

PRIVACY POLICY

ISAN International Agency (“ISAN-IA”) is committed to protecting and respecting your privacy. This Privacy Policy contains important information on how we collect, use and protect your personal information.

ISAN-IA’s international operations are facilitated through [ISAN Registration Agencies](#), a network of appointed partner organizations, and cooperation with other stakeholders (producers, collective management organizations, digital platforms, metadata providers, ...) in key media markets in Europe, North America and Australia. This Privacy Policy is based on the data protection laws applicable in Switzerland (where ISAN-IA is established) and in the EU (including the General Data Protection Regulation 2016/679).

PERSONAL DATA WE MAY COLLECT

In order to enable ISAN-IA (hereinafter also referred to as “us”, “we” and “our”) to allocate ISAN identifiers and manage related metadata on behalf of its Registration Agencies and users (hereinafter also referred to as “you” and “your”), ISAN-IA maintains the International Standard Audiovisual Number Registry System (ISAN Registry System). ISAN-IA’s core activities (such as registrations, identifications, lookup, search, matching, and other ISAN services) are processed through and supported by the ISAN Registry System.

The ISAN Registry System may comprise the following information:

1. Personal information: such as user name, address, telephone numbers, and email.
2. Audiovisual Works, and Version information: such as titles, series and episodes details of audiovisual works, and versions.

We may receive such information :

- From you when you fill in the forms available on our website (www.isan.org), in the ISAN Registry System or contact us in writing, by telephone, email or otherwise.
- From your [ISAN Registration Agency](#) when your user account is created, or an ISAN is allocated, or an ISAN is searched.
- From third parties, such as platforms, collective management organizations that match their data against the ISAN registry.
- From publicly available sources, such as company websites or the registry of commerce.

ISAN-IA shall consider that by providing any personal information to ISAN-IA - whether relating directly to you or relating to third parties – you represent and warrant that you have the authority to transfer such personal information to ISAN-IA and to authorize ISAN-IA to process it where necessary in compliance with this Privacy Policy.

HOW WILL WE USE YOUR PERSONAL DATA?

- We process the information we collect as described above for the deliverance and management of ISAN identifiers, entrusted by you to ISAN-IA or an appointed ISAN Registration Agency for the provision of ISAN services. This processing is necessary for the deliverance of the services you have



entered into with ISAN-IA or your ISAN Registration Agency, or in order to take steps at your request prior to entering into such agreement(s). This includes:

- Using your contact details to contact you regarding your registration with ISAN or the administration of your registration(s).
 - Processing your data while performing quality checks or duplicate resolutions in the ISAN registry. A duplicate resolution may arise if you and other ISAN registrant have allocated a different ISAN in respect of the same work.
- We may use your contact details to keep you informed about developments of our activities. This processing is necessary for the legitimate interests of our activity of providing services related to the identification of audiovisual content.
 - We may consult your data and/or use your contact details to contact you in order to validate, correct or enrich the metadata associated to an ISAN you have registered. The processing is necessary for our legitimate interests and that of all ISAN users by ensuring the proper unique identification of audiovisual content.
 - We may process your information, such as your name, address, email address and phone number, while responding to any communications that you send to us by telephone, email or otherwise.

This processing is necessary for the legitimate interests of our audiovisual content identification activity.

- ISAN-IA may process your personal data to comply with any legal obligation or to enforce or apply the ISAN-IA Terms of Use, or any other agreements; or to protect the rights, property, or safety of ISAN-IA, its Members, Registration Agencies, ISO, and/or Registrants, or other third parties.

