



# PRIVACY POLICY (EXTERNAL)



**PORT OF FREDERIKSHAVN**

# HANDLING OF PERSONAL DATA FOR PORT OF FREDERIKSHAVN

This policy is part of Port of Frederikshavn's overall documentation proving that the company complies with the existing privacy policy legislation. This policy is thereby the part of Port of Frederikshavn's overall GDPR documentation, which documents correct handling of personal data on the company's users/customers, suppliers, and business partners.

Port of Frederikshavn always handles personal data in accordance with the applicable privacy policy legislation, and Port of Frederikshavn only handles personal data, if the company has a reason to do so. Furthermore, Port of Frederikshavn is aware that they may only handle the personal data necessary to achieve the purpose, and that these can only be transferred to third party, should there be a particular and objective reason to do so.

Port of Frederikshavn is furthermore aware that it is necessary to take action on a number of organizational and technical safety measures in order to protect personal data against unjustified transfer, manipulation or deletion. The safety measures are described and regulated in Port of Frederikshavn's IT policy.

## ■ DATA CONTROLLER AND DATA PROTECTION OFFICER

Port of Frederikshavn is considered data controller for the collected personal data on users/customers, suppliers, and business partners. Below is the relevant contact information:

Port of Frederikshavn  
Oliepieren 7, 9900 Frederikshavn  
Tel: +45 96204700  
E-mail: [info@pof.dk](mailto:info@pof.dk)  
CVR-No. 35431926

Port of Frederikshavn has designated a Data Protection Officer (DPO).  
You will find contact information on DPO below:

Name: Karina Søndergaard (Law firm HjulmandKaptain)  
Tel: +45 72211685  
E-mail: [dpo@pof.dk](mailto:dpo@pof.dk)

## HANDLING OF PERSONAL DATA

As part of the daily work at Port of Frederikshavn, the company handles a number of personal data on the users of Port of Frederikshavn's facilities, suppliers, and business partners. Port of Frederikshavn is therefore also very attentive to handle all personal data confidentially and safely. In this policy you can read more about the guidelines on how we handle personal data on actors, who use the facilities at Port of Frederikshavn, render delivery to us or we somehow cooperate with.

Port of Frederikshavn's handling of personal data meets the applicable demands of the data protection legislation at any time. Port of Frederikshavn regularly goes through the registered personal data and deletes the personal data no longer relevant to handle.

### ■ UPON RECEIPT OF INQUIRIES

When you contact us by e-mail, our website or on social media, we handle the personal data, which appear in your inquiry. Should you for example contact us through Facebook, we will – through Facebook – receive certain information on you, such as your name and a photograph.

When you contact us by telephone, we will – if relevant – note your name and purpose of your inquiry. We do this to be able to follow up on your call and to document the inquiries we have received from our customers/users. You shall therefore be aware that we sometimes note the relevant conditions you inform us by telephone, in our system.

We encourage you not to send us any sensitive or confidential personal data by e-mail, Facebook or our website, for example social security number, account numbers or health conditions. It will seldomly be necessary for us to handle this type of information, to handle your inquiry.

### ■ AREA LEASE

We collect a number of different personal data, when you lease an area from us, based on the information you have provided us with.

We handle the following personal data on you when entering a lease agreement with you (the contact person in dialogue with us or the one who signs the lease contract):

- Name and address
- E-mail address
- Telephone number

If you are a company and you do business with us, we often register a contact person in our system. Furthermore, we will register if your company/contact person has any specific interest or wishes in relation to our products and services.

The gathered personal data is part of the contracts we enter with you, and you will receive copy

of this. We file all the relevant documents, including lease contract during the entire leasing period. Furthermore, we register you in our debtor system (read more below).

Port of Frederikshavn gathers and registers abovementioned personal data to administer the entered agreement, collect rent and send you service notifications and other relevant information with connection to the agreement.

Our electronic data is filed at an external IT-supplier. The physical documents, which we handle, are filed in the applicable department at Port of Frederikshavn in locked up facilities. Our handling of your personal data is done separate from other matters, and only employees authorised hereto, have access to the relevant personal data.

## ■ HANDLING OF DATA ON PERSONS ON BOARD VESSELS

In most cases we gather data on the vessels calling the port, as we are obliged to document which vessel use the port's facilities.

In this connection we register the following personal data:

- Master/Captain's name (if this is informed)
- Agent's name and contact information
- Owner of the vessel's name and contact information (if there is no agent)

The purpose of filing this data is to comply with applicable safety regulations and demands on documentation of the port's activities, and to handle the calling of the vessel, and to invoice the service.

## ■ HANDLING OF PERSONAL DATA WHEN EXECUTING PAYMENT

At Port of Frederikshavn we register all our debtors in a system. We always register name, address, telephone number and e-mail address on all our debtors. If the debtor is a company, we will typically register the name of the company and contact information, however a contact person can also be connected to the debtor. All data is registered in our finance system, and we use them only to administer the agreement and invoice the services agreed upon.

