Privacy Policy

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1. Introduction

This 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, a customer, a supplier, if you have registered to subscribe to our newsletter, if you are a potential customer or if you are otherwise a stakeholder.

The Policy also covers the processing of personal data in connection with our digital platforms, including our websites, www.tekstognode.dk and www.fairlicens.dk, and our use of digital systems for managing customer and stakeholder relations, including the CRM system HubSpot, our newsletter platform Brevo and the analysis tool Piwik Pro.

The Policy has been prepared and made available as part of our compliance with the General Data Protection Regulation (2016/679 of 27 April 2016) (”**GDPR**”) and its rules on the obligation to provide information.

2. Collection of data using cookies

When you visit our websites, www.tekstognode.dk and www.fairlicens.dk, we may collect and process personal data by means of cookies and similar technologies.

Among other tools, we use the web analysis tool Piwik PRO to analyse the use of our website, understand user behaviour and improve the user experience.

In addition, we collect data on user behaviour on our websites by means of marketing cookies. We use these data to show personal and relevant advertisements (retargeting) on other platforms.

Collection and processing take place in compliance with applicable rules governing cookies and the processing of personal data. If required under applicable law, the collection and processing take place based on consent via our cookie and consent solution.

Information about this processing is available on our websites:

www.tekstognode.dk/cookies and www.fairlicens.dk/cookies

3. Types of personal data processed

3.1 General personal data

We process personal data about you when relevant and in compliance with applicable legislation.

We process personal data about rightsholders as part of our management of copyrights in the text and sheet music area. These personal data also include pictures used in connection with text.

We process personal data about contact persons with our customers, potential customers, suppliers and other stakeholders as part of the performance of our agreements.

In addition, we process your personal data when you visit our websites or when you submit personal data to us in writing, through personal contact, via forms on our websites or via our online self-service system.

• RIGHTSHOLDERS •

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

We process personal data about children when this is necessary for the management of rights and distribution of remuneration. Such processing is based on the relevant legal basis for processing data under the GDPR and takes place with due regard to the specific protection merited by children. The data are only used for the management of rights and distribution of remuneration.

•• Rightsholders domiciled in Denmark and Greenland
We collect and process general personal data such as name, nationality, date of birth, occupation, address, telephone number, email address, works data and data concerning date of death, beneficiaries or representatives, if relevant.

In connection with the payment of remuneration, we collect and process data concerning civil registration (CPR) number and tax identification number (TIN).

•• Rightsholders not domiciled in Denmark and Greenland
We collect and process general personal data such as name, nationality, date of birth, occupation, email address, works data and data concerning date of death, if relevant.

Generally, we do not collect contact and payment data about 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. In such cases, the same guidelines apply as for rightsholders domiciled in Denmark.

• CUSTOMERS •
We collect and process data such as name, occupation, telephone number, email address and place of work as well as data on contact and interaction in connection with the sending of email marketing.

• POTENTIAL CUSTOMERS/LEADS •
We collect and process general data such as name, occupation, telephone number, email address and place of work. If you have signed up for our newsletters or other electronic marketing, we also process data on receipt of our emails, including open rates, click-through rates and unsubscriptions.

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

• OTHER BUSINESS PARTNERS •
We collect and process general personal data such as name, occupation, telephone number, email address and place of work.

• SPECIFICALLY CONCERNING SUBSCRIBERS TO TEKST & NODE'S NEWSLETTER •
We collect data on the name and email address of the subscriber based on consent. The data are necessary for us to be able to send the newsletter. The data are stored encrypted by the newsletter platform Brevo and are accessible to us until the subscriber actively unsubscribes from the newsletter or until the newsletter ceases to be published. After that, they will be erased.

