

# Port Alert – Privacy Statement

#### Portbase B.V., version July 2025

This privacy statement applies to users of the Port Alert application ("Data Subjects").

This privacy statement serves to inform you about the processing of personal data by Portbase B.V. ("**Portbase**") in the context of Port Alert. Port Alert is a digital product for truck processing at the Port of Rotterdam.

We take 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 and how it is handled by Portbase.

Portbase is the controller within the meaning of the General Data Protection Regulation ("**GDPR**"). This specific privacy statement for Port Alert should be read in conjunction with our general <u>Privacy Statement</u>.

#### Contact

Portbase B.V. Blaak 16 3011 TA Rotterdam

For questions about this privacy statement, please contact Portbase's Customer Service department at <u>customerservice@portbase.com</u>.

#### 1. Processing personal data

Portbase may process the following data it receives from you via the Port Alert Mobile App:

Data	Application
UserID of Cargo Card	<ul> <li>PoR receives this from Secure-Logistics. This data is used for authentication and authorisation, which involves linking the data to an ID that cannot be traced back to a user (when disconnected).</li> <li>Through identity providers AUth0, Apple &amp; Google, we can link the email address to an ID that is not traceable to a user (when disconnected).</li> </ul>
A position expressed in latitude and longitude over time ('Geo Position')	The location of the phone is only registered once by PoR when a driver makes a report of an incident or confirms or nullifies a report in the application. This only happens if the driver has given permission. This location can only be linked to a UserID and therefore PoR cannot trace it back to a specific person.

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Comments ("Comments" e.g. regarding a disruption).	From the terminals, text can be entered in a field to provide clarification on certain situations. In theory, this may contain personal data.
App crashes, frequency of use, interaction with different screens and other relevant data for analysis and improvement of the application (anonymised).	<ul> <li>Within the application, Firebase Analytics (1) and Firebase Notifications (2) are used.</li> <li>1) For Firebase Analytics, anonymised data is used to improve the service and understand how the functionality is used.</li> <li>2) Firebase Notifications is used to provide users with push notifications regarding updates to the application. A 'device token' is sent to Firebase, with which the messages can be sent to the relevant device. This token cannot be traced to a specific user and the processing is intended solely to provide the user with general messages (such as updates to the application). In both cases, Google's privacy policy applies.</li> </ul>

With a view to maintaining the security of the users of this app, but also those involved in the development of the app, we wish to state explicitly that we **do not** process the following data within the Port Alert Mobile App:

- Identity/name of a driver
- Truck registration number
- Link between equipment and truck/Mobile App

## 2. Purposes

The data as mentioned under 1. is solely processed for the following purposes:

- To gain an insight into possible bottlenecks in the port, specifically at terminals, depots and with regard to drivers and transporters involved in container transport.
- To calculate lead times and make them available via the barometer in the application.
- To manage queues and the flow in the port in a safer and more effective manner.

## 3. Lawful basis

Portbase only processes your personal data if there is a lawful basis for this processing. The applicable types of lawful basis are explained below.

## • Legitimate interests

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For the use of your contact details, Portbase invokes the basis of legitimate interests in accordance with Article 6(1)(f) of the GDPR. The processing of your personal data is in some cases necessary to pursue the legitimate interests of Portbase or a third party, unless those interests must give way to the overriding interests of the fundamental rights and freedoms of the Data Subjects.

# • <u>Consent</u>

We use your phone's location data only if you have given your consent via the device settings. If we process personal data on the basis of this consent, you have the right to withdraw your consent at any time by changing the settings on your phone or by letting us know via <u>security@portbase.com</u>. Withdrawing your consent does not affect the validity of the processing prior to the withdrawal.

## 4. 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 any or sufficient personal data, we may not be able to carry out our tasks.

## 5. Retention

Portbase retains your personal data not longer than strictly necessary for the purposes for which the personal data was collected. Personal data will be anonymised up to 24 hours following the end of the session/port visit.

## 6. Data sharing

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

- Personal data may be processed on Portbase's behalf by external suppliers and/or (IT) service providers. Where these providers act as processors, a data processing agreement is concluded with them. These measures serve to ensure that all personal data is processed carefully, securely and in accordance with the GDPR.
- Government agencies, regulatory authorities, supervisors and the Tax Authority, if necessary to comply with an obligation under the laws and regulations which Portbase is required to observe.

# 7. Transferring personal data outside the European Union

No personal data is processed outside the European Economic Area (EEA).

## 8. Rights of data subjects

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

- The right of access and to obtain a copy
- The right to rectification
- The right to erasure
- The right to restrict the processing
- The right to object to the processing
- The right to the portability of your data



For questions about this privacy statement or if would you like to exercise any of the aforementioned rights, please contact Portbase's Customer Service department at <u>customerservice@portbase.com</u>.

#### 9. Complaints

If, despite the care with which we 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 with the Dutch Data Protection Authority ("DPA"). You can find the contact details of the DPA on the website of the DPA.

#### 10. Changes to this privacy statement

This privacy statement dates from 1 July 2025.

Portbase reserves the right to amend this privacy statement. The most recent version of this privacy statement is available at all times on the Port Alert application.