker)

The purpose of storing this information is to be able to comply with the applicable safety regulations and requirements for documentation of the port's activities, as well as to be able to handle the ship's arrival and invoice the service. The legal basis for the processing is the data protection regulation, Article 6, subsection 1, letter c.

3.4 Handling of personal data in connection with making payments

At Port of Hirtshals, we have created a debtor register which contains the name, address, telephone number and e-mail/fax number of all our debtors. If the debtor is a company, we will typically register the company's name and contact information, but there may also be a contact person linked to the debtor.

All the information is registered in our financial system, and we only use it to settle for the agreed services. The legal basis for the processing is the data protection regulation, Article 6, subsection 1, letter b.

3.5 Handling of participants at events

If Port of Hirtshals hosts an event where registration is necessary, we process contact information about the participants in the event in the form of their name, where they work/title and email address. We naturally do this in order to be able to handle the registrations for the event.

If you participate in an event, you should be aware that in some cases we take situational photos of participants and share them on our website and/or social media. The purpose of this is to brand the events we hold and the port. If you do not wish to be included in any situational photos, you can simply inform us of this at the start of an event. The legal basis for the processing is the data protection regulation, Article 6, subsection 1, letters b and f.

3.6 Handling of Personal Data in Relation to Time Registration

Port of Hirtshals requires for all employees to register their daily working hours due to a legal requirement introduced in 2024 mandating the recording of working hours. Due to this requirement, we have implemented an IT system where working hours must be registered. When we process information about employees' working hours, we handle general personal data, including name, role, working hours, and any reasons for absence (e.g. vacation, sick leave, etc.) or deviations from normal working hours. The legal basis for processing this data can be found in the Danish Data Protection Act, Section 12 and Article 6 subsection 1, part c of the General Data Protection Regulation (GDPR), which permits the processing of personal data necessary for administering your employment and fulfilling the legal obligation.

To comply with GDPR, it is essential that you do not, under any circumstances, specify the reasons for deviating from normal working hours beyond the pre-defined options available when registering absence in the time registration system. For example, you must not record health information in connection with sick leave in the system.

We retain all time registration records for five years after their creation, as required by applicable regulations about the recording of working hours.

As your employer, when we process your personal data, you have certain rights. These are detailed in the applicable privacy policy, and you are therefore referred to the section on data subjects' rights therein.

3.7 Other conditions

3.7.1 TV-surveillance

You must be aware that TV surveillance is carried out on the port's premises. We do this for security and crime prevention reasons. TV surveillance takes place in accordance with the rules of the TV Surveillance Act. There are signs with the surveillance in all those places, and only the relevant people at the port have

access to the video recordings. The recording will only be reviewed if criminal matter or other security incidents are suspected.

The port carries out TV surveillance of the following areas

- The port entry
- Vesthavnen (West port)
- Tværmolen (the cross pier)
- At the entrance to the port office
- Mellembassin 2 (Middle basin 2)
- Østbassin 1 and 2 (East Basin 1 and 2)
- Sildekajen (the herring quay)
- Tværkajen (The cross quay)
- Nordsøterminalen (The North Sea Terminal)
- Norgeskajen (Entry and foreport)
- Notkajen (the dock)
- Color Line terminal area
- Fisketerminal Hirtshals (Fishing Terminal – both inside the building and outside the building)
- Fjord Line terminal area

The TV surveillance is active 24 hours a day. The area is signposted with information about the surveillance. The port has taken security measures so that the recordings are protected against unauthorized access. Recordings that do not give rise to specific suspicions of criminal matter are deleted after 30 days.

If a criminal offence is detected, report this to the police and the recordings will be passed on to them for further investigations. When the investigation is completed or the police request this, the port deletes the recordings.

In addition, there is a single camera at the port which points towards the entrance (northern direction), where live streaming takes place via the port's website. Here the recording is shown live.

3.7.2 Use of the port's network

A wireless network has been established at all Port of Hirtshals' locations.

Guests whose identity is known by the port can be provided with a password for the guest network and connect their own equipment to the network, provided that the equipment does not disturb other systems. The network can and must only be used for internet access – direct access to internal systems is not permitted from the guest network.

In addition, there is an open community network that works in the area of the port. Guest's use of this network is monitored and logged in accordance with EU counter-terrorism regulations.

4. Termination of the tenancy and storage period

The Personal Data Act does not contain rules on when personal data must be deleted. This must be decided by us as data controller in the individual situation. When assessing this, particular emphasis must be placed on whether continued storage of the personal data serves a legitimate purpose, or whether we are obliged by law to store certain information or documents.

