PORT OF AALBORG

Cookies and Privacy Policy 2026

Table of Contents

1. Our protection of your data 3

2. General terms and conditions 4

3. Situations in which we process data about you 5

4. The basis for our collection of personal data about you 6

5. Recipients of personal data 8

6. When we delete your personal data 9

7. Information about your rights 10

8. Our procedural regulations in respect of your rights 13

9. Contact 14

10. Complaint authority 15

PORT OF AALBORG A/S

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Cookies and Privacy Policy 2026

The Cookies and Privacy Policy was presented and approved at the company's Annual General Meeting on 26 January 2026

1. Our protection of your data

In accordance with the Danish Port Act, Port of Aalborg Group performs the management of port operati-onsat Aalborg port. We operate and maintain port infrastructure, to include stations, quays, roads, docks etc. andalso execute port-related activities, services and services rendered in relation to the private limited port company. We are also responsible for the commercial leasing of land and buildings for port-related and commercial purposes. Therefore, we collaborate and trade with a wide range of actors and stakeholders in connection with the operation of the port, while also fulfilling the role of a private company and public body inrelation to the port operations.

We protect your data, which we regulate externally through this policy. Internally, we protect your data through our personal data policy, functionally divided guidelines for specific types of personal data and procedures for processing, data breaches and ongoing development of the area. We also protect your data through our IT security and annual external auditing through an independent lawyer (based on ISAE 3000).

We not only view a high standard of security concerning the management of your personal data as a matter of compliance with legal and regulatory requirements, but as an element of quality that enables us to offer you a safe and professional service.

2. General terms and conditions

When you contact Port of Aalborg and submit personal information, you accept this cookie and privacy policy.

For the sake of convenience, the following companies are referred to collectively as Port of Aalborg: Port of Aalborg A/S, Port of Aalborg Logistics A/S, Port of Aalborg Real Estate A/S, Port of Aalborg Tank Storage ApS, Aalborg Stevedore Company A/S, Port of Aalborg Rail A/S as well as Port of Aalborg Research & Development ApS.

Below you can read about the data collected, including when such data are processed, what they are used for and who to contact if you have questions or objections regarding the collected data.

3. Situations in which we process data about you

This policy for the processing of personal data (Cookie and privacy policy) describes when Port of Aalborg collects and processes personal information about you in one or several instances:

3.1 When you visit our locations
3.2 When you are a commercial customer or supplier with us
3.3 When you avail of our website, including our use of cookies
3.4 When you communicate with us
3.5 When you receive our newsletter, press releases or other forms of PR and marketing materials

The privacy policy applies to personal data that you provide to us or that we collect through the website or other sources as a result of your relationship with us.

Port of Aalborg is the data controller of your personal data. All inquiries to us concerning your personal data can be made via the contact information listed in Section 7.

4. The basis for our collection of personal data about you

4.1 When you visit our locations - ISPS, video surveillance and logging
As a part of our access control and video surveillance, personal data about you is collected, processed and stored, when you enter our locations. This applies regardless of whether you have regular or occasional access to the location. All persons with regular access to our ISPS / port locations are issued with an access card, which is used for the purposes of identification and access. Name, photo, company name, card number, access rights together with the issue date appear on the card. Movements will be regularly logged upon use of the card. Access control is necessary to ensure that only persons on legitimate business may gain access to the port's ISPS/port locations.

In connection with the port's video surveillance, the movements and behaviour of individuals can be recorded.
Video surveillance is necessary to meet ISPS requirements for port security.

The legal basis for the abovementioned processes may be found in the EU General Data Protection Regulation Article 6(1)(e) and the Danish Ports Act.
Our personnel who process this information are subject to specific guidelines for the procedure, which safeguard and protect your data in this circumstance.

4.2 When you are a commercial customer or supplier with us - contractual and business relationship
We collect data about your name, the company you represent, telephone number, payment method, information about which services you order, delivery time and method, when you are customer or supplier with us. This processing enables us to provide or receive contracted goods and services and fulfil the agreement we have concluded with you and your company.

The legal basis for the abovementioned processes may be found in the EU General Data Protection Regulation Article 6(1)(b), (c) and (f) depending on when the data is received and for what purpose. Our personnel who process this data are subject to specific guidelines for the procedure, which safeguard and protect your data in this circumstance.