When registering to subscribe to the newsletter, data on the subscriber's online behaviour in connection with receipt of the newsletter are collected. These data are only used for editorial purposes for preparing and planning future content for the newsletter. The collection of data about the subscriber's online behaviour is based on the subscriber's consent. When registering to subscribe to the newsletter, the subscriber is informed about the use of spypixels used by Brevo. We access the data via Brevo and they are restricted to comprising information about whether the subscriber opens the newsletter and on what articles the subscriber clicks. Data about behaviour generated using spypixels are stored encrypted until the subscriber actively unsubscribes or until the newsletter ceases to be published. After that, they will be erased.

We disclose the above data to our partner, Peytz, which manages the integration of Brevo on our website.

We also transfer the above data to our newsletter platform Brevo. Brevo's servers are located inside the EU, and no data are transferred overseas. However, Brevo does use support departments not based in the EU to support their customers, but they do not have access to subscriber data or data concerning their online behaviour.

Subscribers may withdraw their consent at any time. When a subscriber withdraws consent, we cease to send the newsletter to the subscriber and we erase all information and data as described above. The withdrawal only affects the future processing of the personal data collected and thus not the lawfulness of the processing based on the consent before the withdrawal.

• SPECIFICALLY ABOUT OUR CRM SYSTEM TO CUSTOMERS AND POTENTIAL CUSTOMERS AND THE USE OF HUBSPOT •
We use HubSpot as our CRM and marketing platform for management of customer relations, communication with customers and potential customers as well as for sending information about our services, events, webinars, offers and news.

For customers, we collect and process data such as name, occupation, telephone number, email address, place of work as well as data on our dialogue and cooperation. The data are used for management of the customer relation, ongoing communication and planning of relevant activities and follow-up.

For potential customers, we collect and process similar data when they register for a webinar, download material, complete contact forms, sign up for marketing or in any other way request to receive information from us. The data are used to process the enquiry, manage consents and send relevant information about our activities, services, offers and news.

If a customer or potential customer has consented to receive electronic marketing, we process information about the consent and data on receipt of our emails. This may include information about whether an email was opened, which links were clicked on, registration for events and webinars and other interaction with our communication. The data are used to manage consents, document marketing consents and adapt the content of our communication in order for it to be experienced as relevant by the recipient.

Marketing activities can, among other activities, include automated emails and communication flows sent based on consent and be part of planned activity and communication flows. Examples are invitations for webinars, information about new services, subject-matter content, offers or other relevant information.

The data are stored in HubSpot, which is our data processor. This means that HubSpot processes the data on our behalf with a view to CRM management, management of consents, sending of emails, registration of communication and analysis of the recipients' interaction with the material sent.

HubSpot is also used for registration, storage and management of marketing consents and documentation of giving and, if relevant, withdrawal of such consents.

The data are protected through technical and organisational measures in compliance with the processor agreement concluded.

We store the data as long as necessary to manage the customer relation or the ongoing dialogue with the potential customers or as long as a marketing consent is active. When the data are no longer necessary for these purposes, or when a consent is withdrawn, the data are erased or anonymised in compliance with our internal erasure procedures.

Customers and potential customers may withdraw their consent to electronic marketing at any time. When a consent is withdrawn, we stop sending marketing material to the customer or potential customer in question. The withdrawal only affects the future processing of personal data based on consent and does not affect the lawfulness of the processing carried out before the withdrawal.

3.2 Sensitive data

In certain cases and where strictly relevant and necessary, we may process special categories of personal data (also called "sensitive data") about you. Such data comprise:

• Data concerning a person's religious or philosophical beliefs

• Data concerning a person's trade union membership

• Data concerning a persons' political tendencies or opinion

We only collect and process sensitive data if such data are clearly publicly accessible and necessary in order to ensure unambiguous and correct identification of rightsholders and thus avoid confusion of names. The legal basis for doing so is Article 14(5) of the GDPR.

3.3 Sources

We collect personal data directly from you and, if relevant, from publicly accessible, external sources.

