

amount of the deduction shall not exceed the proportion of the Canadian tax that the income from Denmark that is subject to Danish tax bears to the total income subject to Canadian tax. For the purposes of this paragraph only, the term "Danish tax" shall not include the communal income tax.

2. Denmark agrees to allow as a deduction from Danish tax on any income derived from sources within Canada that is subject to tax in Denmark the amount of Canadian tax payable in respect to that income, provided that the amount of the deduction shall not exceed the proportion of the Danish tax that the income from Canada that is subject to Canadian tax bears to the total income subject to Danish tax.

3. For the purposes of this Article, profits or remuneration for personal (including professional) services performed in one of the territories shall be deemed to be income from sources within that territory, and the services of an individual whose services are wholly or mainly performed in ships or aircraft operated by a resident of one of the territories shall be deemed to be performed in that territory.

ARTICLE XIV

1. The competent authorities of the Contracting Governments will upon request exchange information of a fiscal nature which is available to them, or which they are able to obtain under their own legislation and which would be useful to assure the regular assessment and collection of the taxes referred to in this Agreement, as well as the application with respect to these taxes of the legal provisions relative to the prevention of fiscal fraud.

The information so exchanged shall retain its secret nature and shall not be disclosed to persons other than those charged with assessment and collection of the taxes referred to in this Agreement.

The provisions of this Article shall not in any case be considered as requiring one of the Contracting Governments to disclose to the other Government, either, information other than that which its own fiscal legislation permits it to obtain, or information the furnishing of which would involve the disclosure of industrial, commercial or professional secrets or trade processes.

Neither shall these provisions be considered as imposing on one of the two Contracting Governments the obligation to perform an administrative act which would be contrary to its regulations or practices.

2. The term "competent authorities" means, in the case of Canada, the Minister of National Revenue or his authorized representative; and in the case of Denmark the Minister of Finance or his authorized representative.

ARTICLE XV

1. The present Agreement may be extended, either in its entirety or with modifications, to the territories of the Faroe Islands and Greenland if in these territories there are imposed taxes substantially similar in character to those which are the subject of the present Agreement. The extension of the Agreement and the modifications thereto shall be specified and agreed between the Contracting Parties in notes to be exchanged for this purpose.

2. The termination of the present Agreement under Article XVIII shall, unless otherwise expressly agreed by both Contracting Parties, terminate the