

## PRIVACY POLICY

### Name of the register

Register for communications

### Controller

Gramex – The Collective Management Organisation for Recorded Music in Finland

### Contact person in matters related to the register

Lauri Kaira, Director, Communications and Public Relations  
Gramex, Port of Music  
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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)

Tietosuojalaki (5.12.2018/1050)

### Purpose of the collection of personal data and grounds for the processing of personal data

Gramex collects personal data in the register for communications in order to maintain and manage client relationships and other relationships which are relevant to Gramex's operations, and to enable Gramex to inform clients of matters related to Gramex.

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

- performing tasks assigned to Gramex in legislation;
- relevant connection or agreement between the data subject and Gramex and/or
- legitimate interests of Gramex or a third party.

The data subjects are individuals who have a relevant connection to Gramex for example as a client, employee, media representative or member or representative of another interest group.

Personal Data may be processed for the following purposes:

- the performance of tasks and provision of services set out in legislation and client agreements;
- management and development of the client relationship and services;
- management and development of communications with interest groups; and
- other similar uses.

### Information content of the register

The register may contain following information:

- person's information, such as first name, last name, title and/or position in an association or corporation;
- contact details, such as postal address, email address and telephone number;
- mailing information for the GramexPress magazine;
- invitation and participation information regarding events organised by Gramex;
- information needed for organising catering at events, such as information on allergies;
- photographs from events organised by Gramex; and
- other data related to the management of client relationships and co-operation with interest groups.

### Regular sources of information

Data will be regularly collected from the following sources:

- the data subject;
- the postal services and other similar operators administering address information;
- interest groups;
- open sources, such as websites of associations or corporations.

### 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 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 register for communications for as long as it is necessary for

the aforementioned purpose of the processing of personal data.

Information used for arranging the catering at events is removed from the register immediately after it is no longer needed for organising the event for which it has been collected.

## **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.

### 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

The data in the register for communications is mainly stored in data systems. Insofar as any information is stored in manual form, it is stored in premises protected by means of access control.

### Data stored in data systems

The registered data is protected against unauthorised access, alteration and loss. The protection is based on access and user control 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.

The data is processed only by specific persons separately entitled to process data and employed by Gramex.

The integrity of the data is ensured by using back-up copies. The data systems' servers are located within the European Union.

## **Amendments to the privacy policy**

Gramex is constantly developing its service activities 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.

Privacy policy updated 21.5.2021.