

**Port of Rotterdam Authority**

Rotterdam, 10 January 2024

This privacy notice serves to inform you about the processing of personal data by all relevant departments within PoR on behalf of the Asset Management department.

PoR is the controller within the meaning of the General Data Protection Regulation (“GDPR”).

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

**Contact details**

*Port of Rotterdam Authority*

*Wilhelminakade 909*

*3072 AP Rotterdam*

*Data Protection Officer*

**Name:** **C. Hakvoort**

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

**Telephone number:** +31 6 22083376

*If you have any questions or would like to exercise one of your individual rights, please send an email to the general GDPR inbox [AVG@portofrotterdam.com](mailto:AVG@portofrotterdam.com).*

## **1. Introduction**

PoR takes your privacy and the privacy of all Data Subjects seriously and therefore we handle all data you provide to us with the utmost care and comply with all applicable privacy laws and regulations.

This privacy notice contains information about the way your personal data is collected in the context of the Machine Learning Inspector project and how it is handled by PoR. It also informs you about your rights regarding your data and how to exercise them.

Please see below a description of the processing:

Within Asset Management, a camera is used to collect image data of the wet and dry infrastructure within the management area of the Port of Rotterdam Authority. This image data is used to train machine learning models and to recognise and evaluate assets. After this phase, new imagery is used to digitally inspect assets on a large scale. This is in line with the objectives laid down in the 2014 Operational Port Agreement.

The objectives are:

- Facilitating an effective, safe and efficient handling of shipping traffic and maintaining nautical and maritime order and security, as well as acting as the competent port authority in the Rotterdam port area;
- The development, construction, management and operation of the port and industrial area in Rotterdam, in the broadest sense.

The obtained image data is anonymised as early as possible in the process. A selection of the data with personal data is stored in order to improve the anonymisation.

## **2. Processing personal data**

For the purposes of or in the context of this processing, our relevant departments may process the following personal data belonging to you:

- Images of persons (faces, physical characteristics).
- Vehicle registration numbers.

### **3. Purposes**

The above-mentioned data, or some of it, is solely processed for the following purposes within the specified context:

According to the 'PoR's objective and definition' (Operational Port Agreement 2014), Asset Management plays a major role in:

- A. facilitating an effective, safe and efficient handling of shipping traffic and maintaining nautical and maritime order and security, as well as acting as the competent port authority in the Rotterdam port area; and
- B. the development, construction, management and operation of the port and industrial area in Rotterdam, in the broadest sense (Art. 2.2)
- C. Image recognition techniques are used to support the management of road safety, for example, to hasten the identification of unsafe situations related to defective assets.

### **4. Basis**

In the context of this project, personal data is processed on the basis of legitimate interests. Please see an explanation of this below.

#### **Legitimate interests**

The processing of your personal data is necessary to pursue the legitimate interests of PoR or a third party, unless those interests must give way to the overriding interests of the fundamental rights and freedoms of the Data Subjects. The processing has been assessed based on the principles of proportionality and subsidiarity.

*Want to know more about this? Please send an email to [AVG@portofrotterdam.com](mailto:AVG@portofrotterdam.com).*

### **5. Consequences of not providing personal data**

As a Data Subject, you are not obliged to provide personal data. If you do not provide us with any or sufficient personal data, we may not be able to carry out our tasks in the context of Asset Management.

## 6. Retention periods

PoR retains your personal data no longer than is strictly necessary for the purposes for which the personal data was collected.

Personal data	Start of retention periods	Retention period	Reason for data retention
License plate and face	From the moment of recording	3 months maximum	Obtained images are anonymised at the earliest stage possible, usually within a week. If a technical problem prevents the data from being anonymised within this term, the images will be stored for a maximum of 3 months on an asymmetrical SSD secured with encryption and/or in a secured PoR cloud environment, which is not publicly accessible to PoR employees.

## 7. Sharing personal data

The personal data is solely shared with the following third parties for the aforementioned purposes:

- Microsoft Azure (cloud storage)

PoR has taken appropriate organisational, contractual and legal measures with the parties to whom it provides personal data, including entering into data processing agreements with processors. These measures serve to ensure that all personal data is processed carefully, securely and in accordance with the GDPR.

## 8. Transferring personal data outside the European Union

Unless otherwise specified, no personal data is processed in or transferred to a country or countries outside the European Economic Area (EEA) by our relevant departments.

If necessary, your personal data or parts thereof may be passed on to a country outside the European Economic Area (EEA). If we share personal data with countries outside the EEA, we always take appropriate security measures to protect the data.

## 9. Rights of data subjects

Under the GDPR you possess the following rights as a Data Subject:

- The right to access your personal data and receive a copy thereof;
- The right to rectify your personal data if it contains manifest inaccuracies;
- The right to ask PoR 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 the portability of your data.
- The right to withdraw your consent, if the basis allows.

If you wish to exercise any of these rights, please send your request to the general GDPR inbox of the Port Authority [AVG@portofrotterdam.com](mailto:AVG@portofrotterdam.com) or use the form 'rights of Data Subjects', which you can find on the PoR's corporate [website](#). In order to process the request, the Data Subject will be asked to provide identification. This is to verify that the request is made by the person to whom the data belongs.

## 10. Complaints

If, despite the care with which the departments concerned handle your personal data, you still have a complaint about how we process your personal data and/or handle your rights, you may submit a complaint to the Dutch Data Protection Authority ("DPA"). You can find the contact details of the DPA on [the website](#) of the DPA.

## 11. Changes to the privacy notice

This privacy notice dates from 10 January 2024. PoR reserves the right to amend this privacy notice. The most recent version of this privacy notice is available at all times on the corporate [website](#) of PoR.