



# **PRIVACY POLICY**

## **1. To whom does this Privacy Policy apply?**

Kinopolis collects and processes your personal data in order to allow you to enjoy our products and services in the best possible and user-friendly way. We also aim to get to know you better and tailor our products and services as much as possible to your preferences.

Since we consider the protection of your privacy extremely important, you can find in this Privacy Policy the necessary information about what personal data we process, how it is used, what your privacy rights are and how you can exercise them.

This Privacy Policy applies to the processing of personal data in relation to all products and services offered by Kinopolis Group to its private customers in its cinemas, via the websites, via the mobile applications, at customer surveys, via competitions, via promotions or events, via Wi-Fi, or with any other use of our products and services.

## **2. Who is responsible for the 'processing' of personal data?**

The personal data that you share with us, expressly or by automated means, are collected and processed by or on behalf of Kinopolis Group NV, with headquarters at 1020 Brussels (BELGIUM), Eeuwfeestlaan 20, Company number BTW/VAT BE 0415.928.179, RPR Brussels 622 315; correspondence address: 9000 Ghent (BELGIUM), Moutstraat 132-146.

Kinopolis Group shares this data with its subsidiaries (other legal entities, for example individual Kinopolis cinemas or a grouping of a number of Kinopolis cinemas hereinafter jointly referred to as "Kinopolis") in order to be able to offer its services in the most efficient manner.

## **3. What data does Kinopolis process about me? How does Kinopolis obtain these data?**

Within the context of its service provision, Kinopolis collects and processes the following categories of personal data, where the starting point for Kinopolis is always to let you - if possible - decide to what extent you want to strengthen and "personalize" your relationship with Kinopolis. In principle, the following data will not be collected from third parties, but will be requested from you, such as when purchasing a product, participating in a survey or competition, when registering and managing your customer account:

- Identification and contact details, such as name, e-mail address, language preference, gender;
- Payment details;
- Details about the products and services that are ordered;
- Information based on contacts with you in the context of our service provision;
- Film related preferences and cinema preferences;
- Information related to the goods bought in the shops;



- Other preferences (sports, music, culture) and data that you communicate in the context of the MyKinopolis account or another Kinopolis product, such as age, family data, training and professional activities, photos.

In addition, with your permission, we may receive location data from devices that you use or your location can be derived from your IP number. Furthermore, surveillance cameras help us to ensure the best possible security for our customers and employees.

In principle, Kinopolis will not process any sensitive data (special categories of personal data, such as your religious beliefs). If this is exceptionally the case, your explicit consent will always be requested.

Finally, certain data are collected in an automated manner by "cookies" and other systems that collect information, such as your IP address, the type and language of the browser, the time of your visit, your surfing behaviour and the pages you have visited. More information about cookies can be found in our Cookie Policy.

#### **4. Why does Kinopolis process these data?**

Kinopolis collects, records and processes personal data in order to:

- (i) to provide you with the products and services you have purchased or registered for (such as movie tickets and coupons, the My Kinopolis account, loyalty cards, newsletters or participation in a contest) and to be able to handle customer administration (including collections) and litigation in this area;
- (ii) to inform you via e-mail or other channels about products and services, including actions and promotions, that Kinopolis offers or that are offered by Kinopolis business partners;
- (iii) to enable Kinopolis to tailor its communication and products and services to your preferences and/or age and thus provide you with film and cinematographic information (including merchandising, snacks, drinks, etc.) tailored to your wishes, using a profile that Kinopolis has obtained based on your interests;
- (iv) to be able to answer your comments and/or questions about your visit or your purchase of products or services;
- (v) to be able to monitor customer satisfaction;
- (vi) to prevent and detect abuse and fraud and ensure compliance with the General Terms and Conditions of Use and Purchase;
- (vii) to meet our legal obligations, particularly in terms of accounting and taxation and the registration of the exercise of privacy rights mentioned in article 7;
- (viii) for (general) market research, statistical purposes and analysis of the operation and use of the website and mobile applications.

