PRIVACY POLICY

1. Introduction

Kinepolis collects and processes your personal data in order to provide you with a user-friendly and optimal film and cinematographic experience.
We also want to know you better and adapt our products and services to your preferences as much as possible.

Since the protection of your privacy is of paramount importance to us, this Privacy Policy provides you with the necessary information about the type of personal data we process, how we use it, your rights in this regard and how you can exercise them.

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

2. Who is responsible for the “processing of my personal data?

The personal data that you share with us, directly or automatically, is collected and processed by or on behalf of Kinepolis Group S.A., whose registered office is located at Boulevard du Centenaire 20, 1020 Brussels (BELGIUM), registered under company number VAT BE 0415.928.179, RPM Brussels 622 315, and whose mailing address is Moutstraat 132-146, 9000 Gent (BELGIUM).

Kinepolis Group shares this data with its subsidiaries (other legal entities, such as individual Kinepolis cinemas or a group of several Kinepolis cinemas, hereinafter jointly referred to as "Kinepolis") in order to offer you the best possible service.

3. Services

Kinepolis aims to offer film and culture lovers a unique film and cinematographic experience by offering them films, alternative content and tailor-made events and by allowing them to enjoy unique relaxation opportunities that offer optimal user comfort.

Kinepolis is trying to achieve this “Ultimate Movie Experience” ambition by programming films and other content according to its customers' preferences and providing recommendations based on their personal preferences and to achieve its “Ultimate Cinema Experience” ambition by simplifying the ticket purchasing system, in particular through the offer of mobile ticketing applications, by selling gift boxes via the e-shop, etc.

These services also include informing customers about the above ambitions through websites (whether or not of third parties), the My Kinepolis account, newsletters, emails, social networks, messaging services (such as, but not limited to, Whatsapp) and other electronic channels.

However, to use certain services, it will be necessary to create a My Kinepolis account and provide the requested data.

4. What data does Kinepolis process about me? How does Kinepolis obtain this data?

As part of the services (such as selling tickets online or providing a My Kinepolis account), Kinepolis collects and processes the following categories of personal data, always assuming that you decide – if possible - to what extent you wish to strengthen and “personalise” your relationship with Kinepolis. The following data will therefore in principle not be collected from third parties, but will be requested directly from you, for example in connection with the purchase of a product, participation in a survey or contest or the registration and management of your customer account:

- Identification data and contact details, such as your name, e-mail address, language preference, sex;
- Payment data;
- Film and cinematographic preferences;
- Information on the products purchased in our stores;
- Other preferences (sport, music, culture) and data you provide as part of the My Kinepolis account or another Kinepolis product, such as your age, family data, data about your education and professional activities, your photo;
- Information following contacts with you as part of our services.

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.

If you create a My Kinepolis account using an account from a third party (such as Meta or Google), information from that account is used for the profile on our website. This information relates only to data that is publicly shared with the third party site and may include the following: your name, email address, date of birth, sex, use of the third party site, other public data. If you do not want this information to be shared, we recommend that you change your settings on the relevant social network site.

Kinepolis will in principle refrain from processing sensitive data (special categories of personal data such as your religious beliefs). However, if this were the case in exceptional circumstances, your explicit consent will each time be requested for this purpose.

Finally, some data is collected automatically by "cookies" and other systems that collect information. This includes, for example, your IP address, browser type and language, length of your visit, browsing behaviour and pages you have visited. You can find more information about cookies in our Cookie Policy.

5. Why does Kinepolis process this data?

Kinepolis collects, stores and processes personal data:

(i) to provide you with the products and services you have purchased or registered for (such as movie tickets and coupons, the My Kinepolis 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 Kinepolis offers or that are offered by Kinepolis business partners;
(iii) to enable Kinepolis 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 Kinepolis 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 help guarantee the safety of our customers and employees (via video surveillance);
(vii) to prevent and detect abuse and fraud (such as checking the email addresses) and ensure compliance with the General Terms and Conditions of Use and Purchase;
(viii) to meet our legal obligations, particularly in terms of accounting and taxation and the registration of the exercise of privacy rights mentioned in article 8;
(ix) for (general) market research, statistical purposes and analysis of the operation and use of the website and mobile applications and other digital platforms, including analyses relating to the use of digital content such as videos and other media on our online channels.

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

Processing for the purposes mentioned in (ii), (v), (vi), (vii), (vii) and (ix) above is necessary for ourlegitimate interests to improve and promote our products and services, as well as to ensure a personalised experience for our customers. If you wish to obtain more detailed information regarding the assessment we carry out in this regard, it is available upon request.