• RIGHTSHOLDERS •

•• Rightsholders domiciled in Denmark and Greenland
Personal data are collected when reported by customers, through searches in national and international bibliographical databases, enquiries with co-authors and publishing houses and through searches in publicly accessible sources on the Internet.

In connection with succession and the identification of beneficiaries and correct distribution of remuneration, we obtain data from the Probate Court, executors, administrators and attorneys in certain cases.

Furthermore, we receive data from our foreign sister companies with which we have concluded bilateral agreements, and from organisations on behalf of which we distribute remuneration.

Data concerning civil registration (CPR) numbers are provided by the individual rightsholder themself. This is done through registration in our online self-service system or by forwarding a registration form. In certain cases, we receive civil registration (CPR) numbers from executors, administrators or attorneys in connection with probate and succession. The purpose is to ensure unambiguous and correct identification of the rightsholders concerned.

•• Rightsholders not domiciled in Denmark and Greenland
Personal data on foreign rightsholders are collected when reported by customers, through searches in national and international bibliographical databases and through searches in publicly accessible sources on the Internet.

• CUSTOMERS •
The general personal data we collect from external sources are received from employers and/or third parties as well as from public authorities.

• SUPPLIERS •
The general personal data we collect from external sources are received from employers and/or third parties as well as from public authorities.

• OTHER BUSINESS PARTNERS •
The general personal data we collect from external sources are received from cookies in connection with visits to our website.

• NEWSLETTER SUBSCRIBERS •
We only collect personal data based on consent in connection with registration as subscribers to our newsletter.

If we need to collect and process personal data additional to what is described above, we will provide information to this effect when we collect the personal data. Such information may also be provided by updating this Policy.

4. Purpose of processing personal data

We only process your personal data if we have a legitimate purpose and, in such case, we do so in compliance with the GDPR rules.

• RIGHTSHOLDERS •
We process personal data with the purpose of registering and subsequently distributing remuneration to the individual rightsholder for the exploitation of their copyrights.

• CUSTOMERS •
We process personal data for administrative purposes, to manage agreements and perform 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.

We also process personal data to be able to send campaign emails, offers or loyalty emails to our customers as part of a comprehensive email marketing strategy.

If the processing takes place with a view to marketing, including the sending of newsletters, offers or other commercial communication, such processing is exclusively based on a valid consent where required under applicable law.

• POTENTIAL CUSTOMERS/LEADS •
We process personal data about potential customers with a view to being able to respond to enquiries, follow up on interest in our services, prepare quotations, establish new customer relations and communicate relevant information.

We also process personal data to be able to send campaign emails, offers or loyalty emails to our customers as part of a comprehensive email marketing strategy.

If the processing takes place with a view to marketing, including the sending of newsletters, offers or other commercial communication, such processing is exclusively based on a valid consent where required under applicable law.

• SUPPLIERS •
We process personal data with the purpose of managing our agreements, including purchasing, paying invoices and delivering services.

• OTHER BUSINESS PARTNERS •
We process personal data in connection with enquiries and visits to our website. The purposes are documentation and statistics.

• NEWSLETTER SUBSCRIBERS •
We collect personal data in connection with subscription to our newsletter. The purpose is to be able to send a newsletter to those who wish to receive it.

5. Legal basis for processing personal data

5.1 General personal data

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

- Consent
- Processing is necessary for the performance of a contract with the data subject
- Processing is necessary to pursue a legitimate interest that is not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data
- Processing is necessary to take steps at the request of the data subject prior to entering into a contract
- Processing is necessary for compliance with applicable legislation (e.g. relating to bookkeeping)

5.2 Sensitive data

When relevant and strictly necessary, sensitive data (the "special categories of personal data") mentioned in Article 9(1) of the GDPR are processed. In such case, processing will only take place if permitted under Article 9(2) to (4) of the GDPR, including in the following case:

- Processing only concerns personal data that are publicly accessible.

6. Disclosure and transfer of personal data

We only disclose personal data when so permitted or required by legislation, including when relevant and upon a specific request from you or the controller to that effect.

