



Gramex
 Port of Music
 Keilasatama 2 A
 FI-02150 Espoo, Finland
<https://www.gramex.fi/en/gramex-eng/>

Privacy policy – communication, stakeholder relations and advocacy

The name of the register: Personal data register of the communication unit

Data controller

Gramex – The Collective Management Organisation for Recorded Music in Finland, Business ID 0201196-9

Port of Music
 Keilasatama 2 A
 02150 Espoo

The contact person in the processing of personal data regarding communication is Sari Aalto-Setälä, Communications Director.

Email address: sari.aalto-setala@gramex.fi

The purpose and grounds of personal data processing

Gramex collects personal data in the communication unit's personal data register. The main purpose of the collected data is the maintenance and management of customer relationships and other relationships relevant to Gramex's operations, as well as informing about matters related to Gramex. Personal data can also be processed for purposes related to the development of customer relations and service and the development of communication.

The processing of personal data related to communication is based on the data subject's consent, the agreement between the data subject and Gramex, the implementation of tasks set for Gramex by law, or the legitimate interest of Gramex or a third party. The data subject can withdraw their consent at any time by notifying the controller's contact person mentioned at the beginning of this privacy policy.

What personal data does Gramex collect and where is the data collected from?

For the purposes mentioned above, Gramex collects the following personal data:

- the person's information, such as first name, last name title and/or position in the organisation,
- contact information, such as postal address, email address and telephone number,
- publicly available information related to a generally known person about the party they represent and their position in the party, as well as information about committee membership,
- GramexPress magazine mailing information,
- invitation and participation information for events and occasions organised by Gramex,
- information needed to organise catering at events and occasions, such as allergy and special dietary information,
- photographs taken at events and occasions organised by Gramex, as well as

- other information related to the management of customer relations and stakeholder cooperation.

As a general rule, personal data is collected directly from the person themselves. Personal data is also collected from the following sources:

- entities managing address information,
- stakeholders,
- various open sources, such as organisation websites and social media.

In order to improve communication, we may also monitor the links they click on our homepage, newsletters and social media updates for persons who have given their consent.

Personal data retention period

Gramex stores personal data for as long as it is necessary to fulfill the purpose of personal data processing defined above.

Different retention periods may be applied to different groups of personal data. Gramex may also have a legal obligation to retain personal data and documents containing personal data for a certain period of time. Such obligations may result, for example, from accounting and tax legislation.

We aim to keep the personal data in our possession correct and up-to-date by deleting unnecessary data and updating outdated data. At events and occasions, the information needed to organise catering is deleted from the register after it is no longer needed.

Transfer of personal data

Personal data can be disclosed or transferred to Gramex's member and sister organisations and other cooperative organisations in the manner and scope required by Gramex's operations.

Personal data can also be transferred to external service providers who process personal data as part of the service they provide to Gramex. Personal data can be disclosed, for example, to a service provider managing the sending of newsletters for the purpose of implementing the service. Contractual arrangements with all service providers that process personal data have ensured that personal data is processed in accordance with current legislation.

Primarily, Gramex does not transfer personal data belonging to the communication unit's register outside the EU or the EEA.

Information security

The information in the register is protected from unauthorised viewing, modification and disposal. Protection is based on access and access control using personal IDs, as well as limitation and classification of user rights.

The information stored in the systems is protected by firewalls, passwords and other generally accepted technical means in the field of information security. The data is processed only by certain persons who need the register's data in their work. The rights to view and change data are classified and limited

according to the work tasks of Gramex personnel and various levels of user rights. Data changes made internally by Gramex are automatically logged in its own technical tracking and logging system. Data integrity is ensured by backup recordings and physical security procedures. The servers of the information systems are located in the territory of the European Union.

Databases and backups are located in locked rooms. Manually processed documents containing personal data are kept in locked rooms, access to which is controlled, for example, by means of access control.

Rights of the data subject

Right of inspection. If Gramex processes personal data concerning the data subject, the data subject has the right to check which personal data groups concerning them are stored in the register. Inspection is free of charge once a year. The written inspection request must be submitted to the contact person mentioned at the beginning of the report. Before handing over the data, Gramex must be able to verify the identity of the data requester.

The right to demand rectification of data. The data subject has the right to demand that Gramex correct inaccurate and incorrect information about them. Gramex corrects, deletes or completes incorrect, unnecessary, incomplete or outdated personal data in the register at the request of the data subject or upon noticing such information on its own initiative without delay.

The request for rectification and correction of information must be made in writing and it must specify which information the correction request applies to. The written inspection request must be submitted to the contact person mentioned at the beginning of this privacy policy.

The data subject also has the opportunity to correct certain information they find to be incorrect via the web service of the registrar by registering as a user of the service.

The right to delete data, limit processing and object to processing. The data subject has the right, in situations defined in the General Data Protection Regulation, to have Gramex delete their personal data and/or limit the processing of their personal data. In addition, the data subject has the right to object to the processing of personal data concerning them on the basis of their personal special situation. The rights in question are stipulated in Articles 17, 18 and 21 of the General Data Protection Regulation.

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

The right to object to direct marketing and related profiling. Gramex does not hand over the information in the registers to third parties for direct marketing.

The data subject can prohibit Gramex from processing information about them in connection with direct marketing or related profiling.

The right to file a complaint with the supervisory authority. The data subject has the right to file a complaint with the supervisory authority if they consider that their personal data has been processed in violation of this privacy policy or the legislation in force at any given time. You can find the supervisory authority's contact information on the website of the Office of the Data Protection Ombudsman at [Office of the Data Protection Ombudsman - Office of the Data Protection Ombudsman](#).

Amendments to the privacy policy

Gramex is constantly developing its operations and therefore reserves the right to amend the privacy policy by announcing its current content in its services. The amendments can also be based, for example, on the development of legislation. Gramex recommends data subjects to acquaint themselves with the content of the privacy policy regularly.

The privacy policy was last updated on 1 February, 2023.