



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 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 MyKinepolis account or another Kinepolis product, such as age, family data, training and professional activities, photos.

In principle, Kinepolis 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, and the web address from which you our website and our mobile applications. More information about cookies can be found in our Cookie Policy.

4. Why does Kinepolis process these data?

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

- (i) supply you with the products and services which you have ordered, and to conduct, in this respect, customer administration and dispute management;
- (ii) inform you via email or other channels about products and services, including offers and promotions, which Kinepolis provides or which are offered by commercial partners of Kinepolis;
- (iii) provide you with tailored information about the products and services of Kinepolis (including merchandising, snacks and drinks) whereby a profile is used which Kinepolis has obtained based on your interests ;
- (iv) measure levels of customer satisfaction;
- (v) to be able to answer your comments and / or questions regarding your cinema visit or your purchase of products or services;
- (vi) to prevent and detect abuse and fraud;
- (vii) to comply with our legal obligations, including with regard to our accounting and tax obligations.
- (viii) for general market research, statistic purposes, and research into the operation and use of the website and mobile applications.

The processing for the purposes mentioned under points (i), (v), (vi) and (vii) are necessary for the realization or execution of our agreement with you.

The processing for the purposes mentioned under points (ii), (iii) and (iv) above are necessary for our legitimate interests to improve and promote our products and services, as well as for a personalized experience to insure our customers. To the extent required by law, certain processing operations for the purposes stated under point (ii) will be based on your consent.

Kinepolis may use your personal data to contact you directly, by post, telephone or electronically, such as via e-mail, SMS or social media. In communication via e-mail 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.

For example, information about the purchases you make or questions you submit to us is, in principle, only kept for a period of 2 months after the purchase / 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 5 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.

We will not transfer your personal data to **other parties** for activities other than those described above and every transfer takes place on the basis of a legal ground for processing. Our partners may only use the data for the intended purposes and only for as long as necessary within the collaboration.

The website may also contain social plug-ins at certain locations. For example, by signing up for our products and services via social media, such as Facebook and Instagram, you will also share certain information, such as your surfing behavior, with these third parties. The plug-ins that refer to those social media are managed by themselves. These social media sometimes also place cookies on your device.



Because these plug-ins are implemented by the social media themselves, they are governed by the terms of use and privacy policy of these social networks over which Kinepolis has no control. We therefore recommend that you read the terms of use and privacy policy of the relevant networks in addition to our Cookie Policy. Our own Privacy and Cookie Policy only regulates the use of the data that we collect and process ourselves.

In principle, your personal data are not processed outside the European Union and we try to ensure as much as possible that our "processors" also respect this principle. If in exceptional cases these nevertheless process your personal data outside the EU, we ensure that via contractual or other measures this data has an appropriate level of protection comparable to the protection in 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.

This way you can always and without motivation oppose the intended processing of your data for direct marketing purposes 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.

If you do not have a My Kinepolis account, you will find the procedure to exercise your rights back in the FAQ that is available on the Kinepolis website(s).

If you have additional questions, you can also send us a request by sending an e-mail to Kinepolis to privacy@kinepolis.be

9. Can Kinepolis 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 Kinepolis deal with the data of children?

Kinepolis ensures that the privacy of minors and more particularly minus 13 years is protected. In particular, Kinepolis requests minors, if they register a My Kinepolis 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@kinopolis.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@cnpd.lu, Website: <http://www.cnpd.lu/>.