



PRIVACY POLICY

1. Who does this Privacy Policy apply to?

This Privacy Policy applies to all the products and services that Kinopolis Group offers to its customers and potential business clients. This Privacy Policy provides information on what personal data we process, how we use it, what your privacy rights are and how you can exercise these rights.

However, processing the personal data of business clients is only appropriate if the business client is an individual. If the business client is a legal entity, the Privacy Policy only applies to the personal data of individuals that Kinopolis processes as part of its relationship with the business client (such as contact persons and representatives).

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

The personal data that you provide, either expressly or by automated means, is collected and processed on behalf of the public company (plc) (“*naamloze vennootschap*”) Kinopolis Group, with registered office in B-1020 Brussels (BELGIUM), boulevard du Centenaire 20, VAT number BE 0415928179, Register of Legal Entities (RPR) Brussels 622 315, with address for service at B-9000 Gante (BELGIUM), Moutstraat 132-146, and its subsidiaries, referred to hereinafter as “Kinopolis”.

The Kinopolis Group shares this data with its subsidiaries (other legal entities such as individual Kinopolis cinemas or groups of several Kinopolis cinemas, referred to hereinafter as “Kinopolis”) to ensure its services are provided in the best possible way

Kinopolis is the “data controller” of the personal data collected via the website, mobile applications and other channels.

3. What data of mine does Kinopolis process? How does Kinopolis obtain this data?

Personal data is information that can be used to identify an individual, either directly or indirectly. Although the processing takes place as part of a business-to-business relationship, this does not of course mean that you as a contact person or visitor to the website would lose any of your rights as an individual.



As part of its service, Kinopolis collects and processes the following categories of personal data:

- Identification and contact details, such as name, email address, language preference and gender.
- Payment data as part of any contracts entered into with our customers.
- Information about the products and services ordered.
- Information about the result of any contacts you make as part of the provision of our services.
- Photo and video recordings of events in which attendants can be identified.

In principle, data will not be collected from any third parties, but are requested from you, e.g. as the result of an information query, the purchase of a product or service, taking part in a survey or competition, or registering and handling your customer account.

Certain publicly available information may also be used to communicate with you.

We also collaborate with businesses that may provide us with contact details, which we take steps to ensure are legitimate, taking the purpose for which Kinopolis will process said personal data into account.

Finally, certain data is collected automatically through the use of “cookies” and other information-gathering systems, such as the IP address, your browser type and language, the length of time that you spend on the website, your browsing behaviour and the website’s pages that you visit. You can find more information about cookies in our cookies policy.

4. Why does Kinopolis process this data?

Kinopolis collects, records and processes personal data:

(i) to provide you with products (such as gifts) and services (such as events) that you have **requested**, and subsequently, based on our legitimate interests, to keep you informed about our products and services. We may also provide you with customised information, for which a profile that Kinopolis has received based on your interests is used, and to inform you about the products and services offered by the commercial partners of Kinopolis (this latter only if authorisation has been given and received).

(ii) to monitor the services provided, respond to your comments and/or queries about our service provision, update our customer and process management systems, and in general to meet our legal obligations relating to financial and accounting matters, among others.



(iii) to inform you, as a potential interested customer (and through our Kinopolis Business newsletters) about our products and services, including promotional activities and promotions offered by Kinopolis or its commercial partners (when consent has been obtained).

(iv) to provide you, as a potential interested customer, with customised information about Kinopolis products and services, using a profile obtained by Kinopolis based on your interests.

(v) to conduct customer satisfaction research.

(vi) for market studies (of a general nature), for statistical purposes and to study how the website and mobile applications operate and are used.

(vii) to put you in contact with providers offering additional services, such as catering or audiovisual material for an event.

(viii) to manage and monitor any requests you make to exercise your privacy rights and any other privacy-related queries.

(ix) to manage VIP passes.

(x) the photographs and video recordings of events are used as reminders for attendants, to provide a sense of the occasion to those who were unable to attend, and to promote the various activities organised by Kinopolis.

The processing of data for the purposes described in paragraphs (i) and (ii) is necessary to implement or uphold our agreement with you.

The processing of data for the purposes described in points (i), (iii), (iv), (v), (vi), (vii), (ix) and (x) is necessary for our legitimate interests, with the aim of improving and promoting our products and services, and to ensure a personalised experience for our customers.

