

Privacy Policy

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1. Introduction

- 1.1 This Privacy Policy (the "**Policy**") describes how Copydan Writing ("**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 or a supplier, if you have registered to subscribe to our newsletter or if you are otherwise a stakeholder.
- 1.2 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

- 2.1 When you visit and use our website(s) cookies are placed and used based on consent. The information in these cookies comprises ("**Cookie Data**"):
- 2.2 We use the following cookies on our website, tekstognode.dk:
 - '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.
 - '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, but 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.

We use the following cookies in our online self-service module, C-Selv, tekstognode-online.dk:

- 'Session State' to preserve the user state on the website, i.a. information on whether you are logged in or not and that you stay logged in when navigating the website.
- 'gdpr_login' to ensure that you are given information about how we process personal data.

We use the following cookie in connection with registration with Copydan Writing via C-Selv:

- 'gdpr_registration' to ensure that you are given information about how we process personal data.

- 2.3 Cookie Data are used to improve our website and the user experience.
- 2.4 Use of cookies for collecting data takes place in compliance with section 3 of the Danish Cookie Order (Executive Order No. 1148 of 9 December 2011).

2.5 If you wish to reject or limit the cookies placed on your computer when you visit our website, you can always do so by changing your browser settings. We do, however, point out that refusing or limiting cookies affects the website functionality and will mean that there are website functions that you cannot see or access. All browsers allow the user to delete all or single cookies. How to do this varies from browser to browser. If you use several different browsers, you must remember to delete cookies in all browsers.

2.6 We disclose Cookie Data to:

Google Analytics to measure and document traffic on www.tekstognode.dk. We do not use Google Analytics in our self-service module, C-Selv.

2.7 Below is a list of the duration of the cookies we use:

Cookies on testognode.dk: Being updated.

Cookies on C-Selv: As long as the user remains registered.

Collection of information upon registration for newsletter

When registering to subscribe to Copydan Writing's newsletter, information about the subscriber's name and email address is collected based on the subscriber's consent. This information is necessary in order for us to be able to send the newsletter. We do not collect information about employment or other affiliations. The information is stored by the newsletter platform Brevo, and we have access to the information until the subscriber actively unsubscribes, or until the newsletter ceases to be published, and will subsequently be erased. The information is stored encrypted.

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

We disclose information as mentioned above to our partner Twentyfour which manages the integration of Brevo on our website.

We transfer information as mentioned above to our newsletter platform Brevo. Brevo does not have access to the information collected after the subscriber has unsubscribed or the newsletter ceases to be published. 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

information 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.

3. Types of personal data processed

- 3.1 We process personal data about you when relevant and in compliance with applicable legislation.
- 3.2. We process personal data on rightsholders as part of our management of copyrights in the text area. These personal data also include pictures used in connection with text. 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 your 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.

There are no specific precautions in relation to the collection and processing of personal data about children as this is considered to be in the legitimate interest of the child. Like all other rightsholders, the information is only used in connection with the management of rights and distribution of remuneration.

RIGHTSHOLDERS DOMICILED IN DENMARK AND GREENLAND

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

In certain cases, we collect and process sensitive data if such data are clearly publicly accessible and necessary to ensure subsequent correct identification of the rightsholder. The rightsholder is informed about this processing in connection with enquiries concerning the distribution of remuneration. This is in compliance with Article 3 14(5) of the Regulation.

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

When you log into C-Selv we store your login data, i.a. 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.

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 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.

NEWSLETTER SUBSCRIBERS

We collect and process general personal data such as name and email address.

- 3.3 Depending on the circumstances, and if strictly relevant, we may process special categories of personal data (also termed "sensitive personal data") about you. These data cover
- a) data revealing a person's political tendencies or beliefs
 - b) data revealing a person's religious or philosophical beliefs
 - c) data revealing a person's trade union membership
- 3.4 We process these sensitive personal data with the following purpose: Correct identification of rightsholders.
- 3.5. We collect your personal data from you and, where relevant, from external sources.

RIGHTSHOLDERS**RIGHTSHOLDERS DOMICILED IN DENMARK AND GREENLAND**

External sources comprise reporting from customers, searches in national and international bibliographical databases, enquiries from co-authors and publishing houses and through searches on the Internet.

In connection with succession and the identification of beneficiaries, we obtain data from the Probate Courts and VISDA 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 always provided by the individual rightsholder, e.g. through registration in our self-service system, C-Selv, or by forwarding a registration form. In certain cases we receive civil registration numbers (CPR) from executors, administrators or attorneys in connection with probate and succession.

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.

Furthermore, we receive data from our foreign sister companies with which we have concluded bilateral agreements.

