



PRIVACY NOTICE (EU)

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, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 (hereinafter the “**GDPR**”) and the relevant national data protection legislation.

This Privacy Notice is made up in a Questions & Answer structure and must be read together with 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 will process your personal data?

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

<u>Luxembourg</u>	<u>Belgium</u>	<u>The Netherlands</u>	<u>Other countries</u>
CLdN IT Systems SA CLdN Links SA CLdN RoRo SA	C.Legal BV Carcenter Zeebrugge NV CLdN Cargo NV CLdN Ferries NV CLdN IT Applications NV CLdN Ports Zeebrugge NV CLdN RoRo Agencies NV CLdN Tech NV	CLdN Automotive BV CLdN Automotive Services BV CLdN Cargo BV CLdN Distriport BV CLdN Fleet Supervision BV CLdN Ports Nederland BV CLdN RoRo Agencies BV CLdN Tech BV Rotterdam Car Center BV	CLdN Agencies Unipessoal Lda CLdN Cargo Deutschland GmbH CLdN Cargo Poland Sp.z.oo CLdN Cargo Portugal Lda CLdN Malta Ltd. CLdN Ports Spain S.L. CLdN Agencies Ireland Limited CLdN RoRo Ireland Ltd.

This privacy notice is for you and you are referred to as “**you**” or “**your**”.

3. What is the lawful basis for the processing of your personal data?

We will process your personal data based on one or more of the lawful bases outlined in the 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. What is the purpose for the processing of 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

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- 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 given to the Company by the contracting party of the Company. This can be your employer or a contractor you work for. For example, it is usually the person who is in direct contact with the Company and has booked in our systems.

Information can also be provided directly by you and/or collected by us. For example, some personal data can be collected when you are creating or using access to any (online) services provided by the Company or applying to a position.

6. Who will have access to your personal data?

Internal use

Your personal data will be accessed only by the Company's departments and related companies' employees as necessary to achieve above-mentioned purposes. An example is the use by a ferry booking department and the port facilities. Another example is the registration of your visit to our office.

External use

Personal data may be communicated to and possibly processed by third parties in connection with your employment/occupation for the purposes set out above, such as:

- Port facilities management
- Security service providers such as gate security
- CCTV and photograph service providers
- Badge system providers
- The Company's accountant
- The Company's auditor
- Insurance brokers and insurance providers
- Company medical (insurance) providers
- Occupational health service providers
- Internet security providers
- Internal and external IT helpdesks
- Telephone, internet, tracking and other telecommunications providers
- Professional counsellors
- Inspection services and other government services
- Administrative and judicial authorities
- Platforms of customers, suppliers or any other business partners
- Individuals and organizations in direct contact with the data controller(s)
- Credit reference agencies.

Employees, managers and / or representatives of the above-mentioned service providers or institutes and the specialist service providers appointed by them are bound to respect the confidential nature of these data and may only use this information in accordance with the instructions of the Company. Above that, these companies can also have their own privacy policy.

7. Will my personal data be transferred outside my country of residence or the European Union/ European Economic Area?

Your data could be transferred outside the European Union/European Economic Area to the United Kingdom thanks to the implementation of contracts including Standard Contractual Clauses from the European Commission. This constitutes appropriate safeguards for such transfer of personal data.

8. Will the Company apply automated decision-making?

Automated decision-making is where decisions about individuals are made using processing without human involvement.



The Company will not make decisions about you solely on the basis of automated decision making. If it proposes to at any time, you will be informed.

9. How long will my personal data be kept?

Your personal data will not be kept longer than necessary for the purposes set out above. In some cases, we will keep your data longer, including where we are required by law to keep data for a minimum period.

10. What rights do I have about my personal data that the Company holds?

You have the right to contact the Company at any time with the request to:

- Access, modify or erase your personal data
- Restrict or object to data processing or transmission
- Withdraw your consent for data processing or transfer to the extent that the processing of data would be based on your consent (this does not, however, effect the legality of previous processing)
- Receive your personal data in order to pass it on to another data controller in case the processing is based on your consent or a contract ('right to data portability')
- Lodge a complaint to a supervisory authority in the case you were not satisfied by our response to your request.

If you have any question regarding your privacy, you can send an e-mail to gdpr@cldn.com.

We will handle your request in a timely manner with utmost care.

11. Changes

The Company reserves the right to update its privacy policies from time to time, in accordance with applicable privacy and data protection regulations, including by issuing further Privacy Notices.

v. 5.2025