We disclose personal data to the following recipients:

- Banks (e.g. in connection with making and receiving payments etc.)
- Processors
- Suppliers
- Business partners
- The Danish tax authorities (e.g. in connection with bookkeeping etc.)

• RIGHTSHOLDERS •
•• Rightsholders domiciled in Denmark and Greenland
When we disclose data, we have concluded the necessary agreements with the stakeholders in question.

We disclose necessary data about authors of visual art to VISDA (Visual Rights in Denmark). Data are disclosed for the purpose of managing rights, including distribution of remunerations, in the visual arts area.

To the extent personal data are transferred to recipients outside the EU/EEA in connection with the payment of remuneration to foreign bank accounts, we do so exclusively based on a valid transfer mechanism in compliance with the data protection legislation, including the European Commission's standard contractual clauses or a valid adequacy decision.

If a rightsholder contacts us in relation to personal matters, the rightsholder must identify themself by stating their full name, address and date of birth. We only disclose data pertaining to the rightsholder themself.

If other persons contact us wishing to obtain information about a spouse or another person, we need a signed power of attorney from the rightsholder as a general rule. The person granting the power of attorney can withdraw it at any time.

In case of individual enquiries from third parties, we can disclose contact data for a rightsholder if it is our assessment that the enquiry is relevant to the rightsholders' professional activities and has a legitimate purpose, e.g. a request to use works or contact concerning rights. The data disclosed are restricted to the data necessary for the specific purpose. Rightsholders may contact us by telephone + 45 35 44 14 93 if they do not want us to disclose data to third parties.

• • Rightsholders not domiciled in Denmark and Greenland
Data concerning foreign rightsholders are, to the extent necessary, disclosed to our foreign sister companies and partner organisations that manage and administer copyrights and related rights. Such disclosure is based on bilateral agreements concluded and only with the purpose of distributing remunerations.

We disclose necessary data about authors of visual art to VISDA (Visual Rights in Denmark). 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 stakeholders in question.

• SUPPLIERS •
When we disclose data, we have concluded the necessary agreements with the stakeholders in question.

• OTHER BUSINESS PARTNERS •
When we disclose data, we have concluded the necessary agreements with the stakeholders in question.

Generally, we use various external and professional organisations as suppliers and business partners to deliver or assist us in delivering our services and products. The external organisations do not receive or process personal data unless transfer and processing of personal data are permitted by legislation. If the external organisations or business partners are processors on our behalf, their processing of personal data will always take place in accordance with a processor agreement that is in compliance with legislative requirements in this regard. If the external companies or business partners are independent controllers, their processing of personal data will take place in accordance with their own privacy, data protection or personal data policy of which they will provide information, unless otherwise prescribed by legislation.

• SPECIFICALLY ABOUT BUSINESS PARTNERS FOR MARKETING AND ANALYSIS •
We use an external business partner to assist us with marketing and reporting and analysis of our marketing activities and campaigns.

In connection with this cooperation, relevant personal data may be processed, including contact data, data concerning interactions and data relating to marketing and digital platforms.
The processing is based on:

- your consent when you have accepted marketing and related processing of your personal data
- existing customer relations when the processing is necessary to follow up on and develop our legitimate interest in existing customers relations, develop our services and evaluate the effect of our marketing activities.

We have concluded a processor agreement with our business partner. The processor agreement ensures:

- that personal data are only processed upon our instruction
- that the processing takes place with a clearly defined purpose
- that access to data is restricted to relevant persons
- that adequate technical and organisational measures have been implemented.

We regularly follow up to make sure that our business partner complies with applicable data protection legislation.

• OTHER EXTERNAL BUSINESS PARTNERS •

From time to time we use other external units as suppliers to assist us in the delivery of our services. The external suppliers will not receive or process personal data unless such disclosure and processing are permitted by applicable legislation.