CUSTOMERS

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

SUPPLIERS

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

OTHER BUSINESS PARTNERS

The general personal data we collect from external sources are collected from the logging of visits to our websites.

NEWSLETTER SUBSCRIBERS

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

- 3.6 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. Information may also be provided by updating this Policy.

4. Purpose of processing personal data

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

4.2 RIGHTSHOLDERS

We collect your personal data with the purpose of registering and subsequently distributing remuneration to the individual rightsholder for the exploitation of their copy rights.

To ensure an unambiguous identification of the individual rightsholder, we verify the personal data through the CPR Register.

We store your login data from C-Selv to ensure the best possible protection of your and other users' security. We do so, among other things, to be able to identify who were logged in at the time in question and notify them in case of a security breach. We also

store your login data in order to sources of error if you as a user experience problems during your login session.

CUSTOMERS

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

OTHER BUSINESS PARTNERS

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

NEWSLETTER SUBSCRIBERS

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

- a) Processing is necessary for the performance of a contract with the data subject, see GDPR Article 6(1)(b), first limb.
- b) Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract, see GDPR Article 6(1)(b), last limb.
- c) Processing is necessary for compliance with applicable legislation, see GDPR Article 6(1)(c).
- d) 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, see GDPR Article 6(1)(f).
- e) The basis for processing of the specific personal data is your consent, see GDPR Article 6(1)(a). You can withdraw your consent at any time by contacting us via the contact details listed at the end of this Policy. If you withdraw your consent, the personal data processed based on your consent will be erased, unless they can or must be processed, e.g. to comply with a legal obligation.

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

- a) The processing concerns personal data which have clearly been made public by the data subject, see GDPR Article 9(2)(e).

6. Disclosure and transfer of personal data

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

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

- a) The Danish tax authorities (in connection with bookkeeping etc.)
- b) Banks (in connection with making and receiving payments etc.)
- c) Processors
- d) Suppliers
- e) Partners

6.3 RIGHTSHOLDERS

RIGHTSHOLDERS DOMICILED IN DENMARK AND GREENLAND

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

We disclose necessary data on 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.

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

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 in order to give you any information. The person granting the power of attorney can withdraw it at any time.

In case of individual enquiries, the rightsholder's 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 the material. We disclose your postal address, email address and/or telephone number. Rightsholders may contact us by telephone + 45 35 44 14 93 if they do not want us to disclose the above data.

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 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 Generally we use various external and professional companies as suppliers and business partners to deliver or assist us in delivering our services and products. The external companies do not receive or process personal data, unless transfer and processing of personal data is permitted by legislation. If the external companies or business partners are processors on our behalf, their processing of personal data will always take place in accordance with a data processing 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.
- 6.5 We transfer personal data to countries or international organisations outside the EU/EEA. We transfer personal data to the following countries based on adequacy decisions from the European Commission: Canada, United Kingdom, Switzerland and Japan. The countries thus generally ensure an adequate level of data protection through legislation or through other measures. We transfer personal data to the following countries for which an adequacy decision under Article 45 has not been made: the USA. Such transfers take place based on standard contractual clauses on data protection adopted or approved by the European Commission and possibly adopted by a supervisory authority, including any supplementary measures that have the effect of ensuring a level of protection for the specific transfer that is essentially equal to what is guaranteed within the EU.
- 6.6 Please feel free to contact us for more information, including questions regarding our use of processors, cooperation with other controllers, including subsidiaries, or disclosure of personal data to third countries, or to receive a copy of documentation of the transfer basis.

7. Erasure and storing of personal data

- 7.1 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. If you have questions concerning the storing 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

8.1 As a data subject you have a number of rights:

- 8.1.1 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.
- 8.1.2 You have the right to have incorrect personal data about you rectified.
- 8.1.3 In certain cases, you have the right to have certain of your personal data erased.
- 8.1.4 In certain cases, you have the right to have the processing of your personal data restricted based on reasons and circumstances concerning your situation.
- 8.1.5 In certain cases, you have the right to object to our processing of your personal data based on reasons and circumstances concerning your situation.
- 8.1.6 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.
- 8.1.7 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.
- 8.1.8 In certain cases, you have the right to so-called data portability of the personal data you have submitted to us.
- 8.1.9 You always have the right to submit a complaint to the Danish Data Protection Agency.

8.2. 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.

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

8.4. Please use the contact details below if you wish to exercise your rights.

8.5 We endeavour to comply with your wishes concerning our processing of personal data, but you can always submit a complaint to the Danish Data Protection Authority.

9. Amendment of this Policy

- 9.1 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 bottom 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

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

- a) disagree with our processing or believe that our processing of your personal data is not in compliance with the legislation;
- b) have questions or other comments to this Policy or
- c) 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 on persondata@tekstognode.dk, +45 35 44 14 02.