## ■ HANDLING OF PARTICIPANTS AT EVENTS

If Port of Frederikshavn hosts an event, where it is necessary to sign up, we handle the contact information on the participants in the event, such as name, place of work/title and e-mail address. We do this to handle the sign-ups for the event.

If you participate in an event, you must be aware that we on some occasions take photographs of the event and share them on our website and/or social media. The purpose is to brand the port and the events we host. If you do not wish to be in possible situation photographs, or if there are photographs you wish to have removed, please inform us at the beginning of the event or contact us afterwards.

## ■ SIGN-UP FOR NEWSLETTER

If you sign up for our newsletter, we handle your e-mail address. We do this based on your consent to send you newsletters.

Please be aware that we use an American supplier in connection with administering our newsletter solution and storage of your personal data, where a third-party transfer of your personal data takes place. In connection with the transfer, by default we use the EU commissioning's standard contract regulations (SCC) as transfer foundation. We can add that the supplier is certified according to EU-US Data Privacy Framework, which can also be used as transfer foundation.

You can always withdraw your consent by contacting Port of Frederikshavn's GDPR coordinator (Maria Hyttel, e-mail mh@pof.dk) or by using the unsubscribing link at the bottom of the forwarded newsletters. If you withdraw your consent, we delete you from the list of newsletter recipients.

## ■ VIDEO SURVEILLANCE

You must be aware that the area of Port of Frederikshavn has video surveillance. We do this for safety and crime preventive reasons. All the areas with video surveillance are marked with signs, and it is only the relevant people at the company, who have access to the video recordings. The recordings will only be examined if punishable circumstances or other safety incidents are suspected.

Video surveillance is active 24 hours a day. Recordings, which do not form concrete suspicion of punishable circumstances, are deleted after 30 days. When establishing a punishable action, it is reported to the police, and video surveillance is handed over for further investigation. When the investigation is ended, or the police requests so, the company will delete the recordings.

Port of Frederikshavn makes video surveillance on the entire area of the port and especially by the following buildings/areas:

- Port office
- All the port's quays
- All the port's gates
- Ferry harbour

Please be aware that video surveillance is carried out in cooperation with an American supplier, where a third-party transfer of your personal data takes place. In connection with the transfer, by default we use the EU commissioning's standard contract regulations (SCC) as transfer foundation. We can add that the supplier is certified according to EU-US Data Privacy Framework, which can also be used as transfer foundation.

## ■ USE OF PORT OF FREDERIKSHAVN'S NETWORK

Wireless network has been established on several locations at Port of Frederikshavn. Guests, whose identity is known by the company, can have the access code for the guest network at the port office and connect own equipment to the network, provided that the equipment does not interfere with 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.

## ■ SOCIAL MEDIA

Port of Frederikshavn has a business profile on both Facebook, LinkedIn and YouTube. Port of Frederikshavn and provider of these social media are both data responsible for handling of your collected personal data in connection with your visit on Port of Frederikshavn's profiles or sites on the specific social media. Below are the links to the providers' privacy policies, which describe their handling of personal data. Port of Frederikshavn cannot be held liable for the providers' possible lack of update of privacy policies or other failure to comply with existing legislation.

Facebook (Meta Platforms Ireland Ltd.)  
[Facebook's privacy policy is available here](#)  
[You can adjust your privacy settings on Facebook here](#)

LinkedIn (LinkedIn Ireland Unlimited Company)  
[LinkedIn's privacy policy is available here](#)  
[You can adjust your privacy settings on LinkedIn here](#)

YouTube (Google Ireland Limited)  
[YouTube's privacy policy is available here](#)  
[You can adjust your privacy settings on YouTube here](#)

When you visit or in any other way interact with our company profile on the social media, Port of Frederikshavn and provider can collect, handle, and store the following type of personal data on you:

- Information about you visiting our site/profile
- Information available on your profile, including name, sex, civil status, workplace, interests and your city
- If you have used reactions on our profile, such as "Like"
- Content in comments you leave on our posts, also replies to others' comments on our posts

Port of Frederikshavn treats your personal data for the following purpose:

- Improve our company profile and sites on social media
- Statistics and analysis
- In order to communicate with you, if you communicate on a post or file a claim

Providers of the social media handle your personal data, amongst others, for the following reasons:

- Improving of their advertisement system
- To give Port of Frederikshavn statistics, which provider of the social media amongst others elaborate from your visits on our profiles and sites
- Advertisement and adjustment of activities on the site

Above list of provider's reasons is not exhaustive and further information on purpose of handling can be found in the respective social media's privacy policies.

