

Belfast Container Terminal - Data Privacy Notice

1. Introduction and scope of policy

Belfast Container Terminal Limited (“BCT”) respects your right to privacy and we are committed to protecting your personal data. The purpose of this privacy notice is to explain how we collect and use personal data and this policy sets out:

- What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website, mobile applications and online services.
- Where we obtain the data from.
- What we do with that data.
- How we store the data.
- Who we transfer/disclose that data to.
- How we deal with your data protection rights.
- And how we comply with the data protection rules.

All personal data is collected and processed in accordance with Irish, EU and UK data protection laws as applicable.

This privacy policy applies to our processing of your personal data when you as a customer and/or visitor to the website use our services, or if we receive your personal data from a person or organisation contracting our services.

This policy does not cover “cookies” where applicable. In this regard, please see our Cookie Policy [here](#).

2. Data Controller

“BCT” (referred to as “we”, “us”, “our” or “BCT” in this policy) primarily refers to the container freight business of Belfast Container Terminal. BCT is the “data controller” of all personal data that is collected about our customers for the purposes of Irish, EU and UK data protection law as applicable. BCT is registered in Northern Ireland with registration number NI059016 and registered offices at 1 Lanyon Place, Belfast, Northern Ireland, BT1 3LP.

3. How to contact us

If you have any questions about this policy or a data subject access request, please contact the BCT Data Protection Officer at dataprotection@icg.ie

4. The personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, and information about your access and use of our website and apps.

We collect personal data about you when: (i) you or someone else on your behalf contracts our services (either directly or indirectly through an agent / third party), (ii) you create a BCT account, (iii) you use our website, web app and other websites accessible through our website, or (iv) you contact us. We may also process personal data about you, which we receive from law enforcement authorities.

To provide you with our services, we collect and process various categories of personal data throughout your relationship with us. These include:

- **Customer data** (including Drivers and Hauliers) - such as your name, address, contact details, booking location and services used and provided;
- **Usage and location data** – information about your use of our website and web app including browser settings, domain name, browser type, browser language, device ID, operating system type, device name and model, pages or screens viewed, links clicked, IP address, when and the length of time you visit our website and the referring URL, or the webpage that led you to our website;
- **Communications data** - correspondence through emails, text and social media that you have exchanged with us
- **Surveillance (CCTV) data** – all access to the terminal facility is subject to recording by CCTV for the purposes of maintaining health and safety standards and prevention and detection of criminal activity.

5. Special Categories of personal data

In some circumstances we may collect information about your health, where you have advised us of particular needs you have including medical, mobility or dietary requirements.

We will only process such data where you have given your explicit consent (for example, where you request special assistance), or where it is necessary to protect your vital interests or those of other people, or where you have deliberately made this information public. The processing of such personal data may also be necessary for compliance with public health legislation, regulatory requirements or other entry requirements in your destination/s. Some of these requirements apply directly to you as a customer and some apply to BCT and we are required to ensure (and may be required to demonstrate to our regulators, law enforcement and public health authorities) that these requirements have been complied with in the interests of public health.

6. How we obtain your personal data

BCT obtains personal data when (i) you provide it to us, for example as part of a container booking, or in email communication, (ii) you use of our website, your use of our services and the technology you use to access our booking services (for example your booking location, Internet Protocol (IP) address, or telephone number) and (iii) from third parties e.g. Hauliers and Shipping Agents. As mentioned above, we may also receive personal data about you from law enforcement authorities.

7. How we use your personal information

We use your personal information for the following purposes and on the following legal grounds.

Type of data	Why we process it	Legal basis
Customer (Driver/ Haulier) data	<p>To enter into our contract of services with you or your employer so we can provide you with the services you request. This includes setting up your account, processing your container booking and associated transactions(moves, lifts and "gate moves"), to make changes to your booking requested by you or to inform you of any changes we make to your booking.</p> <p>To fulfil our legal and regulatory obligations, for example to record, maintain and share driver records and surveillance data necessary for terminal health and safety, maritime safety, security immigration or customs regulations and laws</p>	<p>This use is necessary in order for us to enter into and perform our contract with you or your employer.</p> <p>In order to comply with our legal obligations, including the International Ship and Port Facility Security Code (ISPS Code)</p>
BCT account data	To allow you to securely login and use your account for the purposes of reserving services, viewing terms and conditions of service and auditing activity	This use is necessary in order for us to enter into and perform our contract with you or your employer, and to maintain transparency of the services provided.
CCTV Surveillance data	all access to the terminal facility is subject to recording by CCTV for the purposes of maintaining health and safety standards and prevention and detection of criminal activity	In order to comply with our legal obligations to provide a safe place of work, including the International Ship and Port Facility Security Code (ISPS Code)
	Special categories of data	Legal basis
Health data	<p>Health data is not routinely collected, but we may process information about your health, where you have advised us of particular needs you have including medical, mobility or dietary requirements.</p> <p>We may process health information to protect your vital interests or those of other people or where you have made the information public</p>	<p>This may be based on your explicit consent, and you are entitled to withdraw such consent at any time. We may process your health data where it is necessary to protect your vital interests or those of other people, or where you have deliberately made this information public.</p> <p>The processing of such personal data may also be necessary for compliance with public health legislation, regulatory requirements or other entry requirements in your destination/s</p>

Please note that you may have a right to object to processing of your personal information where that processing is carried on for our legitimate interests.

Where applicable, only children aged 16 or over can provide their own consent. For children under this age, consent of the children's parents or legal guardians is required.

