

# PRIVACY POLICY (PATHE.BE)

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The Pathé cinemas in Belgium (hereinafter referred to as “We” or ‘Pathé’) wish to give you, as a Customer or User, an overview of the processing of your personal data (your “Data”) and of your rights under the regulations applicable in this respect.

This policy (hereinafter the “Policy”) applies to all services offered by Pathé on pathe.be (hereinafter the “Website”), in particular when you create your Pathé account, book a movie session or subscribe to our newsletter or on the Pathé application (hereinafter the “Mobile App”).

We reserve the right to modify this Policy at any time. We therefore invite you to consult it regularly to ensure that you agree with any changes.

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IN A NUTSHELL

<p><b><u>Data collected</u></b></p> <p>When you subscribe to one of our services (creating an online account, purchasing or renting films, booking movie sessions, subscribing to the newsletter), we ask for certain Data.</p> <p>In addition to this Data directly collected from you, other Data may be automatically collected or generated by our computer systems (for example: IP address).</p>	<p><b><u>What we do with your Data</u></b></p> <p>The collection of your Data allows us to provide you with the subscribed services but also to get to know you better in order to offer you personalized offers.</p>
<p><b><u>Recipients of the Data</u></b></p> <p>Depending on the nature of your request, your data is received and processed by different internal Pathé services and by contractors we appoint.</p>	<p><b><u>Location of your Data and transfer</u></b></p> <p>We mainly store your Data within the European Union.</p> <p>Some of your Data may be transferred outside the European Union, notably to the United States for hosting purposes by our contractors. These data transfers are governed by appropriate safeguards.</p>
<p><b><u>Setting your options</u></b></p> <p>You can manage the settings of your Cookie consents and other trackers on our Websites or Mobile Apps at any time.</p> <p>If you have an online Pathé account, you can manage the settings for receiving film news and our best offers on our Websites and Mobile Apps at any time.</p> <p>If you no longer wish to receive film news and our best offers, you can also use the unsubscribe link present in each email sent to you.</p>	<p><b><u>Contact us</u></b></p> <p>For any questions regarding the Policy, you can contact us:</p> <ul style="list-style-type: none"> <li>- at the following email address: <a href="mailto:dpo.fr@pathe.be">dpo.fr@pathe.be</a></li> <li>- or by mail at the following address: DPO – EMPIRE, Grand-Rue 141-143, 6000 Charleroi.</li> </ul>

## 1. Who we are

Pathé is a French company, a leader in the European film industry, whose activities include film production and distribution as well as cinema operation. Pathé's activities cover the production, distribution, and operation of films in France and abroad.

In Belgium, Pathé operates several multiplex cinemas in different cities through the Belgian company Pathé Belgique S.A., Grand'Rue 141-143, 6000 Charleroi.

These include:

- Pathé Charleroi,
- Pathé Verviers,
- Pathé Louvain-la-Neuve,

- Pathé Genk,
- Pathé Sint-Niklaas,
- Pathé Maasmechelen,
- Pathé Acinapolis.

Pathé Belgique S.A. is the publisher and administrator of the Website <http://www.pathe.be/>.

The Pathé Belgique Mobile App is published and managed by Pathé Cinéma Services, whose headquarters are in France.

## 2. Who is responsible for processing your Data?

For the management of cinemas, booking and purchasing tickets as well as prepaid cards, customer relationship management, purchasing drinks and confectionery, sending and informing personalized offers, security and protection of people and property within the framework of video surveillance, the data controller is Pathé Belgique S.A., a registered Belgian company (with its headquarters at Grand'Rue 141-143, 6000 Charleroi) and its subsidiaries, the following companies:

- Pathé Charleroi,
- Pathé Verviers,
- Pathé Louvain-la-Neuve,
- Pathé Genk,
- Pathé Sint-Niklaas,
- Pathé Maasmechelen,
- Pathé Acinapolis.

Pathé Belgique S.A. belongs to Pathé Cinémas.

For the management of the Website [www.pathe.be](http://www.pathe.be) (hereinafter: the "Site"), and its Mobile App, the data controller is Pathé Cinémas Services, registered under number 392 706 412 at the Paris Trade and Companies Register, with its headquarters located at 1 rue Meyerbeer 75009 Paris, France.

## 3. What types of Data do we collect ?

We offer various services to help you make the most of your cinema experience, for which we collect different types of information about you. We may collect the following Data:

- **When you create your Pathé account by filling out the form on the Website or the Mobile App:** your title, name and surname, email address, notification preferences for receiving commercial offers, date of birth, postal code. In your personal space, you can also provide the following personal Data, optionally: landline phone, mobile phone, postal address, city, country.
- **When you use your Pathé account on the Websites or Mobile Apps:** your favorite movies or the movies you want to see, and your profile picture if you add it (optional).
- **Automatically when you access the Website or the Mobile App:** your IP address, technical information about your browser and device, and browsing Data.

