



Gramex ry
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PRIVACY POLICY

Name of the register

Client register for licensing

Controller

Gramex, Copyright Society of Performing Artists and Phonogram Producers in Finland

Contact person in matters related to the register

Petri Kiiski, Director, Licensing
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Legislation

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

Finnish Personal Data Act (523/1999)

Grounds for and purpose of the personal data processing

Gramex collects data in the client register for licensing in order to manage the client relationship between Gramex and its licensing clients, to enable communication, and to use them for invoicing and other management of the client relationship and enforcement of copyrights.

The legal basis for the processing of the personal data is:

- the client relationship between the licensing client and Gramex and execution of the agreement;
- performing tasks assigned to Gramex in legislation; and/or
- separate assignment or consent from the client or its representative.

Personal Data may be processed for the following purposes:

- the performance of tasks and provision of services set out in legislation and agreements;
- management and development of the client relationship and services;
- implementing and developing customer communications and confirming client events;
- collection of copyright remunerations and operations supporting such collection;
- storage and analysis of client data for the development of services; and
- other similar purposes related to the management and development of the client relationship.

Information content of the register

The register may contain following information:

- person's information, such as first name, last name, date of birth and personal identity code;
- contact details, such as postal address, email address and telephone number;
- Business ID;
- line of business;
- client and agreement number;
- date of commencement and termination of the client relationship;
- information on the determination of invoicing grounds; and
- other data related to the management of the client relationship.

Regular sources of information

Data will be regularly collected from:

- the client and/or their representative;
- GT Music Licences Ltd;
- the postal services and other similar operators administering address information; and
- public sources, such as company websites.

Regular disclosures of data and transfer of data

Personal and client data will not be regularly disclosed or transferred outside the EU or EEA.

Data may be disclosed or transferred to GT Music Licences Ltd, which runs the customer service for the licensing of the public performance of phonogram music on behalf of Gramex.

Data may also be disclosed or transferred to Gramex's member and sister organisations and other co-operating organisations as and to the extent required by Gramex's operations.

Retention period of personal data and criteria for determining such period

Gramex retains personal data collected in the client register for licensing for as long as it is necessary for the purpose of the processing of personal data as indicated above and for the fulfilment of statutory requirements.

Data subject's rights

Right of access

The data subject has the right receive a confirmation as to whether or not Gramex processes personal data concerning them.

If Gramex processes personal data which concerns the data subject, the data subject has the right to check what categories of personal data concerning them have been stored in the register.

Access to the data is free of charge once per year. The subject access request must be made in a signed or other similarly verified document or personally in the controller's premises. The written subject access request must be delivered to the contact person indicated in the beginning of the policy in all matters concerning the register.

Right to request for rectification of data

The data subject has the right to request Gramex to rectify any inaccurate personal data about them. Gramex will rectify, erase or complete any inaccurate, unnecessary, incomplete or outdated personal data in the register without delay upon the data subject's request or on its own initiative upon becoming aware of such information.

Any requests concerning the rectification of data must be made in writing. The request must specify what data the request for rectification concerns. The request must be delivered to the contact person indicated in the beginning of the policy in all matters related to the register.

Right to erasure, restriction of processing and to object to processing

In situations set out in the General Data Protection Regulation, the data subject has the right to have Gramex remove personal data concerning them processed by Gramex and/or restrict the processing of personal data concerning them. The data subject also has the right to object to the processing of their personal data on grounds related to their particular situation.

Provisions on these rights are set out in Articles 17, 18 and 21 of the General Data Protection Regulation.

Right to data portability

To the extent that the processing of personal data is based on consent or agreement, the data subject has the right to receive personal data concerning them which they have provided to Gramex, and to transmit it to another controller.

Direct marketing

Gramex does not disclose the data in the registers to third parties for direct marketing purposes.

The client may give Gramex their consent to direct marketing as referred to in the Finnish Act on Electronic Communications Services or prohibit Gramex from processing data related to them in relation to direct marketing. The client may give their consent to direct marketing separately for each channel (messages to mobile phone or to email). The client may forbid direct marketing through different channels.

If the client gives no consents and imposes all possible prohibitions, the client will only receive client communications related to the provision of Gramex's services and management of the client relationship.

Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with the supervisory authority if they consider that their rights under the General Data Protection Regulation have been infringed.

The supervisory authority is the Finnish Data Protection Ombudsman.

Principles of protecting the register

Manual material

Any manual material is stored in Gramex's premises protected by means of access control. Data will be processed only by specific persons employed by Gramex who need the data in the register over the course of their working duties.

Data stored in data systems

Data stored in the data systems of the register have been protected against unjustified processing. The protection is based on access and user control concerning the service through the use of personal user identifiers and the restriction and classification of access rights.

The register's data processed electronically are protected by firewalls, passwords and other technical means generally accepted in the field of data security.

Data will be processed only by specific persons employed by Gramex who need the registered data over the course of their working duties.

The data systems' servers are located within the European Union.

Amendments to the privacy policy

Gramex is constantly developing its operation and therefore reserves the right to amend this privacy policy by informing clients about the current content of the privacy policy on its website. Amendments may also be based on changes in legislation. Gramex recommends the data subjects to regularly acquaint themselves with the content of the privacy policy.