



PRIVACY NOTICE (UK)

The CLdN group company with which you are in contact (hereinafter the “**Company**” and also referred to by “**we**”, “**our**” or “**us**”), is the data controller responsible for your personal data. We collect and process your personal data when you visit our website, use our services or engage with us in other ways.

This Privacy Notice explains what personal data we collect, why and how we collect it, how we protect it and how long we retain it. We are committed to safeguarding your personal data and protecting it from loss, unauthorised access, or disclosure.

We handle your personal data in strict compliance with **applicable** data protection legislation, including the retained EU law version of the General Data Protection Regulation 2016/679 of 27 April 2016, the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426) and all other relevant national data protection legislation (hereinafter the “**UK GDPR**”).

This Privacy Notice follows a Question & Answer structure and should be read alongside the [Privacy Policy](#).

1. What data do we collect about you?

The categories of personal data about you that we collect, use, store and transfer depends on our relationship but may include:

- information about your identity (first name, last name, any previous names, title, date of birth, place of birth, gender)
- ID and national identification numbers
- copies of identification or other official documents
- your signature
- data related to your employment/employer e.g. certificates of professional activity, current job function
- your contact data such as your e-mail address, billing address, delivery address, telephone numbers
- disciplinary and grievance data
- vehicle data including geo-position and vehicle identification data (e.g. license plate, serial number)
- remote diagnostics, repair and maintenance planning data
- badge number(s)
- camera surveillance data (CCTV) including photographs and video images
- incident and accident registration and prevention data
- technical data related to the access to and use of internet portals such as username, IP address, PC name
- financial and billing data such as bank account or credit card details
- in exceptional circumstances details of your marital status, dependents and family and biometric data

We do not typically collect special or sensitive categories of personal data (data which reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, criminal convictions or offences), but we may do so in exceptional circumstances.

2 Who processes your personal data?

Your personal data will be collected and processed by the Company or any subsidiary or affiliate of the Company that is part of the CLdN group from time to time.

3 What are the lawful bases for processing your personal data?

We will process your personal data based on one or more of the lawful bases outlined in the UK GDPR:

- a) the processing is necessary for a contract you have with us, or because you have asked us to take specific steps before entering into a contract
- b) the processing is necessary for us to comply with the law (not including contractual obligations)
- c) the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides these legitimate interests
- d) you have otherwise given consent for us to process your personal data for a specific purpose

4 How do we use your personal data?

We collect, use, store and process your personal data in electronic, paper or automated formats for legitimate purposes. These purposes include but are not limited to:

- fulfilling contractual and pre-contractual obligations, such as providing quotations and processing contract-related data (e.g. bank accounts, order numbers or invoices)
- complying with our legal, regulatory and administrative obligations
- checking your identity
- granting you access to CLdN premises, terminals and vessels
- health, safety and welfare purposes
- security purposes
- management of incidents / accidents
- management and administration of customers and suppliers
- combating fraud
- claims management
- law and criminal enforcement
- accounting
- monitoring of CLdN IT systems
- communicating with you
- internal record keeping



Whilst we do not typically collect special or sensitive categories of personal data, if we do, we may process this data for the following purposes:

- site access control
- law enforcement
- insurance purposes
- fulfilling statutory obligations such as passing on data to the public administration

Please note your personal data is required for access to our premises and vessels. Without this information, we are unable to grant entry, which may impact your ability to perform your duties and/or our ability to comply with legal obligations, such as site safety regulations.

5 How do we collect your personal data?

Most of your personal data is provided to us by the contracting party associated with the Company, such as your employer or the contractor you work for. This is typically the individual or entity in direct contract with the Company and responsible for making arrangements, such as bookings in our systems.

Additionally, we may collect personal data directly from you. For example, this may occur when you create or use access to any online services provided by the Company or when you apply for a position with us.

6 Who has access to your personal data?

Internal use

Your personal data will be accessed only by relevant departments and employees within the Company and its affiliates as necessary for the purposes outlined above.

External use

We may share your personal data within the CLdN group and external third parties for the purposes set out above, including but not limited to:

- port facilities management
- site security service providers
- CCTV and photograph service providers
- badge system providers
- accountants
- auditors
- insurers and insurance brokers
- occupational health service providers

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- internet security providers
 - internal and external IT service providers
 - telephone, internet, tracking and other telecommunications providers
 - professional counsellors
 - inspection services and other government services
 - administrative and judicial authorities
 - platforms of third party customers, suppliers or any other business partners
 - individuals and organizations in direct contact with the data controller(s)
 - credit reference agencies.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7 Will we transfer your personal data outside of the United Kingdom?

Your data may be transferred outside the United Kingdom to the European Union (EU) and the European Economic Area (EEA). These transfers are safeguarded through contracts incorporating the European Commission's Standard Contractual Clauses, ensuring appropriate protection of your personal data.

8 Will we apply automated decision-making in respect of your personal data?

Automated decision-making involves decisions about individuals made solely through automated processing, without human involvement. We will not make decisions regarding your personal data solely through automated means. We will inform you if this changes in the future.

9 How long will we keep your personal data?

Your personal data will be retained only for as long as necessary to fulfil the purposes stated above. In some cases, we may retain your data for a longer period if required by law.

10 What are your legal rights?

For details of your rights under data protection laws, including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data protection issues (www.ico.org.uk), please see our website privacy policy.

If you have any questions about this privacy notice or our data protection practices, please contact the data protection team by sending an email to: gdpr@cldn.com.

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