



Data Subject Access Request (DSAR) Policy

Website queries

DECEMBER 2021

1. Purpose

ICE Services Ltd (“**ICE Ltd**”), ICE International Copyright Enterprise Germany GmbH (“**ICE GmbH**”) and ICE Operations AB (“**ICE AB**”) (together “**ICE**”, “**we**” or “**our**”) are committed to protecting the privacy and security of your Personal Data.

A data subject access request (“**DSAR**”), in accordance with an individual’s right of access under the General Data Protection Regulation (“**GDPR**”) / UK GDPR, is a request made by an individual for a copy of the Personal Data Processed by an organisation in its capacity as a Data Controller. The purpose of this right is to enable individuals to verify the lawfulness of an organisation processing their information.

This policy sets out ICE’s procedure for handling data subject access requests.

If you are:

- a member of a collective management organisation (“**CMO**”), and/or
- a writer/sub-publisher of a music publisher; and
- your CMO/music publisher is a customer of ICE,

ICE may Process your Personal Data as part of the services it provides to your CMO or music publisher and is therefore a Data Processor (and not a Data Controller) of your information. In light of this, please contact your CMO or music publisher should you wish to submit a DSAR. In accordance with our contractual and statutory obligations, we will then assist your CMO or music publisher in responding to your request.

2. Definitions

“**Personal Data**” means any information relating to an identified or identifiable natural person.

“**Data Controller**” means an organisation that determines the purposes and means of Processing Personal Data.

“**Data Subject**” is any identified or identifiable natural person, whose Personal Data is Processed by the Data Controller responsible for the Processing.

“**Process**”, “**Processed**”, or “**Processing**” is any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. Submitting a request

A request may be submitted via the contact form [here](#). In the message box, please state that you are submitting a data subject access request together with a detailed description of the information you are seeking, including a timeframe to which the request relates. Do also provide any supplementary information that you think may be helpful for us to appropriately handle your request.

Please note that you are under no obligation to provide the foregoing details, and requests may be made verbally, however provision in the proposed format will assist ICE in responding to your request more efficiently.

4. Receiving a request

ICE will aim to provide an acknowledgement of your request as soon as possible and if required, may ask for further information e.g. verification of your identity, or if unclear, greater specification of the information requested. If applicable, we may also advise you of reasons why we cannot comply with your request (see below).

ICE may request proof of your identity where reasonable and proportionate to do so. If requested, please send a photocopy or scanned image of one of the following: passport, driver's licence, national identification card, or birth/adoption certification, to legal@iceservices.com. We will store all identification provided by you in a specific internal folder within ICE's secure IT network, solely for the purpose of verifying your identity. Any identification provided will be deleted following our full response to your request.

Your DSAR will be logged and monitored within a specific internal folder and the Legal Task tracker, both located within ICE's secure IT network.

5. Responding to a request

ICE will respond to your request without undue delay, and no later than one month from receipt of your request. This timeframe may be extended by two months if the request is complex or you have provided several other data requests e.g. related to other Data Subject rights under the GDPR / UK GDPR. We will notify you should we need to extend the timeframe.

If we process large amounts of your Personal Data, and ask you to specify the information or Processing activities to which your request relates, the time limit for responding to the request will be paused until we receive clarification, although we'll provide any supplementary information we can within one month.

In addition to a copy of your Personal Data, ICE will also provide the following information:

- the purposes for which we process your Personal Data;
- the recipients or categories of recipient(s) to whom the Personal Data has been or will be disclosed, in particular where those recipients are in third countries or international organisations;
- where possible, the period for which it is envisaged the Personal Data will be stored, or, if not possible, the criteria used to determine that period (retention period), including DSAR related

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Personal Data*;

- your right to request that ICE rectifies, erases, or restricts the Processing of your Personal Data;
- your right to object to the Processing of your Personal Data;
- your right to lodge a complaint with the relevant Data Protection supervisory body;
- where your Personal Data has not been collected from you, any information available regarding the source of your Personal Data;
- whether we use automated decision-making (including profiling) and information about the logic involved, as well as the significance and envisaged consequences for you should we Process your Personal Data in this manner; and
- the safeguards we have in place where your Personal Data has or will be transferred to a third country or to an international organisation.

*Please note that any DSAR related Personal Data will be stored in a specific internal folder located within ICE's secure IT network.

A member of the ICE Legal team will handle your request which will then be reviewed by another member of the Legal team prior to sending our response. This process will ensure that the correct information is provided to you accordingly.

ICE will respond to your request via email unless you make a reasonable request for such information to be provided in another commonly used format.

6. Fee

A fee will not usually apply but pursuant to Article 12(5) GDPR and UK GDPR, ICE may charge a reasonable fee should the administrative costs of complying with your request be manifestly unfounded or excessive, or if you request further copies of your Personal Data.

7. Refusing a request

ICE may refuse to respond to your request due to the type of information being requested; not being able to verify your identity; or if it is manifestly unfounded or excessive. In respect of the former, examples include where the information is subject to legal privilege or relates to management planning. We will notify you of our refusal to comply, setting out the reasons why; your right to complain to the relevant supervisory authority; and your ability to pursue judicial remedy.

8. Review

This policy will be reviewed on an annual basis.