4.3 When you visit our websites - enhanced user experience and the use of cookies
When you visit the Port of Aalborg's websites, Port of Aalborg collects data about you. The data is partly aimed at adapting and improving our content.

Port of Aalborg collects data about you in two ways:

I. Using cookies
II. By you providing data yourself on the website

I. Cookies on the website
A cookie is a text file that is stored on your computer, mobile device or equivalent for the purpose of recognising it, remembering the settings, performing statistical analysis and targeted advertisements. Cookies cannot contain malicious code, such as a virus. It is possible to delete or block cookies.
Whenever possible, Port of Aalborg uses differentiated cookies. If you do not wish to receive cookies, you

can block all cookies, delete existing cookies from your hard drive or receive a warning before a cookie is stored. If you delete or block cookies, ads that appear on our website may be less relevant for you and appear more frequently. There is also a risk that the website will not function optimally and you may not be able to access certain content.

II. Personal data via the website

We automatically collect data about you and your use of our websites (portofaalborg.dk and asc-as.dk) if you accept cookies when visiting these websites. Personal data is typically data about your electronic device, to include computer, mobile phone or tablet, your IP address, your geographic location as well as which pages you visit.

When you use our website, a range of data is collected and processed. This happens, for example, when you click to access content, sign up for our newsletter, participate in competitions or surveys, register yourself as a user or subscriber, make use of other services or make purchases via the website. The aim is to optimise the user experience and functionality of the site and show you relevant information.
The legal basis for the abovementioned processes may be found in the EU General Data Protection Regulation Article 6(1)(b), (c) and (f) depending on when the data is received and for what purpose. Our personnel who process this data are subject to specific guidelines for the procedure, which safeguard and protect your data in this circumstance.

4.4 When you communicate with us - specific service and customer care

When you have questions or communicate with us in any manner (in person, by phone, letter, email, VHF, etc.), as a rule we collect data regarding your name, email address and telephone number, which company you represent and the reason for your inquiry. This process is aimed at providing you the service you need.

The legal basis for the abovementioned processes may be found in the EU General Data Protection Regulation Article 6(1)(b), (c) and (f) depending on when the data is received and for what purpose. Our personnel who process this data are subject to specific guidelines for the procedure, which safeguard and protect your data in this circumstance.

4.5 When you receive our newsletter, press releases or other forms of PR and marketing materials - information and marketing

We collect data regarding your name, email address and telephone number, which company you represent, industry and your consent. This enables us to send you requested materials and to also pursue our legitimate interests in sending you marketing.

The legal basis for the abovementioned processes may be found in the EU General Data Protection Regulation Article 6(1)(b), (c) and (f) depending on when the data is received and for what purpose. Our personnel who process this data are subject to specific guidelines for the procedure, which safeguard and protect your data in this circumstance.

5. Recipients of personal data

We only forward your personal data to third parties when we are obligated by law or for the provision of the services we offer. We will not disclose personal data to data processors in a third country.

Your data may be entrusted to external partners who process the information on our behalf. These companies are data processors for us and process data after our instruction and according to data processing agreements. Data processors must not use the data for purposes other than fulfilment of the agreement with us and must not disclose the data. We have concluded written data processor agreements with all data processors who process personal data on our behalf.

6. When we delete your personal data

6.1 When you visit our locations
In connection with our video surveillance, your behaviour and movements can be recorded. All recordings are stored for up to 14 days, after which they are automatically deleted, unless there is justifiable grounds for storing them longer, for example if the recording should be used as evidence in contractual or tort liability disputes. The recordings are also reviewed in the event of accidents and specific suspicions of nonconformity/illegality in respect of our ISPS compliance.

In connection with the use of access cards, your movements will be logged. The log files are saved for up to 90 days, after which they are deleted, unless there are justifiable grounds for storing them longer. The recordings are reviewed in connection with our ISPS compliance.

6.2 When you are a customer or supplier with us
Deletion of personal data in relation to a customer or collaboration occurs at the latest 36 months after cessation of the customer or collaborative relationship and any outstanding matters are concluded/outdated. If the limited period is longer than the prescribed 36 months, the data is deleted within 30 years of cessation of the trade relationship.

