

Privacy Policy

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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, cookies are collected and used based on your consent. Information about the usage can be found here: www.tekstognode.dk/cookies.

3. Types of personal data processed

- 3.1 We process personal data about you when this is necessary and in accordance with the applicable legislation.
- 3.2 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 website or when you submit personal data to us in writing, through personal contact or via our online self-service.

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 our online self-service, we store your login data, including data on IP address, time and date of the session.

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.

CUSTOMERS:

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

SUPPLIERS:

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

- 3.3 Depending on the circumstances and only when it is strictly relevant and necessary, we may process special categories of personal data (so-called "sensitive personal data"). These personal data include:
- a) information on one or more people's political tendencies or beliefs
 - b) information about a person's religious or philosophical beliefs or preferences
 - c) information about the union membership of one or more persons
- 3.4 We process these sensitive personal data for the following purposes: Correct identification of rightholders.
- 3.5 When 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 online self-service, 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 website.

- 3.6 If we need to collect more personal data than specified above, we will inform you by updating this Policy.

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

- 4.1 We will only process your personal data if we have a legitimate purpose and in that case in accordance with the rules of the GDPR.
- 4.2 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 our online self-service 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 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 website. 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 a party in accordance with 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 in accordance with GDPR, Article 6(1)(b), last indent.
- c) The processing is necessary to comply with applicable legislation in accordance with 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 in accordance with GDPR, Article 6(1)(f).

5.2 When it is strictly relevant and necessary, sensitive personal data (the “special categories of personal data”) listed in the GDPR, Article 9(1), may be processed. In such case the processing will only take place when permitted by the GDPR, Article 9(2) to Article 9(4), including but not limited to the following instances:

- a) The processing relates to personal data, which clearly has been made available by the data subject in accordance with GDPR, Article 9(2)(e).

6. Disclosure and transfer of personal data

6.1 We only transfer personal data to other entities when it is legally permitted or required.

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) 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 eBoks (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 entities as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless applicable law allows for such transfer and processing.
Where the external parties are acting in the role of processors, the processing is always based on a data processing agreement in accordance with the requirements under GDPR.
Where the external parties are acting in the role of controllers, the processing of personal data is based on such external parties' data privacy policy and the relevant legal bases 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 following countries on the basis of the European Commissions adequacy decisions under article 45:
- a) Canada
 - b) Switzerland
 - c) United Kingdom

As such adequate data protection is guaranteed through legislation or through other measures. Personal data is transferred to the following countries not subject to an article 45 adequacy decision: 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 data protection agency, ensuring a sufficient level of protection.

- 6.6 If you have any questions about our use of processors, cooperation with other controllers, including our subsidiaries, or the transfer of data to third countries, you may contact us for more information or documentation of our legal basis for such transfers.

7. Erasure and retention of personal data

- 7.1 We ensure that the personal data is deleted when it is no longer necessary for the processing purposes described above. However, we retain your personal data to the extent that we are legally obligated, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of your personal data, you may contact us by using the email mentioned in the last section of this Policy."

8. Data subject rights

- 8.1 As a data subject under GDPR, you have a number of rights.
- 8.1.1 You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.
- 8.1.2 You have the right to have incorrect information rectified.
- 8.1.3 You have the right to have certain personal data deleted.
- 8.1.4 You may have the right to restriction of our processing of your personal data.
- 8.1.5 You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.
- 8.1.6 You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision (1) is necessary for entering into, or performance of a contract between you and the Organization, (2) is authorised by law, or (3) is based on your explicit consent.
- 8.1.7 If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal.
- 8.1.8 You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- 8.1.9 You can always lodge a complaint with the data protection authority.

- 8.2 Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.
- 8.3 More information about data subject rights can be found in the guidelines of the national data protection authorities.
- 8.4 Please use you the contact details below if you want to use your rights.
- 8.5 We try to meet your wishes about our processing of personal data, but you can always file a complaint to the 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 top of this Policy. If we make significant changes, we will provide notification by way of a visible notice, for example on our website or by direct message.

10. **Contact**

- 10.1 You may contact us at the below specified email if you:

- a) disagree with our processing or consider our processing of your personal data infringes on the law,
- b) have questions or comments to this Policy, or
- c) want to invoke one or more of your rights as a data subject described in this Policy.

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@tekstognode.dk, +45 35 44 14 02.