

PRIVACY POLICY / CUSTOMER REGISTER

1 Data controller

Audiovisual Producers Finland – APFI ry (hereinafter also “APFI”)
Business ID: 1490962-9
Pasilankatu 2
00240 HELSINKI
Phone: +358 9-440 471

2 Contact person

Janne Lilleberg, CFO
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Email: janne.lilleberg@apfi.fi

3 Name of register

Audiovisual Producers Finland – APFI ry customer register

4 The purpose of use and basis of processing for personal data

As a rule, APFI’s customers are companies. Data subjects include customer companies’ contact persons. If the data subject is a private individual, the information collected on them is similar to that collected for a company’s contact person. For purposes of advance taxation, the customer’s business ID is recorded or, if there is no business ID, the personal identity code of the data subject.

The information in the customer register is used for the collective management of copyrights, which is a statutory obligation. Collective management covers the registration of works, the collection of royalty payments, the calculation and settlement of royalty payments, the fulfilment of tax obligations related to accounts, the settlement of conflicts between copyright holders, and all communication related to the above. The processing is based on a statutory obligation under the Act on the Collective Management of Copyright.

Statistics may be compiled based on the information collected on data subjects, from which it is not possible to identify an individual data subject.

We do not process personal data for automated decision-making that would have legal effects or an otherwise significant impact on the data subject.

5 Data content of the register

The following information on the customer’s contact person can be included in the register:

- name
- email address
- phone number

For private individuals with production copyrights:

- name
- email address
- phone number
- back account information
- personal identity code
- postal address

Changes to all the data types listed above may be processed in the register.

6 Regular data sources

APFI collects personal data directly from the data subject or from their employer.

7 Data storage

We store personal data for as long as necessary for the purposes described in section 4 above. Personal data used for royalty payments is stored for as long as the customer relationship lasts and for 5 years thereafter to enable clarifying any ambiguities in the accounts.

8 Disclosure and transfer of data

Information on copyright holders, including the above-mentioned personal data, is disclosed to other collective copyright management organisations in Finland and internationally, also outside the EU.

Data may be disclosed for analysis, assessment and research related to the audiovisual industry and the copyright system. Data will not be disclosed for marketing purposes.

The data subjects added to the customer register will also be added to the APFI stakeholder register, unless this is prohibited by the data subject.

APFI may use third-party service providers for the processing of data. These third parties, such as IT service providers, process personal data on our behalf and in accordance with our instructions. When we transfer your data to third-party service providers, we have ensured that these service providers are also committed to protecting your privacy in accordance with applicable law.

As a rule, personal data will not be transferred outside the territory of the Member States of the European Union or the European Economic Area unless it is necessary for the purposes of processing the above-mentioned personal data or for the technical implementation of data processing, in which case an adequate level of data protection is ensured, for example, by using standard contractual clauses approved by the European Commission.

9 Protection of the register

The information contained in the register is protected against external data breaches by firewalls, passwords and other technical means. The data and any backups are located in locked spaces to which unauthorised access has been prevented. Only persons designated by APFI have access to the data contained in the register. The persons processing the data may not disclose this information to a third party during their employment relationship or after its termination.

10 Rights of the data subject

In accordance with data protection legislation, the data subject has the following rights:

- right of access to their data;
- right to the rectification of their data;
- right to the erasure of their data;
- right to restrict the processing of their data;
- right to object to the processing of their data; and
- right to lodge a complaint with the supervisory authority if the data subject considers that their personal data has been processed unlawfully.

In order to exercise the rights described above, please contact the contact person whose details are provided in section 2.

11 Amendments to the privacy policy

We reserve the right to update this privacy policy due to a justified change in data processing or changes in governing legislation. We recommend reviewing the content of the privacy policy on a regular basis.