

TEOSTO CULTURAL FOUNDATION PRIVACY POLICY

This privacy policy describes the processing of personal data related to the handling and administration of grant applications by the Teosto Cultural Foundation sr ("Foundation" or "We"). Personal data is used solely for the implementation of the application process, supporting decision-making, and managing and monitoring awarded grants in accordance with the principles of the foundation's operations.

1 CONTACT INFORMATION OF THE DATA CONTROLLER

Name: Teosto Cultural Foundation sr

Business ID: 3431198-2

Postal address: c/o Säveltäjän tekijänoikeustoimisto Keilasatama 2 A, 02150 Espoo

Email address: liisa.ketomaki@teostonkulttuurisaatio.fi

2 PURPOSES OF PROCESSING PERSONAL DATA

We process personal data for the following purposes:

Processing, managing, and awarding grant applications

Personal data is processed for handling and managing grant applications submitted to the Foundation. The information collected during the application process is used to identify the applicant, verify their identity, and deliver the grant to the bank account designated by the applicant if they are selected as a grant recipient.

Compliance with legal obligations

We also process personal data to fulfil various legal obligations, including those related to taxation and accounting.

Handling compensation claims and legal processes

Personal data may be processed as necessary for handling compensation claims, debt collection, and legal processes. We may also process data to prevent misuse of our services and ensure information, system, and network security.

3 PROCESSED PERSONAL DATA AND SOURCES OF PERSONAL DATA

The data originates from the person submitting the grant application to the Foundation. The application can be submitted by a music publisher, a representative of the author, or the author themselves.

We process the following personal data of the authors in connection with applications:

- (a) First and last name
- (b) Social security number

- (c) Gender
- (d) Postal address
- (e) Phone number
- (f) Email address
- (g) Bank account number
- (h) Resume
- (i) Purpose of use for the grant

4 LEGAL BASES FOR PROCESSING PERSONAL DATA

Processing is based on the performance of a contract between the data controller and the data subject. The Foundation must identify the data subject and verify their identity for the purpose of awarding the grant.

The Foundation does not use the data subject's personal data for automated decision-making.

We process personal data to comply with our legal obligations, such as those related to taxation and accounting. Sometimes we also process personal data to pursue our legitimate interests. When processing personal data based on our legitimate interests, we weigh our interests against the privacy of the data subjects.

5 RECIPIENTS OF PERSONAL DATA

The Foundation uses entities that participate in the processing of personal data and process personal data on behalf of the Foundation as data processors. The Foundation uses processors for providing the Foundation's grant application portal (Snowball Factory Oy) and for handling the actual grant applications (Suomen Musiikintekijät ry, Music Finland ry and Suomen Säveltäjien Sibelius-rahasto), as well as to transfer the grant to the grantee (Talenom Oyj). Personal data may also be disclosed to authorities in situations where the Foundation has a legal obligation to do so, or in cases of investigating misuse or similar situations.

Data processors are contractually obligated to follow the Foundation's instructions and comply with data protection legislation when processing personal data.

Data processors assisting the foundation:

- (i) Suomen Musiikintekijät ry (Business ID: 0201096-6)
- (ii) Suomen Säveltäjien Sibelius-rahasto (Business ID: 1108348-9)
- (iii) Music Finland ry (Business ID: 2502166-8)
- (iv) Talenom Oyj (Business ID: 2551454-2)
- (v) Snowball Factory Oy (Business ID: 2022424-7)

6 DISCLOSURES AND TRANSFERS OF PERSONAL DATA

The Foundation processes personal data within the European Union. The service providers used by the Foundation also process data within the European Union.

7 DATA RETENTION

We do not retain personal data longer than necessary for the purposes described in this privacy policy. The exact retention period depends on the nature of the data and the purpose of processing, and it varies accordingly.

If the retention of personal data is no longer necessary for the original purpose for which it was collected, we may retain the data if required by law or if it is necessary for our legitimate interests, such as accounting or preparing a legal claim.

8 RIGHTS OF THE DATA SUBJECT

The data subject has the right to access their data and receive information about the processing of their personal data.

The data subject has the right to request that we correct any personal data concerning them that they consider incorrect. The data subject also has the right to request that we complete any data they consider incomplete. The data subject may also request that we delete their personal data. We will delete the data unless we have a basis for continuing to process it.

The data subject may request that we restrict the processing of their personal data, for example, when a request for deletion, correction, or objection is pending and/or when we do not have legal grounds to process their personal data.

The data subject has the right to receive the personal data they have provided to us in a structured and commonly used format.

The data subject can exercise the above rights by contacting the addresses mentioned at the beginning of this privacy policy. We may request additional information necessary to verify the data subject's identity. We may reject requests that are unreasonably repetitive, excessive, or otherwise manifestly unfounded.

9 FILING A COMPLAINT

If the data subject believes that the processing of personal data is contrary to applicable data protection legislation, they can file a complaint with the local data protection authority. In Finland, the local supervisory authority is the Office of the Data Protection Ombudsman (<http://www.tietosuoja.fi>).