Processing for the purposes mentioned in (i), (iv), (vi) and (vii) above is necessary for the conclusion or performance of our agreement with you.

Processing for the purposes mentioned in (ii), (v), and (viii) above is necessary for our legitimate interests to improve and promote our products and services, as well as to ensure a personalised experience for our customers.



Processing for the purposes mentioned in (iii) are necessary for the My Kinopolis account holders for the conclusion and performance of the My Kinopolis account and for the other customers based on the legitimate interest of Kinopolis to improve and promote our products and services, and to ensure a personalized experience for our customers.

To the extent required by law, certain processing operations will require your consent.

Kinopolis may use your personal data to contact you directly, by post, telephone or electronically, such as for example via e-mail, SMS or social media. In case this communication is sent for commercial purposes, you will always be offered the opportunity to "unsubscribe" at any time.

Kinopolis does not apply automatic decision-making - whether or not based on profiling – which contain legal consequences for you.

## **5. For how long will Kinopolis retain my personal data?**

Kinopolis will retain your personal data only for as long as necessary for the purposes described and in accordance with legal obligations.

For example, information about questions you submit to us is, in principle, only kept for a period of 6 months after the processing of your request. The information we store to personalize our communication to you and to keep you informed of our products and services will be deleted within 3 years after your last active interaction with Kinopolis. In this way we also prevent that irrelevant information is saved. We retain certain data for a period of 10 years, but only to be able to serve as proof in disputes or to respond to a legal request from a government agency.

After the applicable storage period has expired, the data will be erased or anonymised.

## **6. Does Kinopolis supply my personal data to other organisations?**

For the purposes described under Article 3, Kinopolis may engage so-called 'processors'. They work exclusively under our direction and can therefore only process your personal data as instructed by us.

We use e.g. suppliers of marketing, communication, logistical and IT services, in order to personalise and optimise our service, to process credit card transactions and payment collections, to restrict fraud in credit card transactions and other payment methods, to organise competitions, to deliver the purchased products, to help organise our events, to supply customer service, to recover debts, etc. These Suppliers may obtain access to your personal data or other information when supplying such services. We permit these companies to process your personal details only to the extent necessary to deliver their services. We also ensure that these processors provide an adequate level of security concerning data protection.

We may also forward and share your personal data with companies within the Kinopolis group, which will be considered as processors or joint processors.



Furthermore, there may also be interactions with web service providers and social media platforms. For example, our website may also contain performance and social plug-ins. By connecting for example to our products and services via social networks, such as via the social plug-in of Facebook and Instagram, you may also share certain information with these third parties. Performance plug-ins (for example Google Analytics) analyse your surfing behavior to help the Kinepolis Group to improve its website. These types of plug-ins are managed by the social media and the web service providers themselves. We therefore advise you to read the terms of use and privacy policies of these social networks and/or providers, over which Kinepolis has no control.

Kinepolis Group also shares, in certain circumstances, personal data with social media platforms or web service providers for advertising purposes, such as showing advertisements relating to films, whether or not in collaboration with film distributors. These advertisements are shown on social media or via web service providers themselves. In this context, the display of advertising is governed by the terms of use and privacy policy of these social networks and/or web service providers, over which Kinepolis has no control. We therefore advise you to read in addition to our Cookie Policy, also the Terms of Use and Privacy/Cookie Policy of the networks and web service providers in question.

Our own Privacy and Cookie Policy governs only the use of the data we collect and process ourselves. In the cases described above, Kinepolis Group often acts as a joint controller with the social media/web service provider or the partner (such as a film distributor for such advertising) for the provision of the relevant personal data. Please refer to section 8 below regarding your rights in this regard.

When we process your personal data outside the EU, we ensure, through contractual or other measures (such as the standard contractual clauses of the European Commission), that these data benefit from an adequate level of protection comparable to the level of protection applied within the EU.

