



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

Privacy Policy - processing of personal data of the licensing unit

The name of the register; Licensing unit register

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 matters concerning personal data of licensing clients is the key account manager Elmo Helokumpu.

Email address: elmo.helokumpu@gramex.fi

The purpose and grounds of personal data processing

Licensing clients' personal data is stored in Gramex's personal data registers. The main purposes of the collected data are managing customer relationships between Gramex and licensing clients and enabling communication, as well as invoicing, clientship management and copyright control.

The register is also used for the following purposes:

- the implementation of the tasks set out in the legislation and provided by contract, as well as the provision of services,
- managing and developing client relations and service,
- implementing and developing client communication, and verifying client transactions,
- collection of copyright royalties and measures to support it,
- statistics and analysis of client data for the development of services and
- other similar uses related to clientship care and development.

The processing of personal data of licensing clients is based on the agreement between the client and Gramex, legislation, legitimate interest or consent. 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 of licensing clients:

- the person's information, such as first name, last name and date of birth,
- contact information, such as postal address, email address and telephone number,

- business ID,
- industry,
- client and agreement number,
- clientship start and end date,
- data used as basis for invoicing, as well as
- other information related to membership management.

As a general rule, information about licensing clients is collected directly from the person themselves or their representative at the beginning of the clientship. Personal data is also collected from the following sources:

- GT Music Licences Ltd,
- entities managing address information and
- various open sources, such as community websites.

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.

Transfer of personal data

Collection of copyright royalties and supporting measures. Personal data can be disclosed or transferred to GT Music Licences Ltd, which, on behalf of Gramex, manages the customer service for licensing the public performance of recorded music. Information can also be handed over or transferred to Gramex's member and sister organisations and other cooperative organisations in the manner and scope required by Gramex's operations.

External service providers. 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.

Authorities Gramex can hand over personal data of licensing clients to the authorities as required by the applicable legislation at any given time.

Collection and enforcement of rights. Licensing clients' personal data may be disclosed to third parties if it is necessary to enforce contracts or rights, to collect claims, to investigate possible violations of rights or to present a legal claim or to defend against a claim.

Transfer outside the EU and EEA. Primarily, Gramex does not transfer personal data belonging to the licensing 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 online 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 February 1, 2023.