

Privacy Policy

Copydan Tekst & Node
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DK
Company registration number: 18463504

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1. Introduction

- 1.1 This data protection and privacy policy (the "**Policy**") describes how Copydan Tekst & Node ("**us**", "**we**" or "**our**") processes and protects personal data from external stakeholders. It is relevant for you to read this Policy if you are a rightsholder, customer, supplier or another stakeholder.
- 1.2 The Policy is prepared and made available to comply with the general data protection regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. Collecting personal data with cookies

- 2.1 By visiting and using our website(s), cookies are collected and used on the basis of consent. Information in these cookies include a session cookie which is necessary for the website to function properly during your visit. This cookie does not collect any personal data about you and it is deleted when you close your browser.

Cookies on tekstognode.dk:

- Google Analytics to measure and document traffic on the website.
- gstatic.com to make it easier for Google to service the website.
- cloudflare.com to ensure optimisation of browsers.
- addtoany.com to facilitate the sharing of website content on social media.

Copydan Writing regularly has access to statistical data on visitors. We are not able to identify individuals based on these data. The data are only used internally in connection with the operation of our website, for preparing statistics and to improve the user experience.

Cookies on C-Selv, tekstognode-online.dk:

- Session State to preserve the user state during the entire visit to the website (e.g. whether you are logged in or not or that you stay logged in when navigating the website).
- gdpr_login to ensure that you are given information about how we process personal data.

Registration with Copydan Writing via C-Selv involves the following cookie:

- gdpr_registration to ensure that you are given information about how we process personal data. (hereinafter "**Cookiedata**").

- 2.2 Cookiedata is used for improvement of the website(s) and the user experience.
 - 2.3 Use of cookies for the purpose of collecting personal data is in accordance with the Cookie Order (No. 1148 of 9 December 2011), section 3.
 - 2.4 If you wish to limit or decline the cookies placed on your computer when visiting our website you can do so at any time by changing your browser settings. However, you
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should be aware that if you decline or reject cookies it will impact the functionality of the website which means that there are features on the website that you will not be able to see. Any browser allows that you delete cookies collectively or individually. How this is done depends on the used browser. Remember to delete the cookies in all browsers, if you use several different browsers.

- 2.5 We disclose and/or share Cookie Data with Google Analytics to measure and document traffic on www.tekstognode.dk. We do not use Google Analytics in our self-service module, C-Selv.

3. **Types of personal data processed**

- 3.1 We process personal data on rightsholders as part of our management of copyrights in the text area. In addition, we process personal data on contact persons with our suppliers, customers and other stakeholders as part of the performance of our agreements. Finally, we process personal data when you visit our websites or when you submit personal data to us in writing, through personal contact or via our online self-service system, C-Selv.

RIGHTSHOLDERS:

We collect and process personal data on Danish and foreign rightsholders. What data we process and to whom we disclose them depend on the rightsholders' nationality.

Rightsholders domiciled in Denmark and Greenland:

We collect and process personal data such as name, occupation, address, telephone number, email address, works data and data concerning beneficiaries/representatives, if relevant.

In some cases, we collect and process sensitive personal information, if this is clearly publicly available and necessary for a later correct identification of the rightsholder. The rightsholder is informed of this in connection with a possible inquiry in order to pay remunerations. This is done according to the Regulation's Article 14, 5.

In connection with the distribution of remunerations, we also collect and process data concerning civil registration (CPR) numbers.

When you log into C-Selv we store your login data, including data on IP address, time and date of the session and user name.

Rightsholders not domiciled in Denmark and Greenland:

We collect and process general personal data such as name, nationality, date of birth, email and works data.

Generally, we do not collect contact and payment data on foreign rightsholders. We only do so in cases where foreign rightsholders request to receive remuneration directly from us and not via our foreign sister companies.

Foreign rightsholders do not have access to the C-Selv system. Instead the rightsholders must contact the relevant foreign sister company or us if they have

questions regarding payments etc. A list of the foreign companies that pay remuneration to the rightsholders on behalf of Copydan Writing is available on Copydan Writing's website.