Processing for the purposes mentioned in (iii) are necessary for the My Kinepolis account holders for the conclusion and performance of the My Kinepolis account and for the other customers based on the legitimate interest of Kinepolis to improve and promote our products and services, and to ensure a personalized experience for our customers. If you wish to obtain more detailed information regarding the assessment we carry out in this regard, it is available upon request.

Where profiling is carried out, Kinepolis clarifies that this is limited to the sending of personalised e-mails, the content of which is based on your previous purchases and the data you have provided to Kinepolis.

To the extent required by law, certain processing operations will require your consent. This may also take place through the use of cookies.

Finally, there are also processing activities that are necessary for compliance with a legal obligation. This may include, among others, the processing activities listed in point (viii) or the fulfilment of requests from judicial authorities and police services to disclose personal data.

Kinepolis may use your personal data to contact you directly, by post, by telephone or electronically, for example by e-mail, messaging services (such as Whatsapp, SMS,…) or social networks. In case this communication is send for commercial purposes, you will always have the possibility to "unsubscribe" at any time.

With the exception of fraud detection, Kinepolis does not apply automated decision making - whether or not based on profiling -that produces legal effects concerning you.

6. How long does Kinepolis keep my personal data?

Kinepolis keeps your personal data only for as long as necessary for the purposes described and in accordance with legal obligations.

Transaction and billing data are retained for a period of 2 months from the date of the transaction.

The questions you ask us are retained for a period of 6 months following the handling of your question.

For persons without a MyKinepolis account, we keep the data that we use to personalise our communication and keep you informed about our products and services for a maximum period of 3 years after your last active interaction with Kinepolis.

In addition, an absolute maximum retention period applies to the personal data concerned:

- for persons without a MyKinepolis account, we never keep the personal data for longer than 15 years;
- for persons with a MyKinepolis account, we never keep the personal data for longer than 20 years.

We keep some data for a period of 10 years, but only for the purpose of using it as evidence in the event of disputes. The same retention period applies to the retention of requests relating to your personal data.

Personal data that we process via WhatsApp for the purpose of sending you marketing communications about films, and for which you have given your consent, are retained for a maximum period of 3 years following your last active interaction with Kinepolis via WhatsApp.
For personal data processed via WhatsApp in relation to specific films, the applicable retention period for the relevant purpose applies.

At the end of the applicable retention period, the personal data are deleted or irreversibly anonymised.

7. Does Kinepolis transfer my personal data to other organisations?

For the purposes described in Article 3, Kinepolis may engage carefully selected service providers, so-called "processors", to assist it in the provision, management, and optimisation of its products and services.

For example, we may use (i) payment and transaction processors, (ii) marketing, advertising, and media platforms, (iii) social media and content-sharing platforms, (iv) marketing automation, CRM, and customer engagement platforms, (v) analytics, tracking, and reporting tools, (vi) digital marketing and web agencies, (vii) e-commerce, ticketing, and fulfilment partners, (viii) communication and messaging service providers, (ix) customer service and support platforms, (x) event and activation partners, (xi) IT, cloud, and hosting service providers, (xii) security service providers, and (xiii) loyalty and platform partners.

These service providers assist us, among other things, with processing payments and refunds, preventing fraud, managing our websites, apps, and IT infrastructure, personalising and optimising our services, sending communications and advertisements and carrying out campaigns, organising competitions, events, and promotional activities, analysing the use of our services, managing customer relationships, providing customer support, and processing orders, reservations, and ticket sales.

It is possible that these service providers may, in the course of providing such services, gain access to your personal data or other information. They process such personal data solely on our instructions and will therefore only be permitted to process your personal data in accordance with our instructions and within the framework of this Privacy Policy. We enter into the necessary data processing agreements with our processors and ensure that they implement appropriate technical and organisational measures to protect your personal data and to guarantee an adequate level of security in accordance with applicable data protection legislation.

In addition, we may transfer your personal data to and share them with companies in the Kinepolis group, the latter being considered as a processor or joint controller, as the case may be.

Your data may also be shared with certain public authorities on the basis of a legal obligation. This includes, among others, judicial authorities, police services, intelligence and security services, the Data Protection Authority, and the tax authorities.

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 Meta 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 advice 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.

The third parties mentioned above are established in Belgium, within the European Union, and in countries outside the European Union, such as the United States, the United Kingdom, and New Zealand.