## **7. What rights can I exercise concerning my personal data?**

### **Right of access, correction, restriction, deletion and transfer**

You have the right to obtain access to your personal data, to correct your personal data if this would be incorrect or incomplete and to ask to delete your personal data. It should be taken into account that we cannot always remove all requested personal data, for example when processing is necessary for the institution, exercise or substantiation of a legal claim.

In addition, you also have the right to request that the processing be "limited" in the following cases:

- you dispute the accuracy of these personal data: in principle you can make the necessary changes via the self-service platform; if there are any remaining inaccuracies, their use will be limited during a period that enables Kinepolis to check the correctness of the data;
- the processing of your personal data is unlawful: instead of deleting your data, you request restriction of its use;
- Kinepolis no longer needs your data for the original processing purposes, but you need them for the institution, exercise or substantiation of a legal claim: instead of deleting your data, its use is limited for the institution, exercise or substantiation of the legal claim;



- as long as no decision has been taken on the exercise of your right to object to the processing, you request to limit the use of your personal data.

If you wish to transfer your personally supplied personal data to another service provider, this is also possible. We call this the so-called "right to data portability".

### **Right to object**

Whenever the processing is based on a legitimate interest of Kinepolis, you have the right to object to this processing.

You thus have for example the right to object, at any time, without charge and without justification, to the planned processing of your data for the purpose of direct marketing, including profiling.

### **Right to withdraw consent**

Where the processing is based on your consent, you always have the right to withdraw this permission, without this affecting the lawfulness of the processing on the basis of the permission before this withdrawal.

For more information about the above mentioned rights, please refer to the FAQs on the Kinepolis website(s).

## **8. How can I exercise these rights in practice?**

Kinepolis strives to give you as much control as possible about the personal data we process about you.

Through the self-service platform that is available to you, you can easily exercise all the rights mentioned above.

If you have a My Kinepolis account, this tool is already available to you in your My Kinepolis account, under the heading 'My Profile'

If you do not have a Kinepolis account, you can exercise your rights via the following link: Exercising my rights | Kinepolis Luxemburg. First, you need to enter your email address in an online form, then an email will be sent to that address with a link to a page where you can exercise your rights. You can also find this procedure to exercise your rights in the FAQ available on the Kinepolis website.

If you have additional questions, you can also send us a request by sending an e-mail to Kinepolis to [privacy\[at\]kinepolis\[dot\]be](mailto:privacy[at]kinepolis[dot]be)



## **9. Can Kinopolis make changes to this Privacy Policy?**

This Privacy Policy may be amended from time to time, among other things to adapt them to a changed service provision or to changes in legal and regulatory requirements.

You will always find the most recent version on the website. Important changes will be reported on our website at your next visit.

## **10. How does Kinopolis deal with the data of children?**

Kinopolis ensures that the privacy of minors and more particularly minus 13 years is protected. In particular, Kinopolis requests minors, if they register a My Kinopolis account, participate in a competition or register for a newsletter, to inform their parents about their online activity and thoroughly read this Privacy Policy together with the Cookie Policy. Minors who have not yet reached the age of 13, will also have to fill in the e-mail address of one of the parents or legal guardian, who will then receive an e-mail about the online activities of the minor, will be invited to read the Privacy Policy and Cookie Policy together with the minor and, if necessary, to have the data of the minor removed.

## **11. Whom can I contact in the event of uncertainties or complaints?**

For questions that do not relate to the exercise of your rights as mentioned under point 7 and any complaints you can always contact our Data Protection Officer (DPO). You can reach our DPO by email at the address [dpo\[at\]kinopolis\[dot\]com](mailto:dpo[at]kinopolis[dot]com).

For complaints or questions, you can also contact the Data Protection Authority: la Commission Nationale pour la Protection des Données 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Tel. +352 2610 60 1, e-mail: [info\[at\]cnpd\[dot\]lu](mailto:info[at]cnpd[dot]lu), Website: <http://www.cnpd.lu/>.