

PRIVACY POLICY – PPI LICENSEES

1. Who are we?

- 1.1 We are Phonographic Performance (Ireland) CLG (“PPI”). PPI is a company limited by guarantee. Its registered office and headquarters is based in 63 Patrick St, Dún Laoghaire, County Dublin.
- 1.2 PPI is a music licencing company and is registered with the Controller of Patents Designs and Trademarks in accordance with the Copyright and Related Rights Act 2000 (“the Copyright Act”).
- 1.3 PPI administers record company rights in the public performance, broadcasting and cable transmission of their members’ recordings. PPI also collects royalties on behalf of performers.

2. Personal Data

- 2.1 By "Personal Data" we mean any personal data including (without limitation) contact details such as your name, business name, address, telephone number, email and any other data that may be used to individually identify you.
- 2.2 This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your Personal Data and how we will treat it.
- 2.3 For the purpose of the General Data Protection Regulation (the GDPR), the data controller is PPI when it collects licencing income and when it deals with licensees. PPI has appointed the Irish Music Rights Organisation CLG (IMRO) as its agent to collect public performance licencing income and when IMRO acts in this capacity it is the data processor. PPI is joint controller with IMRO in respect of Personal Data when the means and purpose of processing is jointly determined by IMRO and PPI.

3. Privacy Policy

- 3.1 This privacy policy ("Privacy Policy") applies to the use of information that licensees, and organisations representing licensees give us.
- 3.2 By becoming a member of PPI or by using PPI's repertoire as a licensee you agree that any Personal Data that you submit or make available to PPI will be processed in accordance with this Privacy Policy.
- 3.3 If you have any queries in relation to this Privacy Policy please contact us by emailing our data protection contact at GDPR@PPImusic.ie.

4. What personal information do we collect from you? / What use do we make of your Personal Data?

PPI collects, stores and processes your Personal Data for the following purposes:

- 4.1 Dealing with licence applications and licensing issues;
- 4.2 Collecting licencing income

- 4.3 Dealing with any queries submitted by you; (when corresponding with us by phone, e-mail or otherwise, we ask you to disclose only as much information as is necessary to provide you with services or to submit a question / suggestion / comment in relation to our website or our services);
- 4.4 Sharing Personal Data in the manner set out below.

5. What information about you do we obtain from others?

- 5.1 PPI may obtain Personal Data to facilitate collections of licencing income from our agents IMRO and from publicly available sources such as the Companies Office, Facebook, Google etc.

6. Why do we collect this information?

We collect the information in order to properly licence our member's repertoire.

- 6.1 To set your company / business up as a licensee on our systems;
- 6.2 To liaise with you about licences;
- 6.3 To fulfil our statutory function under the Copyright Act which includes an obligation to administer record company rights in the public performance, broadcasting and cable transmission of members recordings and to collect royalties on behalf of performers;
- 6.4 To ensure payment of our invoices.

7. What is the legal basis for the collecting of this Personal Data?

- 7.1 Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract;
- 7.2 Processing necessary for compliance with a legal obligation to which we are subject;
- 7.3 Processing necessary for the purposes of the legitimate interests which we pursue in carrying out our functions as a Music Licencing Company under the Copyright Act where such interests are not overridden by your interests or fundamental rights or freedoms which require the protection of your information.

8. With whom is your Personal Data shared?

PPI shares your Personal Data:-

- 8.1 with our agents IMRO
- 8.2 with third party suppliers and contractors for the purpose of providing you with any services you have requested;
- 8.3 with relevant third parties when required by applicable law; and
- 8.4 with relevant third parties when PPI believes it reasonably necessary in order to investigate, non-payment of licencing income.

wherever such persons and entities are located in the world.

We attach at Schedule 1 a list of all entities with whom your Personal Data is shared.

9. How long do we keep hold of your information?

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted.

10. Do we transfer your data overseas?

PPI does not transfer your Personal Data Overseas.

11. What are your rights with respect to your Personal Data?

You have the following rights:-

- 11.1 The right to access the personal data we hold about you.
- 11.2 The right to require us to rectify any inaccurate personal data about you without undue delay.
- 11.3 The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the Personal Data.
- 11.4 The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- 11.5 The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- 11.6 The right to request a restriction of the processing of your personal data.

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.

You may exercise any of the above rights by contacting GDPR@ppimusic.ie

12. If you want to lodge a complaint

You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commission. The website is www.dataprotection.ie.

13. What will happen if we change our policy?

This notice may change from time to time, and any changes will be posted on our website and will be effective when posted. Please review this notice each time you use our website or our services. This notice was last updated on 25th May 2018.

14. How can you contact us?

Our Data Protection Contact is Alex Callow who may be contacted:-

By phone : 01/2805977
By Post : 63 Patrick Street, Dun Laoghaire, County Dublin
By Email : GDPR@ppimusic.ie

15. Governing Law

This Privacy Policy shall be governed by and construed in accordance with Irish Law.

Schedule 1

We have set out below a list of third parties with whom we may share your data.

<i>Third party name</i>	<i>Description of services provided</i>
IMRO	(Agent) In order to operate our organisation effectively
An Post	Postal Services
Granite	Website Operators
Microsoft Office 365	Email services
One Drive	Cloud services
Helen Sheehy solicitors	Legal services
BLS	Support Legal Services
Crown	Archiving
ERS	Cloud services
Shred-it	Shredding services
Summons Server	Service of summonses
BDO	Audit and accounting services
Relay	Courier services
Printing company	Printing services
Revenue Commissioners	Legal obligation to disclose certain information