The port has assessed that it constitutes a legitimate reason for storage that we can document the history in connection with the rental, including that we have the opportunity to see what steps have previously been taken in relation to you as a customer. The personal data we use to manage your tenancy will therefore only be deleted in accordance with our current deletion policy after the tenancy has ended. We store your rental contract and other agreements or correspondence which are linked to the concluded agreement for 5 years after the customer has ceased to be a customer. We do this for the sake of compliance with the Bookkeeping Act's storage requirements and to be able to document the agreements entered into.

In addition, we always store all bookkeeping material for 5 years from the end of the financial year in which the bookkeeping took place. We also do this to comply with the retention requirements of the Bookkeeping Act.

In relation to the ship register, we store the information therein as long as we are obliged to do so according to the applicable storage rules. In some respects, we are also obliged to pass on this information to the historical archive.

However, we do not delete personal data if it is necessary to establish or defend a legal claim, e.g. if a dispute arises or as a dispute of financial outstandings between the port and the client/collaborating partner.

5. Security, transfer or disclosure of personal data

The port treats your personal data confidentially, and we have also implemented several technical and organizational security measures with the aim of protecting your personal data against accidental or illegal destruction, loss or deterioration, as well as against it coming to the knowledge of unauthorized persons, being misused or otherwise processed in violation of person data legislation.

In addition to having access to your personal data, the port has also granted access to a number of data processors. For example, we use data processors in connection with operational and IT security tasks (e.g., backup, website, hosting etc.), which we solve externally. The establishment of access to your information is therefore solely due to the data processor delivering a technical or system-related service to us or providing operational support and troubleshooting within the framework set by the port. Storage of or establishment of access to the information by the data processors is subject to a number of rules, and data processing agreements have therefore been entered into with all data processors, which must, among other things, ensure an appropriate level of security, including that your information does not fall into unauthorized hands.

We treat all information confidentially and do not pass it on to third parties unless we have a special basis for this. Examples of the fact that we may be required to pass on personal data about you may be the passing on of TV surveillance to the police for the purpose of preventing and solving crime, or the passing on of the relevant personal data to our lawyer or accountant in connection with the processing of legal disputes of the preparation of annual accounts. We also pass on personal information to public authorities, if we are obliged to do so pursuant to the applicable legislation, or if this is done in order to establish or defend a legal claim.

6. Your rights

You have a number of rights against us as a result of us processing your personal data. You can read more about this below, but you are also welcome to contact us if you have any questions about this. We endeavour to answer all inquiries as quickly as possible and within 30 days at the latest. If we do not comply with your request in accordance with the points below, you have the opportunity to complain to the Danish Data Protection Authority.

6.1 Rights to access your own personal data

You have the right to be informed about which personal data we process about you. A request for access must be addressed to us and does not need to be justified. In other words, this means that you have the right to be told what personal data we process about you in connection with our administration of the rental relationship, what the purpose is, where we have the information from, how long we store it, and with whom we may share them.

6.2 Right to have incorrect personal data corrected

If the port processes incorrect or misleading personal data about you, you have the right to request us to correct the data. On receipt of such a request we decide whether the information must be corrected.

6.3 Right to erasure

In some cases, we are obliged to delete your personal data. This applies if we no longer have a legitimate purpose for processing the personal data, if consent is revoked, if the personal data has been processed illegally, or it must be deleted to comply with a legal obligation and in some cases if an objection is made to the treatment. These rights have been taken into account when determining the port's deletion policies.

6.4 Right to object

You have the right to object to our processing of your personal data at any time. If we receive an objection from you, we assess whether we should limit the processing of the personal data until we have checked whether his legitimate interests take precedence over the interests of the customer.

6.5 Data Portability

In some cases, you have the right to have your personal data handed over in a commonly used and machine-readable format, so that it can be used for passing on to another data controller. If it is technically possible, we can also transmit the information directly to the new data controller.

6.6 Withdrawal of consent

If you have given us consent in relation to the processing of your personal data, you can always revoke this. We will then stop processing the personal data to which the consent relates if there is no other legal basis for processing the personal data.

6.7 Complaints instructions to the Data Protection Authority

If you have objections to our processing of your personal data, we encourage you to contact us. However, you also always have the right to complain about our processing and storage of personal data to the Data Protection Authority. The Data Protection Authority's contact details can be found at www.datatilsynet.dk.