Processing data for the purpose indicated in point (viii) above is necessary for Kinopolis to meet its necessary legal obligations.

When required by law, as in the case of points (iii), (iv) y (x), certain processing will be carried out based on your consent.

Kinopolis may use your personal data to contact you directly by post, telephone or electronically, such as by email, text or social media. If this communication is for promotional purposes, you will be offered the opportunity to “cancel subscription” at any time.



5. How long will Kinopolis keep my personal data for?

Kinopolis only stores your personal data for the length of time necessary for the purposes described. In principle, your personal data is deleted five years after your last interaction with Kinopolis. In this way we prevent irrelevant information from being stored. Given that any complaints regarding contractual liability only expire after ten years, we will also store some personal information for that length of time, and only for this purpose. If any other legal obligations require information to be held beyond this point (such as information related to invoices being stored), we will obviously comply with this legislation.

6. Does Kinopolis share my personal data with any other organisations?

For the purposes described in article 4, Kinopolis may involve what are known as “**data processors**”. These processors operate solely by our remit and may only process your personal data under instruction and within the framework of this Privacy Policy.

For example, we engage businesses to provide services relating to marketing, communication, logistics and information technology, in order to personalise and optimise our service, process credit card transactions and collections, limit the possibility of fraud in credit card transactions and other forms of payment, organise competitions, deliver products purchased, organise events, provide the customer with the service, recover debts, and so on. As a result, it is possible that these providers have access to your personal data or other information. We only authorise these businesses to process your personal data in the extent to which it is necessary for them to provide their services. We also ensure that these processors guarantee an appropriate level of data protection security.

As well as involving these “data processors” for the services described, we share personal data that you expressly provide us, such as your name, email address and other non-automated data, and only with **other parties** if to that end we have obtained your explicit consent, unless we are compelled to do so by law, by request of a public authority or as a result of a court order.

We may also provide your personal data and share it with companies within the **Kinopolis Group**, which depending on each specific case will be considered data processors or joint data controllers for that particular process.

7. Is personal data transferred to countries that do not guarantee a similar level of personal data protection?

Kinopolis stores your information in its databases and seeks to ensure that this data is protected according to market standards to prevent any modification, loss or misuse.



When your personal data is processed outside of the EU, we take contractual or other measures (such as the standard contractual clauses of the European Commission) to ensure that this data has a suitable level of protection comparable to that of the EU.

8. What rights can I exercise in relation to my personal data?

Once your data has been collected and processed, you have the right to **access** this information, request its **rectification** if it is inaccurate, and request the **cancellation** of said personal data. It is important to understand that we are not always able to remove all personal data when requested, if processing said data is necessary to lodge, exercise or formulate a legal complaint.

You also have the right to request the “**limitation**” of any processing (in cases in which immediate removal could be harmful to you, in which cases said information would only be made inaccessible).

If you wish to transfer your active personal data to another service provider, this is also possible. This is known as the “right to **data portability**”.

When the processing is based on a legitimate interest for Kinopolis, you have the right to **object** to your data being processed. If your objection is valid, Kinopolis will cease to process your personal data, except when, for example, the processing of personal data is linked to lodging or formulating a legal complaint (e.g. filing a court application).

When the processing is based on your **authorisation**, you always have the right to withdraw this authorisation, without said withdrawal affecting the lawfulness of the processing carried out based on the authorisation given prior to said withdrawal.

Finally, you always have the right, without the need to provide a reason, to oppose the use of your personal data for **direct marketing purposes**.

9. How can I exercise these rights in specific terms?

You can exercise these rights by emailing privacidadB2B@kinopolis.es.

Kinopolis has the right to request additional information to confirm your identity. We do this to protect your personal information to ensure, among other reasons, that no third parties have access to your personal data.



10. Can Kinepolis make changes to this Privacy Policy?

From time to time, this Privacy Policy may be subject to modification, e.g. to adapt it to changes in the service or changes to legal requirements and regulations. The most current version is available on the website.

11. 11. Who can I contact regarding any queries or to make a complaint?

For general queries or comments relating to your personal data unrelated to exercising your rights as mentioned above under points 8 and 9, you can contact us by emailing dpo@kinepolis.com

If you have any doubts or complaints, you can also write at any time to the Data Protection Authority, C/Jorge Juan, 6, 28001 Madrid, Tel. +34 91399 6200, email: internacional@agpd.es, website: <https://www.agpd.es>.