WHO YOUR PERSONAL DATA MIGHT BE SHARED WITH

In the normal course of our operation we will not disclose your personal data. Occasionally, we may disclose your personal data, to:

- ISAN Registration Agencies serving other registrants involved in a duplicate ISAN in order to facilitate the resolution of such duplicate.
- Your authorized representatives, our business partners, suppliers, agents and sub-contractors. These parties may be engaged for the fulfilment of undertakings we have with you and the provision of support services to us.
- Courts, law enforcement agencies, regulatory bodies, the International Standardization Organization (ISO), auditors and professional advisers to comply with any legal obligation; or for the purposes of fraud prevention; or in order to enforce any agreements; or protect the rights, property, or safety of ISAN-IA, its Members, Registration Agencies, ISO, and/or Registrants, or others; or obtain any related professional advice.

TRANSFERS OF YOUR PERSONAL DATA OUTSIDE OF SWITZERLAND

We may need to transfer your personal data for processing by third parties as described in the Section “Who your personal data might be shared with” above who are located outside of Switzerland. We will take steps reasonably necessary to ensure that your personal data is treated securely, in accordance with this Privacy Policy and Swiss and EU data protection legislations.

- The ISAN Registry System, the ISAN database and all data replicates are stored in Switzerland and/or in the European Union.
- ISAN-IA uses third parties' cloud-based solutions for electronic communications and customer service deliverance. All our technical service suppliers comply with EU data protection requirements.
- When you send emails to ISAN-IA, all data is stored in the European Union except data sent to cs@isan.org or directly submitted to <https://support.isan.org/>. Such data can be stored in the European Economic Area or in the United States (US).

PROTECTION OF YOUR DATA

All information you provide to us is stored securely and any access to your online user account is controlled by a password and user name that is unique to you. We take appropriate technical and organizational measures against unauthorized access, accidental loss or destruction of, or damage to your personal data.

Please note that where our web site includes links to, or content embedded from, third party web sites, such web sites are outside our control and are not covered by this Privacy Policy.

COOKIES

The ISAN Registry System uses cookies. Cookies are text files placed on your computer or mobile device. For more information on which cookies we use and how we use them, see our [Cookies Policy](#).

RETENTION OF YOUR DATA

The retention of your data is necessary for the legitimate interests of our audiovisual content identification activity and for the interest of all ISAN users.

We may keep your information as long as necessary to provide our services, including those aspects of such services which continue beyond the term of your agreement with ISAN-IA or your ISAN Registration Agency.

- We will keep your information related to all audiovisual content identified with ISAN for perpetuity.
- We will maintain records of rejected applications for registrant status and for ISAN for perpetuity as required by the [ISAN standard \(Annex C 2.11 Administration of the ISAN System\)](#).

WHAT RIGHTS DO YOU HAVE?

You can request ISAN-IA to give you a copy of your personal data together with explanations on how it is being processed; to correct any mistakes; to erase your personal data; to restrict their processing; or to receive personal information you provided to ISAN-IA in a structured, commonly used and machine-readable format.

You have the right to object to us processing your personal data if our legal basis for processing your personal information is the legitimate interest pursued by ISAN-IA or a third party (such as listed in the Section "How will we use the personal data?" above).

Please note that all ISAN users have direct access to their personal information and works or versions related information they have provided to us via their ISAN account where they can update and correct such data at any time.

HOW TO CONTACT US

If you have any questions about this Privacy Policy or would like to make a request to exercise any of your rights in relation to your personal data, please use the following contact details or contact your ISAN Registration Agency:

ISAN-IA – Cours de Rive, 2 - CH-1204 Geneva - Switzerland - T: +41 22 545 10 00 - F: +41 22 545 10 40 - www.isan.org - cs@isan.org

COMPLAINTS

We take your privacy very seriously and are committed to processing your data in compliance with applicable Swiss and EU data protection legislations. However, if you have any concerns or problems with the way your personal data has been processed, please contact us or raise your concerns with your ISAN Registration Agency. If you are unhappy with how your complaint has been handled, you may lodge a complaint with the following authority:

Federal Data Protection and Information Commissioner FDPIC Feldeggweg 1
CH - 3003 Berne
Tel.: +41 (0)58 462 43 95

CHANGES TO THE PRIVACY POLICY

We may change this privacy policy from time to time. Please check regularly this page for any updates or changes.