



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 rightsholders

The name of the register: Rightsholder 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 rightsholder clients is the Client Manager Tarja Henriksson

Email address: [tarja.henriksson@gramex.fi](mailto:tarja.henriksson@gramex.fi)

### The purpose and grounds of personal data processing

Personal data of rightsholders is stored in Gramex's rightsholder unit register. The main purpose of the collected information is the accounting and payment of copyright royalties to the rightsholders entitled to them, as well as managing customer service.

The register is also used for the following purposes:

- Developing the customer relationship between Gramex and the rightsholder,
- implementing and developing member communication, and verifying client transactions,
- execution of the client agreement,
- performance of tasks assigned by law,
- maintenance of Gramex registers and international registers for recordings and music videos,
- licensing of recordings and music videos and collection of royalties,
- activities supporting the accounting and payment of copyright royalties,
- promoting rightsholders' rights in accordance with Gramex's rules and
- research and recording of history related to the recording industry.

Gramex collects and accounts for remunerations based on client agreements and contractual and compulsory license decisions. For this reason, among others, Gramex also processes the personal data of rightsholders other than its clients. The processing of the rightsholders' personal data is based on a client agreement, 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 rightsholder members:

- the person's information, such as first name, last name, gender, date of birth and personal identity code and stage name;
- contact information, such as postal address, email address and telephone number;
- country of residence and language of communications;
- client and agreement number, as well as IPN number and ISNI ID;
- date of commencement and termination of the client relationship;
- role as a performer or producer on various recordings and music videos;
- casting as a performer;
- author information of the work;
- separate rights or royalty management authorisations;
- User IDs for the MyGramex portal and other similar services;
- date of death as well as beneficiary information and information on wills, deeds of inheritance and distribution of the estate, as well as gift deeds and deeds of sale;
- memberships in collectives such as orchestras, bands and choirs;
- GramexPress magazine mailing information;
- bank account details;
- tax and foreclosure information;
- determination of remunerations;
- customer relationship or membership in other copyright societies;
- information and authorisations of the representative of the rightsholder;
- recordings and music videos featuring or produced by the rightsholder;
- performer and producer credit information;
- use event information and
- other information related to the client relationship.

As a general rule, information about rightsholders is collected directly from the person themselves or their representatives, such as in connection with the conclusion of a client agreement. Rightsholders and their representatives provide Gramex with performer and producer information. Use event data is collected from user customers and other copyright societies, as well as with the help of external music recognition services. Personal data is also collected from the following sources:

- official registers, such as the registers of the Tax Administration;
- entities managing address information;
- copyright societies and agencies, as well as
- various rightsholder information systems in the recording industry, such as IPD, VRDB2 and RDx, and
- various open sources.

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

The processing of the rightsholders' personal data is necessary for at least the term of copyright of the recording and music video. According to the Copyright Act, a recording is protected until 70 years have passed since the recorded performance was first published. According to the Copyright Act, a music video is protected until 50 years have passed since the recording was first released.

It is the purpose of Gramex to further the general preconditions for the development of the Finnish creative musical art and phonogram production. One dimension in the realisation of this purpose is to cherish historical information about published recordings that are not collected elsewhere. For example, the recording reports submitted to Gramex form a culturally historically significant entity.

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. Users of the MyGramex portal can check, correct and update their information themselves through the portal.

### **Transfer of personal data**

Collection of royalties and data management. Primarily, the personal data of the rightsholders will not be disclosed or transferred outside the EU or the EEA. If Gramex has a legal basis to collect remunerations for the rightsholder from outside the EU or EEA area, the necessary information can be disclosed or transferred to the extent necessary to collect compensation.

Information is transferred to international information systems that support and perform the collection of royalties and accounting, such as the IPD register maintained and managed by SCAPR and the VRDB2 system, the RDx service and the ISNI register. Information is also transferred to other copyright societies and other cooperative organisations to collect royalties and manage recording data in accordance with industry practices.

In addition, information is transferred to the extent required by the development and maintenance of the distribution system to its technical implementers.

My Gramex portal users. In the portal, rightsholders can see the names of the rightsholders related to their recording or music video, as well as more detailed information about themselves. This information is used to distribute copyright compensation among the rightsholders, and it is important that all parties have the opportunity to check the correctness of the information.

Authorities. Gramex can hand over the personal data of rightsholder members to the authorities as required by the applicable legislation at any given time. Gramex regularly discloses information to, for example, the Tax Administration and execution authorities.

Collection and enforcement of rights. The personal data of rightsholder members 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.

External service providers. Gramex uses service providers who process the personal data of rightsholders as part of the service they provide to Gramex. One major service provider that handles the personal data of rightsholders is a company that develops and maintains a rights management system. Contractual arrangements with all service providers that process personal data have ensured that personal data is processed in accordance with current legislation.

Research activity. Gramex can hand over performer and producer information for recordings and music videos to third parties for research and archiving purposes supporting Gramex's operations or for statistical purposes.

Transfer outside the EU and EEA. As a matter of principle, Gramex does not transfer or hand over personal data outside the EU or EEA, or to countries without an adequate level of data protection, as determined by the Commission. The personal data of the rightsholders can be handed over or transferred to other copyright societies and other cooperation bodies for the purposes necessary for the collection, settlement and payment of copyright royalties and for the administration of rights. When transferring and handing over personal data, protective measures and transfer criteria according to data protection legislation are followed. If personal data is transferred outside the EU and the EEA, and the Commission has not determined an adequate level of data protection for the country in question, both parties to the transfer shall follow the standard clauses approved by the Commission to guarantee an adequate level of data protection. [Link to Standard Contractual Clauses \(SCC\) approved by the Commission.](#)

## **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.