



## **PRIVACY POLICY**

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

This Privacy Policy, which covers all the products and services supplied by the Kinopolis Group to its customers and prospects, informs you concerning which personal data we process and how these are used.

However, processing the personal data of business customers is only relevant if the business customer is a natural person, or if it concerns a corporation, in which case the Privacy Policy only applies to the personal data of the natural persons that Kinopolis processes within the context of its relationship with the customer (such as contact persons and mandated individuals).

### **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, and of its subsidiaries, hereafter collectively referred to as 'Kinopolis'.

Kinopolis is the so-called 'data controller' for the personal data which are collected via the website, the mobile applications and other channels.

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

Personal details are details that enable the direct or indirect identification of a natural person.

Within the context of its service provision, Kinopolis collects and processes the following categories of personal data:

- Identification and contact details, such as name, e-mail address, language preference, gender;
- Payment details in the context of operating the contracts that have been agreed with our customers;
- Details about the products and services that are ordered;
- Information based on contacts with you in the context of our service provision.

The details will not in principle be collected from third parties, but will be requested from you, such as upon a request for information, the purchase of a product or service, participation in a survey or competition, the registration and administration of your customer account.

In addition, certain publicly available information may be used in order to contact you.



We also cooperate with companies which can supply us with contact details, whereby we expressly require that there is a legal basis for this.

If you provide us with personal data of persons within your company, you must therefore assure us that you are authorised to do so, taking into account the purposes for which Kinopolis will process the personal data.

Kinopolis uses cookies to:

- improve the use and functionalities of its websites and apps
- analyse how users use our websites and apps and to compile statistics
- display personalised information and advertisements to the users of our websites and apps.

Further information is contained in our Cookie Policy.

#### **4. Why does Kinopolis process these data? On what legal basis?**

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

- supply you with the products (such as gifts) and services (such as events) which you have ordered
- inform you (e.g. via our Kinopolis newsletters) about products and services, including offers and promotions, which Kinopolis provides or which are offered by commercial partners of Kinopolis (the latter only if you have given your permission for this)
- provide you with tailored information about the products and services of Kinopolis, whereby a profile is used which Kinopolis has obtained based on your interests
- monitor our performance and respond to your comments and/or questions concerning our service provision
- measure levels of customer satisfaction.

Kinopolis may use your personal data to contact you direct, by post, telephone or electronically, such as by e-mail or text messages. Regarding communication by e-mail, you will always be offered the possibility of 'unsubscribe' at any time (see also below: about your rights as a data subject).

#### **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. Your personal data will in principle be removed 5 years after your last active interaction with Kinopolis. This also prevents us from retaining outdated information. Because the contractual liability expires only after 10 years, we will archive certain personal details for that period, only for that purpose. In the event that other legal obligations impose further archiving (such as concerning the retention of invoices) we will naturally observe the legislation.



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

For the purposes described under Article 3, Kinepolis 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.

Besides engaging such ‘processors’ for the services described, we only share personal data that you have expressly given us, such as your name, e-mail address and other non-automated details, with **other parties** provided that we have obtained your express permission, unless we are obliged to do so for legal reasons, a request from a government body or a court order.

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

## **7. Are personal data forwarded to countries which do not guarantee similar data protection?**

Kinepolis collects your details in its databases and endeavours to protect those details in line with market conditions against any change, loss or illicit use.

To the extent that personal data are processed outside of the European Union, we ensure via contractual and other measures that those details are given a level of security comparable with the protection they would have in the European Union, in line with European legislation.

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

Once your data have been collected and processed, you have the right to **inspect** these personal data, to request **corrections** if they are incorrect and, with reason, to request that the personal data be **removed**. Bear in mind, however, that we are not always able to remove all the requested personal data, for example if their processing is necessary for the institution, performance or support of a legal claim.

In addition, you have the right to request that the processing be ‘**limited**’ (in cases where immediate removal would be to your disadvantage, the personal data are only rendered inaccessible).

If you wish to transfer your active personal data to another service provider, this is also possible. We term this the ‘right of **data portability**’.



Whenever the processing is based on a justified interest of Kinopolis, you have the right **to object** to this. Kinopolis will suspend the processing of your personal data, unless the processing of the personal data relates to the institution, performance or support of a legal claim (for example, the submission of a request to a court).

Where the processing is based on your **permission**, you retain the right to withdraw the permission, without this affecting the legality of the processing based on the permission prior to its withdrawal.

You have the right at all times to object, without having to state a reason, to the use of your personal data for **direct marketing purposes**.

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

You can exercise these rights by sending an e-mail to [dpo@kinopolis.com](mailto:dpo@kinopolis.com).

To prove your identity, you should attach a copy of the front of your identity card. We do this to secure your personal data, among other things to ensure that third parties do not obtain insight into your personal data.

## **10. 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. We therefore recommend that you regularly consult the latest version of this Privacy Policy on our website.

You can ask for general questions or remarks regarding your personal data that do not relate to the exercise of your rights as mentioned above under points 8 and 9.

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

For general questions or comments concerning your personal data, please contact us by sending an e-mail to [dpo@kinopolis.com](mailto:dpo@kinopolis.com)

For complaints in connection with the processing of your personal data by Kinopolis, you can also contact the Belgian Data Protection Authority: Rue de la Presse 35, 1000 Bruxelles, tél. +32 (0)2 274 48 00, e-mail : [contact@apd-gba.be](mailto:contact@apd-gba.be), website : [www.autoriteprotectiondonnees.be](http://www.autoriteprotectiondonnees.be)