6.3 When you visit our websites
The cookies which are sent to you will be stored on your device for a maximum of 12 months from the last time you visited one of Port of Aalborg's websites. Each time you revisit a website, the period is extended. The relevant cookies are automatically deleted upon expiration.

6.4 When you communicate with us
Data collected through your communication with us, your inquiries and requests for information from us, is deleted when it is no longer necessary for the processing of your inquiry and not processed as a part of a contractual relationship.

6.5 When you receive our newsletter, press releases or other forms of PR and marketing materials
Data collected upon your registration for the newsletter is deleted when your consent to the newsletter is withdrawn.

7. Information about your rights

Your rights are protected as we are under certain obligations to you as the data subject, when we process your data. They are stated below together with the significance of our obligations.

7.1. Duty of disclosure
Our processing entity shall ensure that the data subject is aware of the processing of their personal data. This duty of disclosure is pursuant to the EU General Data Protection Regulation Articles 13 and 14. The data subject must therefore be notified of the processing of their personal data.

If the data is collected directly from the data subject, the following data shall be provided:

a) contact information of the data controller,
b) the purpose and the legal basis of/for the processing,
c) the legitimate interests where the basis is applied,
    a. This point is only relevant if a legitimate interest is applied as a legal basis. The legitimate interest will as an overriding principal be with a view to trade.
d) possible recipients of the data subject's data,
e) the basis for the period, the personal data to be stored,
f) the right of access, correction, deletion, restriction and objection,
g) the right to withdraw consent,
    a. This point is only relevant if the legal basis for processing personal data is a consent from the data subject.
h) the right to lodge a complaint with the Data Protection Agency, and
i) whether the information is mandatory or required under an agreement, as well as the consequences of failure to disclose the data.

The above information shall be provided by the processing entity and the employee at the time when the personal data was collected/received from the data subject.
If the personal data to be processed is not collected from the data subject, the data subject shall in all instances be notified to document when and how the data subject was informed of the processing. The rights of the data subject, see schedule (a) to (i) above, shall be informed in this context. Additionally, there shall be stated

j) what personal data about the data subject is to be processed,
k) where the personal data originates from, and
l) if the personal data originates from publicly available sources.

In this case the processing entity concerned and the employee shall no later than one month after commencing the processing, though at the latest in connection with disclosure, if such occurs, provide the information to the data subject.

The duty of disclosure regarding personal data for processing which has not been obtained from the data subject or by mutual agreement or similar, however does not apply if

a) notification proves impossible or would require a disproportionate effort,
b) collection or disclosure occurs in accordance with the EU or Danish law to which the company is subject,
c) personal data shall remain confidential under a legally regulated duty of confidentiality.

If personal data must be further processed for purposes other than those for which they were collected, the employee shall prior to the further processing inform the data subject of the new purpose together with any other relevant additional information that falls within the duty of disclosure.

7.2. Right of access
The data subject has the right to obtain confirmation as to whether or not personal data concerning the data subject is being processed and where that is the case, access to the personal data and the following information:

a) the purposes of the processing,
b) the categories of personal data concerned,
c) possible recipients of the data subject's data,
d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,
e) the right of access, correction, deletion, restriction and objection,
f) the right to lodge a complaint with the Data Protection Agency,
g) any available information about the source of the data, if the data is not collected from the data subject, and
h) the existence of automated decision-making, including profiling.

If personal data about the data subject is processed, the data subject shall be provided with a copy of data, including documents in which the data appears. However, it is important to ensure that personal data of persons other than the petitioner remain anonymous in the delivered copies.

7.3. Duty of rectification
The processing entity and their employees shall at all times ensure that the personal data is correct upon processing and that the personal data is updated when stored for a longer period.

Consequently, inaccurate personal data shall always be rectified without undue delay by the employee when the employee becomes aware of the inaccuracy, whether the rectification is performed at the data subject's request or as a consequence of internal regular updating. The data subject is entitled to have inaccurate data about them rectified under the EU General Data Protection Regulation Article 16 and the entity and the employee are obligated to rectify the data.

All registered personal data shall at a minimum be dated to enable regular updating and replacement of the registered data.