CUSTOMERS:

We collect and process data on name, occupation, telephone number, email address and place of work. When you log into C-Selv we store your login data, including data on IP address, time and date of the session and user name.

SUPPLIERS:

We collect and process general personal data such as name, occupation, telephone number, email, place of work and central business registration (CPR) and civil registration (CPR) numbers.

OTHER BUSINESS PARTNERS:

We collect and process general personal data such as name, occupation, telephone number, email and place of work.

- 3.2 When it is relevant, personal data is collected directly from you or from external sources. **RIGHTSHOLDERS:**

Rightsholders domiciled in Denmark and Greenland:

The personal data we process on rightsholders are, in addition to as described above, collected through reporting from customers, searches in national and international bibliographical databases and through searches on the Internet. Data concerning civil registration (CPR) numbers are always provided by the individual rightsholder, e.g. through registration in our self-service system, C-Selv, or by forwarding a registration form.

Rightsholders not domiciled in Denmark and Greenland:

The personal data we process on foreign rightsholders are collected through reporting from customers, searches in national and international bibliographical databases and through searches on the Internet.

CUSTOMERS:

The general personal data we process on customers are, in addition to as described above, collected via employers and/or third parties as well as from public authorities.

SUPPLIERS:

The general personal data we process on suppliers are, in addition to as described above, collected via employers and/or third parties as well as from public authorities.

OTHER BUSINESS PARTNERS:

The general personal data we process on other business partners are only collected via you and your visits to our websites.

- 3.3 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by our updating of this Policy.

4. **Purposes for processing the personal data**

- 4.1 We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:

We only process your personal data for legitimate purposes in compliance with GDPR. Depending on the circumstances, the personal data may be used for the following purposes:

RIGHTSHOLDERS:

We collect your personal data with the purpose of registering and subsequently distributing remuneration to the individual rightsholder. We have a statutory obligation to distribute payable remunerations directly to the individual rightsholder as far as possible.

In connection with the distribution of remunerations, data concerning the individual rightsholder are verified through the CPR Register. This way, we ensure an unambiguous identification of the individual rightsholder.

We store your login data from C-Selv to ensure the best possible protection of your and other users' security. In case of a security breach we must be able to identify who were logged in at the time in question and notify them. We also store your login data in order to be able to identify sources of error if you as a user experience problems during your login session.

CUSTOMERS:

We collect your personal data with the purpose of managing our agreements and invoicing as well as for the purpose of ongoing customer communication, including questionnaire surveys which are part of the agreement between us and the customer.

SUPPLIERS:

We collect your personal data with the purpose of managing our agreements, including purchasing, paying invoices and delivering services.

OTHER BUSINESS PARTNERS:

We collect your personal data if you contact us or if you visit our websites. The purposes are documentation and statistics.

5. **Legal basis for processing personal data**

- 5.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) The processing is necessary for the performance of a contract to which the data subject is party, cf. the GDPR, article 6(1)(b), the first indent.
- b) The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract, cf. the GDPR, article 6(1)(b), last indent.
- c) The processing is necessary for compliance with applicable legislation, cf. the GDPR, article 6(1)(c).
- d) The processing is necessary for the purposes of the legitimate interests where

such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f).

6. **Disclosure and transfer of personal data**

6.1 We only pass on personal data to others when the law allows it or requires it, including when relevant and asked to do so by you or a data controller when applicable.

6.2 We transfer personal data to the following recipients from the EU/EEA:

- a) Tax authorities (for example in connection with accounting etc.)
- b) Banks (for example in connection with payments etc.)
- c) Data processors
- d) Suppliers
- e) Collaborators

6.3 RIGHTSHOLDERS:

Rightsholders domiciled in Denmark and Greenland:

Remunerations are paid through our banker, using the NemKonto or the account number provided by the rightsholder. Rightsholders receive a specification in their e-Boks (secure digital mailbox) in connection with the distribution.