8. How long we keep your personal information

BCT will not retain your data for longer than is necessary to fulfil the purpose for which it is being processed. We must also consider periods for which we need to retain personal data in order to meet our legal obligations or to deal with complaints, queries, regulatory requirements, for audit purposes, to demonstrate compliance with relevant legislative and financial requirements and to protect our legal rights in the event of a claim being made. We anonymise and or delete data that is no longer required.

In general, most driver and account data is deleted or anonymised 2 years after the last recorded activity, except where a booking or a related matter is the subject of a claim or legal proceedings. Limited information is retained to maintain the integrity of records and to comply with financial reporting requirements.

Surveillance (CCTV) data is deleted after 30 days, except where a booking or a related matter is the subject of a claim or legal proceedings.

9. Security

Your privacy and the security of your personal data is of critical importance to BCT. Taking into account the nature of your personal data and the risks of processing, we have put in place appropriate technical and organisational measures to ensure an appropriate level of security and to prevent any accidental or unlawful destruction, loss, alteration, disclosure, intrusion of or unauthorised access to these data.

When you book online or access your account at icgterminals.com you do so through secure servers. The use of Secure Socket Layer (SSL) technology means that personal data will be encrypted as it travels from your computer to the booking system. SSL is an industry-standard method that is used to transmit personal information securely over the Internet. Our use of SSL and digital certificates ensures you are actually sending data to BCT, rather than a third party, so you can be confident of safely and confidentially completing your reservation. All payment data is transmitted in compliance with Payment Card Industry Data Security Standards (PCI DSS).

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish, UK and EU law on data protection law as applicable.

In the event that BCT suffers a breach involving your personal data and this breach creates a high risk to your rights, we will inform you about the breach, the likely consequences of it and the measures we have put in place to protect you and others.

10. Transferring personal data outside the EEA

At present your personal data will be held within the EEA. Should it become necessary to transfer your data outside the EEA for any reason, we will inform you in advance .

11. Sharing information with third parties

At present, we disclose your personal information to some or all of the following:

- a) Service providers such as shipping and maritime service providers, terminal security providers, sub-contractors acting on our behalf to provide system administration services.
- b) Where required by law, to law enforcement agencies, judicial bodies, government entities or regulatory bodies.

12. Your rights

<p>Right of Access</p>	<p>You can request a copy of the personal data we hold about you. If you wish to access personal data we hold about you, you can contact our DPO at datprotection@icg.ie.</p> <p>You will need to provide a copy of your photo ID, either passport or national ID, when making your request so we can verify your identity. We may not be able to provide you access to the data when it involves information relating to others who have not consented to the disclosure of their data. We will also have to verify your email address before we can send the data to the email address provided in the request.</p>
<p>Right to Rectification</p>	<p>If you have reason to believe any of the information we collect on you may be inaccurate, and you cannot correct such inaccuracy yourself through your registered account with us, please contact us (see Contact Us above).</p>
<p>Right to Erasure ('Right to be Forgotten')</p>	<p>You have the right to request that your personal data be deleted in certain circumstances including</p> <ul style="list-style-type: none"> • The personal data is no longer needed for the purpose for which they were collected. • You withdraw your consent (where the processing was based on consent). • You object to the processing and there are no overriding legitimate grounds justifying us processing the personal data. • The personal data has been unlawfully processed; or • To comply with a legal obligation. <p>However, this right does not apply where, for example, the processing is necessary:</p> <ul style="list-style-type: none"> • To comply with a legal obligation; or • For the establishment, exercise or defence of legal claims. <p>For example, which we may be able to delete some of your personal data, we will retain the personal data that relates to a contract between you and BCT to perform the contract, defend or pursue our legal rights and meet our obligations towards regulatory or governmental authorities.</p>
<p>Right to Restriction of Processing</p>	<p>You can ask that we restrict your personal data (i.e., keep it but not use it without your permission) where:</p> <ul style="list-style-type: none"> • The accuracy of the personal data is contested. • The processing is unlawful, but you do not want it erased. • We no longer need the personal data, but you require it for the establishment, exercise or defence of legal claims; or • You have objected to the processing and verification as to our overriding legitimate grounds is pending. <p>We can continue to use your personal data:</p> <ul style="list-style-type: none"> • Where we have your consent to do so. • For the establishment, exercise or defence of legal claims. • To protect the rights of another; or

	<ul style="list-style-type: none"> • For reasons of important public interest.
Right to Data Portability	<p>You have a right to receive your personal data back in a structured, commonly used and machine-readable format, and to have those data transmitted to a third-party data controller without hindrance but in each case only where:</p> <ul style="list-style-type: none"> • The processing is carried out by automated means; and • The processing is based on your consent or on the performance of a contract with you.
Right to Object	<p>You have a right to object to the processing of your personal data in those cases where we are processing your personal data based on public interest or in reliance on our legitimate interests. In such a case we will stop processing your personal data unless we can demonstrate compelling legitimate interests which override your interests or where necessary for dealing with legal claims.</p>
Right to Complain	<p>You have the right to lodge a complaint with the Data Protection Authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of your personal data infringes the GDPR. The Information Commission (ICO) in the UK is the lead data protection supervisory authority for BCT so please be aware that your complaint may be transferred to the Information Commissioner.</p>

13. Terms and Conditions of Trading

Full information on BCT standard terms and conditions of trading can be viewed on request.

14. Policy changes

This Policy was last updated on 06.12.2023. Any changes to this policy will be published on our website.