7.4. Duty to erase
Data shall be deleted by the processing entity and the employee at the latest when the purpose and legal basis for the processing no longer exists. The data shall also be deleted, when

a) registration is not necessary for the specified purpose,
b) consent for the processing is withdrawn,
c) the data subject objects to the processing when no legal basis or exemption exists,
d) the personal data is unlawfully processed,
e) deletion occurs in accordance with the law.

Upon deletion it is important that the individual employee ensures that deletion occurs from all systems.

7.5. The right to restricted processing
There shall not be processed more personal data than is objectively necessary. Processing of the data shall be restricted, when

a) the accuracy of the data is contested,
b) the processing is unlawful and the data subject opposes erasure but requires restrictions,
c) the data controller no longer needs all the data, but the data is necessary for the enforcement of legal claims,
d) the data subject objects to the processing pursuant to EU General Data Protection Regulation Article 21

If processing has been restricted, such personal data shall, with the exception of storage, only be processed with the consent of the data subject or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another physical or legal person, or for reasons of important public interest of the EU or a Member State. A data subject who has obtained restriction of processing shall be informed before the restriction of processing is lifted.

7.6. Notification to recipients upon rectification, erasure and restriction
Employees shall ensure that eventual recipients of personal information about the data subject are notified of related rectification, erasure and restriction in each case, unless this proves impossible or excessively difficult. In such instances, the data subject shall upon request be informed of the notification by the employee who processes the data.

7.7. Data portability
The entities have no IT systems that can make so-called automatic processing or profiling, and the provision of data portability under EU General Data Protection Regulation Article 20 is therefore not currently relevant.

7.8. Right to object
In cases where the personal data is processed on the grounds of a legitimate interest, the data subject can object to the storage.

Generally, under these circumstances all data processed about the data subject on the grounds of a legitimate interest shall be deleted. If the data is processed for a different reason, the objection can be rejected. A specific assessment must be conducted. If the personal data is e.g., part of a contract, the processing of the data can continue.

However, the above basis is waived if compelling legitimate grounds for the processing can be demonstrated, which override the interests, rights and freedoms of the data subject or if the processing is necessary for the establishment, exercise or defence of legal claims.

8. Our procedural regulations in respect of your rights

The employee who processes your data shall in each case safeguard your rights.

Upon receipt of a request from you, the employee shall acknowledge receipt of your request as soon as possible and within 5 working days where possible. The estimated response time is stated in the receipt notification.

When you exercise your rights of access, rectification, erasure, restricted processing, objection etc., we shall inform you of the proposed measures without undue delay and within one month at the latest, in accordance with the EU General Data Protection Regulation Article 12.

If due to the complexity and/or number of requests it is not possible to comply with the request within a month, the response time may be extended to 2 months. However, the extension requires that the employee who processes the request informs you of the delay, including the grounds for the delay, no later than one month after receipt of the request.

In general, every notification to you shall be provided in writing and electronically, unless otherwise requested by the data subject, and always concise (precise and surmisable), transparent (intelligible and easily understood) and in an easily accessible form (commonly used file format).

Your requests to us are essentially free, see EU General Data Protection Regulation Article 12.

If upon submission of a request there is any doubt about your identity, the employee may submit a request for further information to confirm your identity. This is done to protect your data. If this further information is not received, the employee prepares a memo stating that the further information has not been received and is therefore no longer prudent to comply with the request.

9. Contact

If you would like access to data recorded about you by Port of Aalborg, you shall direct your inquiry to us at info@portofaalborg.com.

If inaccurate data has been recorded, or you have other objections or requests, please contact us at the same address. We refer you to Section 7 concerning your rights.

Publisher and owner of websites as well as the personal data controller for all companies in the Port of Aalborg Group A/S under the group agreement:

Port of Aalborg Logistics A/S
CVR No: DK35143335
Vejdybet 16
DK-9220 Aalborg East
Email: info@portofaalborg.com
Tel: +45 99 30 15 00

10. Complaint authority

You have the opportunity to complain about our processing of your personal data to the Data Protection Agency.

Complaints shall be submitted to:

Data Protection Agency
Carl Jacobsens Vej 35
DK-2500 Valby

Aalborg, 26th January 2026

Kristian Thulesen Dahl, CEO

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