We have a statutory obligation to disclose data on civil registration (CPR) numbers in connection with reporting to the Danish tax authorities. Civil registration (CPR) numbers are therefore only disclosed to those of our business partners whose task it is to ensure a correct and lawful transfer of remunerations to the correct recipients. Please feel free to contact us if you wish to know to what stakeholders we disclose data concerning civil registration (CPR) numbers.

We disclose necessary data on authors of visual art to VISDA (Visual Rights in Denmark). Data are disclosed concerning the authors of visual art who have received remunerations from us in the distribution year in question. Data are disclosed for the purpose of managing rights, including distribution of remunerations, in the visual arts area.

If you contact us in relation to personal matters, you must identify yourself by stating your full name, address and date of birth. We only disclose data pertaining to yourself.

If you contact us wishing to obtain information about a spouse or another person, we need a signed power of attorney from the rightsholder in order to give you any information.

In case of individual enquiries, your data are disclosed if the enquiry is deemed to be in your interest. This could e.g. be a publishing house requesting to use your material or in other cases where our agreement does not cover the use of your material. We disclose your address, email and/or telephone number. You may contact us by telephone + 45 35 44 14 93 if you do not want us to disclose your contact details for these purposes.

Rightsholders not domiciled in Denmark and Greenland:

Data concerning foreign rightsholders are, to the extent necessary, disclosed to foreign management organisations based on bilateral agreements concluded. We only disclose such data with the purpose of distributing remunerations.

We disclose necessary data on authors of visual art to VISDA (Visual Rights in Denmark). Data are disclosed concerning the authors of visual art who have received remunerations from us in the distribution year in question. Data are disclosed for the purpose of managing rights, including distribution of remunerations, in the visual arts area.

CUSTOMERS:

When we disclose data, we have concluded the necessary agreements with the partners and stakeholders in question.

SUPPLIERS:

When we disclose data, we have concluded the necessary agreements with the partners and stakeholders in question.

OTHER BUSINESS PARTNERS:

When we disclose data, we have concluded the necessary agreements with the partners and stakeholders in question.

- 6.4 From time to time we use external companies as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processor agreement in accordance with the requirements hereto under GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis which the external parties are obligated to inform about unless the applicable legislation allows otherwise.
- 6.5 We transfer personal data to countries or international organisations outside the EU/ EEA. We transfer personal data to the USA. Such transfers are based on the recipients self certifications under "EU-U.S. Privacy Shield". Read more about Privacy Shield on the websites of the national authorities or at www.privacyshield.gov. As a consequence of the Schrems II-judgment, it is expected that a new framework that fully complies with EU data protection law will be secured in the future. We transfer Personal Data to Canada. The basis for such a transfer is an adequacy decision by the European Commission, which generally provides for adequate data protection through legislation or through other measures. Personal data is transferred to the following countries: Australia, India, South Africa.. Such transfers are based on the standard contractual clauses about data protection made or approved by the EU Commission and possibly approved by a national supervisory authority, ensuring a sufficient level of protection.
- 6.6 If you have any questions about our use of data processors, cooperation with other data controllers, including subsidiary companies, or transferring of data to third countries, please contact us for more information or documentation of our legal basis for said transfers.

7. Erasure and retention of personal data

- 7.1 We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We also retain personal data to the extent that it is an obligation from applicable law, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned in section 10 of this Policy.

8. Data subject rights

- 8.1 Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:
- 8.1.1 The right of access: Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.
 - 8.1.2 The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.
 - 8.1.3 The right to erasure: In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.
 - 8.1.4 The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.
 - 8.1.5 The right to object: Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data.
 - 8.1.6 The right to data portability: Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.
- 8.2 More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data

and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

9. **Changes to this Policy**

- 9.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

10. **Contact**

- 10.1 If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at persondata@copydan.dk, +45 35 44 14 02.
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