When we process your personal data outside the EU and no adequacy decision of the European Commission exists for that country, we ensure, through contractual or other measures (such as the standard contractual clauses of the European Commission or the EU-US Data Privacy Framework), that these data benefit from an adequate level of protection comparable to the level of protection applied within the EU.

Kinepolis may jointly organise and offer events with other organisations (hereinafter referred to as the "co-organisers"). In the context of such events, Kinepolis may transfer personal data to the co-organiser for the organisation, execution and follow-up of the event concerned. The legal basis for such transfer is the legitimate interest of the co-organiser. When you register for an event jointly organised by Kinepolis and a co-organiser, and a transfer of personal data is envisaged, you will be informed of this at the time of registration.

Any other further transfer of personal data, including to third parties acting as independent controllers under the applicable data protection legislation, where the purposes and means of processing are determined by those third parties, shall only take place on the basis of your explicit and informed consent.

8. What rights can I exercise with regard to my personal data?

Right of access, rectification, limitation of processing, erasure and portability of data

You have the right to obtain access to your personal data, to request its **rectification** if it is inaccurate or incomplete and to request its **erasure**. However, it should be taken into account that we cannot always delete all the personal data requested, for example when the processing of such data is necessary for the establishment, exercise or defence of legal claims.

In addition, you have the right to have **the processing limited** in the following cases:

- you dispute the accuracy of this personal data: in principle, you can make the required changes via the self-service platform; if inaccurate data remain, their use will be limited for a period of time allowing Kinepolis to verify the accuracy of the personal data;
- the processing of your data is unlawfully implemented and you oppose their erasure and instead require the limitation of their use;
- Kinepolis no longer needs your data for initial processing, but you still need it for the establishment, exercise or defence of legal claims: instead of erasing your data, its use is limited to the establishment, exercise or defence of legal claims;
- as long as no decision is taken on the exercise of your right to object to the processing, you request that the use of your personal data be limited.

It is also possible for you to transmit the personal data you have actively provided to another service provider. This is what is called the "**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 it.

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

If the processing is based on your consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal of the consent.

For more information about the above rights we refer to our FAQ's on the Kinepolis website(s). ".

9. How can I exercise these rights in practice?

As part of an honest and lasting relationship of trust with you as a customer, Kinepolis strives, as far as possible, to give you control over the personal data that we process concerning you.

You can simply exercise all the above-mentioned rights via the self-service platform at your disposal.

If you have a My Kinepolis account, this tool is already available in your My Kinepolis account.

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 use our Kinepolis WhatsApp channel to receive electronic marketing communications, the method described above does not apply. In this specific case, if you wish to exercise your data protection rights in relation to the personal data we process via this channel, you may send a message containing the text "#privacy" in this WhatsApp channel. Kinepolis will subsequently contact you via this channel so that you can formulate your request in more detail. Once Kinepolis has received your specific request, it will process it in accordance with the applicable data protection legislation and inform you, no later than one month after receiving your request, of the measures taken in response to your request.

For any further information, you can also send us a request by sending an e-mail to privacy[at]kinepolis[dot]lu.

10. What is Kinepolis' position on children's data?

Kinepolis ensures that the privacy of minors, and in particular children under 13 years of age, is protected and therefore asks minors who wish to open a My Kinepolis account, participate in a contest or register for a newsletter, to inform their parents about their online activity and to read together carefully this Privacy Protection Policy and the Cookies Policy.

Minors under 13 years of age, in these cases, must also complete the email address of one of the parents or legal guardians who will then receive explanations about the minor's online activities. Parents will also be asked to read the Privacy Protection Policy and the Cookies Policy together with minors and will be given the opportunity to erase the minor's data.

11. Can Kinepolis make changes to this Privacy Protection Policy?

This Privacy Policy may be amended from time to time, including to adapt it to changes in a service or to legal and regulatory requirements. You will always find the most recent version on the website. Important changes will be indicated the next time you visit our website.

12. Who can I contact if I have any questions or complaints?

If you have any questions that do not concern the exercise of your rights as mentioned in point 8 and any complaints, you can always contact our Data Protection Officer (DPO). You can reach our DPO by e-mail at dpo[at]kinepolis[dot]com

For complaints regarding the processing of your personal data by Kinepolis, you may also contact the National Commission for Data Protection 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Tel. +352 2610 60 1, e-mail: info[at]cnpd[dot]lu, Website: http://www.cnpd.lu/.