



**Port of Rotterdam Authority N.V.**

Rotterdam, March 2025

This privacy statement applies to potential and existing customers, their business partners, intermediaries, and stakeholders (hereinafter: "Data Subjects") in relation to the Port of Rotterdam Authority N.V. ("HbR") who wish to establish themselves (elsewhere) in the Port Industrial Complex (including Dordrecht). Through the "Know Your Customer procedure" (hereinafter: KYC-procedure), the integrity of new or existing customers is assessed.

In this privacy statement, we inform you about the processing of personal data by all involved departments of HbR. HbR is the data controller as defined in the General Data Protection Regulation ("GDPR").

This specific privacy statement must be read in conjunction with our [general privacy statement](#).

**Contact information**

*Port of Rotterdam Authority N.V.*

*Wilhelminakade 909*

*3072 AP Rotterdam*

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*Data Protection Officer*

**Email:** [FG@portofrotterdam.com](mailto:FG@portofrotterdam.com)

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*If you have any questions or would you like to exercise one of your rights as an individual, please contact us via the general privacy mailbox [privacy@portofrotterdam.com](mailto:privacy@portofrotterdam.com)*

## **1. Introduction**

Your privacy as a Data Subject is important to us. We handle your data with care and we comply with the laws and regulations that apply to your privacy.

This privacy statement sets out everything concerned with the way your personal data is collected in the context of the KYC procedure and how we handle this at HbR. Additionally, you will find all your rights regarding your data and how you can exercise those rights.

## **2. Processing of Personal Data**

In the context of the KYC procedure, our involved departments may process the following data from you:

- Initial(s), first name, and last name;
- Address and postal code;
- Date of birth;
- Email address(es) and phone number(s);
- Name and Chamber of Commerce number of your organization;
- Copy of identification, passport, or residence permit;
- Information about the applicant's business form;
- Information about conviction, settlement with the public prosecution service Openbaar Ministerie, designation as a suspect, or imposition of an administrative tax penalty in the past five years of the applicant or his/her business partners;
- Whether the applicant has submitted an information form to HbR in the past twelve months;
- Check to what extent the submitter needs to fill out the form again;
- Information about involvement in other companies;
- Information about own and external financing of real estate transactions;
- Signature of the contracting party or authorized representative.

## **3. Purposes**

The aforementioned personal data, or certain parts thereof, will only be processed for the following purposes:

- Verification of the customer's identity to assess integrity risks.
- Assessment of ownership relationships to identify integrity risks.
- Assessment of the criminal record to identify integrity risks.
- Assessment of the integrity of new and existing customers and business partners.
- Assessment of funding sources and creditworthiness to ensure financial integrity.
- Verification of the intended activities and use of the real estate to assess integrity risks.
- Formal confirmation and agreement of the provided information.
- Maintaining the safety and health of the Port Industrial Complex, residents, and employees of HbR.
- Compliance with laws and regulations, including compliance with regulations based on laws and regulations, such as disputes and defence against third-party claims.

#### **4. Legal basis for processing**

HbR will only process your personal data if there is a legal basis to do so. An explanation of these grounds is provided below.

##### ***Legitimate Interest***

The processing of your personal data is sometimes necessary for the protection of the legitimate interests of HbR or a third party (such as ensuring the safety and integrity of port activities by checking whether new users or tenants meet the requirements and to prevent the port from being used for illegal activities), unless these interests must yield to the higher interest of the fundamental rights and freedoms of the Data Subject.

##### ***Compliance with Legal Obligation***

HbR processes your personal data to comply with a legal obligation that rests on HbR.

#### **5. Consequences of Not Providing Personal Data**

As a Data Subject, you are not obliged to provide personal data. However, if you do not provide us with sufficient personal data, we may be unable to carry out our work in the context of the KYC procedure.

#### **6. Retention Periods**

HbR does not retain your personal data longer than strictly necessary for the purposes for which the personal data is collected.

Personal data necessary for the screening of (potential) customers are retained for a maximum of two years after the completion of the KYC procedure, for verification if a new form is submitted by the same party.

Copies of identification documents, passports, residence permits, or criminal records received are deleted immediately after the completion of the KYC procedure.

#### **7. Sharing of Personal Data**

The personal data is provided exclusively to the following third parties for the aforementioned purposes:

- Service providers and/or subcontractors of HbR;
- The Rotterdam Seaport Police;
- Government agencies, regulatory authorities, supervisors, and the Tax Authorities, if necessary to comply with an obligation under laws and regulations to which HbR must comply.

HbR has taken appropriate organizational, contractual, and legal measures with the parties to whom it provides personal data, including entering into processing agreements with processors. These measures ensure that personal data is processed carefully and securely according to the GDPR.

#### **8. Data from Other Sources**

HbR may also collect and process data from other sources, such as data collected from public sources.

#### **9. Transfer of Personal Data Outside the European Union**

Unless otherwise stated, HbR does not process or provide personal data to countries outside the European Economic Area (EEA).

## **10. Rights of Data Subjects**

Under the GDPR your rights as a Data Subject are as follows:

- The right to access and obtain a copy of your personal data;
- The right to correct your personal data if it contains factual inaccuracies;
- The right to request HbR to delete your data;
- The right to restrict the processing of your personal data;
- The right to object to the processing of your personal data;
- The right to data portability;
- The right to withdraw your given consent, if the legal basis allows.

If you wish to exercise your rights, you can submit a request via the general privacy mailbox [privacy@portofrotterdam](mailto:privacy@portofrotterdam) or via the data subject rights form, available on the corporate website of HbR. Note: the above rights are not absolute. This means that HbR does not have to comply with a request to exercise one of the aforementioned rights in all cases.

## **11. Complaints**

If you, despite the care with which the Involved Departments handle your personal data, have a complaint about the way we process your personal data and/or handle your rights, you can file a complaint with the Dutch Data Protection Authority ("AP"). The contact details of the AP can be found on the AP website.

## **12. Changes to the Privacy Statement**

This privacy statement was drawn up on March 14th, 2025. HbR reserves the right to make changes to this privacy statement. We will always make the most recent privacy statement available on the corporate website of HbR.