When external parties fulfil the role of processor, the data processing always takes place based on a processor agreement in compliance with the GDPR requirements.

When external parties fulfil the role of controller, the data processing takes place in compliance with the external parties' privacy policy and the relevant basis of processing of which the external parties are obliged to provide information, unless otherwise permitted by applicable legislation.

6.1 Transfers outside the EU and EEA

We transfer personal data to countries or international organisations outside the EU/EEA when necessary for the delivery of our services or in connection with the use of processors and business partners.

We transfer personal data to the following countries based on the adequacy decisions under Article 45 of the European Commission:

- Canada
- Switzerland
- United Kingdom
- USA (only applies to Data Privacy Framework-certified recipients)

This way an adequate level of protection is ensured through legislation and other measures.

6.2 Questions

If you have questions concerning our use of processors, cooperation with other controllers, including subsidiaries, or transfer of data to third countries, you may contact us for further information or documentation of our basis of processing in connection with such transfers.

7. Erasure and storing of personal data

We make sure that personal data are erased when they are no longer relevant for our purposes of processing as described above. We always store personal data for the amount of time prescribed by applicable legislation, including for use as documentation of our compliance with i.a. the provisions of the Danish Bookkeeping Act.

Data processed in our CRM system, HubSpot, are only stored as long as necessary to fulfil the purposes for which the data were collected, including management of relations with customers and potential customers, follow-up on enquiries, quotations and communication.

Data processed based on consent to marketing are erased or anonymised upon withdrawal of the consent unless we have another legitimate basis for continued processing.

Data collected through analysis tools such as Piwik PRO are stored in compliance with the periods of storage determined for the individual operations and in compliance with applicable data protection rules.

If you have questions concerning the storage or processing of personal data, please feel free to contact us using the email address listed at the end of the Policy.

8. Your rights

As a data subject you have a number of rights:

1. You have the right to request access to see what personal data about you we process, the purpose of the processing and whether we disclose the personal data to other parties.
2. You have the right to have incorrect personal data about you rectified.
3. In certain cases, you have the right to have certain of your personal data erased.
4. In certain cases, you have the right to have the processing of your personal data restricted so that we only store your personal data for a given period.
5. In certain cases, you have the right to object to our processing of your personal data based on reasons and circumstances concerning your situation.
6. You have the right not to be subject to a decision based on automatic processing without human intervention, unless the decision is necessary for your employment with us, or if the making of the decision is authorised through legislation or your explicit consent.
7. If we have obtained your consent to part of our processing of your personal data, you have the right to withdraw such consent at any time. If you choose to withdraw your consent, the withdrawal will have no effect on the lawfulness of the processing based on the consent before the withdrawal.
8. In certain cases, you have the right to so-called data portability of the personal data you have submitted to us.
9. You always have the right to submit a complaint to the Danish Data Protection Agency.

These rights may be subject to conditions or restrictions. This means that you may, for instance, not have a right to data portability in the specific case – this depends on the concrete circumstances of the processing activities.

You can read more about your rights as a data subject on the Danish Data Protection Agency's website.

If you are not satisfied with our processing of your personal data, you have a right to file a complaint with the Danish Data Protection Agency. You can find the Danish Data Protection Agency's contact details and guidance on how to file a complaint on www.datatilsynet.dk.

9. Amendment of this Policy

We reserve the right to update and amend this Policy. If we amend the Policy, we change the date and the version number at the top of the document. In case of substantial amendments, we will notify you by way of a visible notice on our website, by email or by other means of communication.

10. Contact

Please feel free to contact us via our email address below if you:

- disagree with our processing or believe that our processing of your personal data is not in compliance with the legislation
- have questions or comments to this Policy
- wish to exercise one or more of your rights as a data subject.

If you have questions or comments to this Policy, or if you wish to exercise one or more of your rights, please contact us by email to persondata@tekstognode.dk or tel. no. +45 35 44 14 02