

PRIVACY NOTICE regarding the registry based on investigating copyright infringements and collecting compensation

1 Controller

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3 The purpose and legal basis for processing

Personal data is collected and processed for the establishment, exercise, defence and resolution of legal claims of the copyright and neighbouring rightsholders represented by Hedman Partners Attorneys-at-Law Ltd. Processing of personal data is necessary for the legitimate interests of the clients of the controller.

Additionally, personal data is used to monitor compensation payments regarding settlements and judgments. Processing personal data to monitor agreed instalments is necessary to for the performance of a contract to which the data subject is party.

The controller does not use personal data for automated individual decision-making.

4 Categories of processed personal data

The controller may process the following personal data:

- IP address used to share copyrighted materials without the permission of the rightsholder;
- timestamp when the IP address has been used for the purpose above;
- peer-to-peer or other file-sharing software used for the infringement;
- Internet service provider used for the infringement;
- any personal data in the log files of the illegal file-sharing;

- information of the shared work, filename and the identifiers of the swarms (*swarm hash*) where the work has been illegally shared;
- name and contact details of the owner / user of the Internet subscription used for the infringement;
- amount and due date of compensation according to a settlement or a judgment;
- basis of compensation liability – settlement agreement or details of the judgment (decision number, date, court);
- enforcement details of compensation, if any;
- information of contacts made on basis of the infringement or the claim (letter/phone call/e-mail etc. date, recipients and similar details);
- other information necessary for resolving the infringement or collecting the compensation;
- the data subject's social security number or date of birth for creating, executing, monitoring and enforcing payment plans made due to the settlement of an infringement.

5 Sources of the personal data

The data subject's name and contact information are received from the Internet service provider which has disclosed them due to a court decision based on section 60 a of the Copyright Act. Obtaining and disclosing personal data is expressly laid down by national legislation which provides appropriate measures to protect the data subject's legitimate interests.

Technical information of the infringement originates from the teleconnection regarding the infringement. The controller receives technical evidence from the rightsholders it represents. Such data consists of electronic messages and traffic data between the infringer and rightsholder, and the controller processes data with the consent of the rightsholder.

Personal data regarding the contacts and settlements are collect from the data subjects. In order to agree on the settlement, it is necessary that the data subject discloses adequate personal data for the fulfil the rights and obligations of both parties.

If the compensation and remuneration for the infringement are in collection and the court requires additional information to uniquely identify the debtor, the controller may request information from the Population Information System if the requirements of the Population Information Act are fulfilled.

6 Retention period

Personal data is stored as long as the compensation claim of the controller's client is executable or when the received personal data is of significance when establishing, exercising, or defending a legal claim. Expiration of a debt based on compensation and remuneration is prescribed in the Act on Expiration of Debt sections 4 and 7, and the final expiration is prescribed in the section 13 a of the Act. Without interruption, a claim for compensation and remuneration expires in three years after the rightsholder has become aware of the person responsible for the infringement or after 10 years from the moment of the infringement provided that the person responsible for the infringement is unknown. Despite the interruption, the debt expires after 20 years from when it became due. Personal data relating to an unsolved infringement shall no longer be retained when the 10-year expiration specified in the section 7 of the said Act has occurred, or should there be grounds for retention thereafter, after the final expiration prescribed in the section 13 a has occurred.

The controller retains personal data regarding settled infringements until the parties have fully fulfilled their obligations under the settlement. Unless agreed otherwise, the controller retains personal data for a maximum of one year after the final compensation and remuneration installment for a possible clarification of any inquiries and claims. The data subject is entitled to request the deletion of data immediately after the performance of his or her obligations. Despite the aforementioned, the information necessary to fulfill the obligations under the accounting legislation may be retained for 6 years starting from the end of the controller's fiscal year.

7 Transfers of personal data and recipients

Personal data is obtained, stored and transferred only within the European Union. Personal data is not transferred outside the European Union or European Economic Area.

Some data processing activities are outsourced to processors Arvato Finance (1730113-3) and Tecxipio GmbH (HRB 712165). The processors process personal data solely according to instructions given by the controller.

Pseudonymised personal data in the technical evidence of the infringement can be disclosed to expert third-parties to be processed on behalf of the processor if the disclosure is necessary for resolving the infringement. Personal data is not disclosed to other parties.

All personal data can be disclosed to the police when filing for preliminary investigation. IP addresses and timestamps are disclosed to the competent court for the filing applications pursuant to

the Copyright Act section 60 a. Information on court decisions may be delivered upon request without erasing any information it contains.

8 Data subjects' rights

The data subject has a right of access to the personal information processed by the controller and to receive a copy of the personal data or receive a confirmation that no personal data is processed. The data subject may not receive information which adversely affect to the rights and freedoms of others. The controller cannot disclose personal information regarding third-parties or pseudonymised technical evidence which could be used to avoid the legal liabilities of the infringer. Additionally, the controller is subject to the Advocates Act section 5 c, which restricts the right to release information relating to a legal claim.

The data subject has the right to request rectification, erasure or restriction of processing, object processing and request data portability. Fulfilling the requests of the data subject requires fulfilling the relevant preconditions. Despite the data subject's request, the controller may process personal data for the establishment, exercise and defence of a legal claim.

Every data subject has the right to lodge a complaint to the supervisory authority, particularly in that EU member state where the data subject is habitually resident or is working in, or where the alleged infringement has happened, in cases the data subject views that personal data processing violates the General Data Protection Regulation of the European Union. The Office of the Data Protection Ombudsman is the supervisory authority in Finland. The contact information to the Data Protection Ombudsman are available at their website, <https://tietosuoja.fi/en/contact-information>.