Port of Frederikshavn's handling policy for handling your personal data in connection with our company profile / site on social media is our legitimate interest in communicating with you and our legitimate interest to improve our products and services according to the data protection legislation article 6, item 1, litra f.

The provider's handling policy for handling your personal data is their legitimate interest, amongst others, to improve their advertising system, deliver statistics to Port of Frederikshavn and deliver more accustomed and focused activities and advertising on the social media according to the data protection legislation article 6, item 1, litra f.

The provider of the social media also handles a number of personal data pursuant to the consent you have given in connection with establishing your profile on the social media. The handling policy is in this connection the data protection legislation article 6, item 1, litra a. In this connection you must be aware that you are allowed to withdraw your consent at any time. You can read more about the consent and which personal data are handled in conformity with this, in the privacy policy for the respective social media.

Port of Frederikshavn is not responsible for deleting comments, posts and other content, which you have posted or written. It is therefore your responsibility to delete this content. In this connection, it is recommended that you contact the provider of the social media in question, who can refer you to how such deletion is carried out.

## TRANSMISSION AND ENTRUSTING OF DATA

Apart from Port of Frederikshavn having access to your personal data, on some occasions we also hand over the handling of personal data to a number of data processors. For instance, we use data processors in connection with the operation- and IT safety assignments (i.e., backup, hosting of website, etc.), which are solved externally. Establishment of accesses to your data is therefore only due to the data processor delivering a technical or system service to us, granting support on the operation or doing troubleshooting within the frames, Port of Frederikshavn has set up. Filing or establishment of access to the data, at the data processor, is subjected to several rules and a data processor agreement has therefore been agreed upon with all data processors, who shall amongst others ensure a suitable safety level, including that your data does not reach irrelevant party.

We treat all data confidentially and do not entrust it to third party, unless we have particular reason to do so. Examples of us being obliged to transfer your personal data, could be transfer of video surveillance to the police, which is done with the intention of preventing or solving crime, or transfer of relevant personal data to our lawyer or auditor in connection with handling of legal disputes or elaboration of annual reports. We furthermore transfer personal data to official authorities, should we be obliged to do so pursuant to the applicable legislation, or this is done with the purpose of establishing or defending a legal claim.

## RETENTION PERIOD

Port of Frederikshavn has set a number of deletion procedures for the personal data, the company handles. The retention period/deletion procedure, however, depends on the kind of personal data, the company handles. When evaluating the retention period, we namely emphasise on whether a continued retention of the personal data fits a pertinent purpose or if we are obliged due to legislation to retain certain information or documents. Apart from this, we emphasise on whether the information has a historic or documentational value to the company.

According to the Danish Bookkeeping Act, all information connected to accounting and invoicing must be filed for 5 years after closure of the reporting year, which the document is related to.

The company is furthermore submitted to a number of public legislations, which can also be significant for the retention period, as the company will be obliged to archive and file data, which is part of the company's operation and function.

The employees at the company are instructed to continuously obey different deletion procedure, which ensure that personal data is not retained for longer than necessary.

# YOUR RIGHTS

## ■ HANDLING OF REQUESTS

By default, Port of Frederikshavn has 1 month to reply to requests about the use of the registered's rights according to the data protection regulation. Should a request of acceptance of the use of rights be rejected entirely or partially according to the data protection regulation, we shall always substantiate this, and in such case, you can make a claim on the rejection to the Danish Data Protection Agency. For more information on the claim process, read more below.

## ■ RIGHT TO INSIGHT IN OWN PERSONAL DATA

You have the right to be informed of the personal data we handle on you. In other words, this means that you have the right to know which personal data we handle on you in connection with our administration of the tenancy, which is the purpose hereby, where we have the data from, for how long we file it, and who we possibly share it with.

## ■ RIGHT TO HAVE INCORRECT DATA CORRECTED

Should we handle incorrect or deceptive personal data on you, you have the right to request that we correct this data.

## ■ RIGHT TO DELETE

We are in some cases obliged to delete your personal data before the normally established time to do so, according to the general deletion procedures.

## ■ RIGHT TO MAKE OBJECTION

You have the right to object to our handling of your personal data. Should we receive an objection from you, we evaluate if we shall limit the handling of the personal data, until we have controlled if its legitimate interests are more relevant than those of the customer.

## ■ DATA PORTABILITY

In some cases you have the right to have your personal data handed over in an ordinary and machine readable format, to be used to transfer to another data controller. If it is technically possible, we can also transmit the data directly to the new data controller.

## ■ WITHDRAWAL OF CONSENT

Should you have given us a consent to handle your personal data, you can always withdraw this consent.

## ■ CLAIM PROCESS

Should you wish to file a complaint on Port of Frederikshavn's handling of your personal data, you can do so through the Danish Data Protection Agency, located at Borgergade 28,5., 1300 Copenhagen, telephone +45 33 19 32 00, e-mail address: dt@datatilsynet.dk.