- **When you make a reservation or purchase online or in cinema:** the movie, the chosen session, the concerned cinema, your payment method (credit or debit card, gift voucher, Pathé Star, or other payment methods such as Google Pay or any other payment method), your card fingerprint (to manage payment and possible refund, and if applicable, if you request it to facilitate your future purchases), transactional information, if applicable your name and surname, the email address to which your online reservation is sent.
- **If you give your explicit consent for this purpose:** your location to determine the nearest cinema to you, this Data is not subsequently retained by Pathé.
- **When you join our Pathé Star loyalty program:** your name and surname, your email address, your password.
- **When you buy a 5-ticket card:** your name, surname, and email address.
- **When you subscribe to the newsletter offered on this Website or in the Mobile App:** we collect your email address.
- **When you want to privatize a room for a birthday, school screening, or other:** name, surname, email, your cinema, and the message written (all these Data are collected via the contact form on the Website).
- **When you contact our customer service or one of our cinemas:** your name, surname, email address (if applicable, from your customer account if you log in), content of the request, phone number, and information about your request (movie, concerned cinema, concerned session...) and all attachments related to your request. We keep the history of our exchanges to process your request.
- **When you participate in contests or events:** your name and surname, email address, phone number, postal address (variable information depending on the contests or events).
- **When you go to some of our cinemas that use video surveillance systems,** we may collect images of you. Pathé collects this Data and generally uses the video surveillance system to:
  - ensure the safety of people and property in cinemas, especially in 4dx rooms.
  - resolve incidents and take disciplinary or judicial measures in case of misconduct.
 Video images are kept for 1 month (see below) or in case of procedure, for the duration of the procedure. In this case, the images are only accessible to authorized persons within the framework of the procedure.
- **When you connect to public wifi in our cinemas:** your IP address delivered/assigned by Pathé, your MAC address (address of the phone/tablet, which can be obfuscated by the phone or tablet), and the name of the device/person (e.g., "Iphone XXXX Pro").

## 4. Why do we process your Data / for what purposes do we process your Data ?

We retain and process your Data for several reasons:

- managing your Pathé account (account creation, recording and processing your online orders, accessing your order history, recording and processing your information requests or online complaints with our customer service...)
- improving the Websites and Mobile Apps and your navigation
- purchasing or booking cinema tickets
- customer loyalty through subscription to Pathé Star
- promoting Pathé cinemas via geolocation

- promoting our services through gift vouchers and/or prepaid cards
- sending personalized information and offers (suggesting movies you might like on your Pathé account)
- privatizing cinema rooms for groups
- managing customer service requests
- enriching the customer/prospect database through contests
- ensuring the safety and protection of people and property in cinemas within the framework of entry ban procedures and video surveillance
- providing wifi in our cinemas

## 5. Are you required to provide us with your Data ?

There is no legal obligation requiring you to provide us with information about yourself.

However, we are unable to respond to any requests or fulfill obligations if you do not provide or correctly provide the information designated as mandatory in the relevant form.

Furthermore, you are free to provide the Data designated as optional. The collection of such Data allows us to improve the Website and your browsing experience on the Website.

## 6. How do we collect your consent ?

When the applicable regulations require it, we only collect, process, and use your Data after obtaining clear, explicit, and unequivocal consent from you.

We collect your consent in the following situations:

- when accepting cookies and web navigation trackers (see 8. Cookies and similar technologies);
- when purchasing or booking a cinema ticket, gift card, room reservation, if you wish to save your credit card information;
- when you subscribe to Pathé Star loyalty programs;
- when you use geolocation to find the nearest cinemas to you;
- in certain cases when we offer you personalized services or promotional operations;
- when you wish to use wifi in our cinemas.

## 7. What is the Data retention period for your Data ?

Your Data is retained for the duration of the contractual relationship or subscription to a service, then for a necessary period to manage the end of the contract or service and preserve our interests in case of dispute or legal action. We ensure that the retention period is reasonable in relation to the purpose of this retention.

Below, we present the different retention periods for your Data by the service offered.

Purpose	Legal basis	Retention period before deletion or anonymization
Use of the Pathé online account	Contract	For the duration of use, then 3 years from the last activity
Securing Websites and Mobile Apps	Legitimate interest	6 months
Web tracking analysis (cf. section 8)	Consent	13 months
Purchase of tickets or prepaid cards online	Contract	5 years from the last purchase (Retention of Credit Card Data: 13 months)
Privatization of a cinema room	Contract	5 years from the last purchase
Management of customer service requests	Contract or Legitimate interest following the request	Duration necessary to resolve the request and 5 years after the date of the request in case of claims
Organization of promotional operations such as contests, particularly through social networks	Contract	6 months after the end of the promotional operation 5 years after the end of the operation in case of claims
Remote payment by credit card	Contract	13 months following the debit date or 15 months in the case of deferred debit cards. The CVC security code is deleted at the end of the transaction
Saving the credit card (one-click purchase) excluding CVC security code	Consent	Until the withdrawal of consent by deleting the credit card linked to your Pathé account and/or upon the expiration of the validity of the credit card
Management of your Pathé Star membership	Consent	Until the withdrawal of consent or 3 years from the client's inactivity
Geolocation of Pathé cinemas around you	Consent	N/A: no sending of GPS coordinates to Pathé, no collection of GPS coordinates via the server
Sending personalized information and offers	Consent or legitimate interest following the request	Until the withdrawal of consent or up to 3 years from the last contact
Securing and Protecting Cinemas (Video Surveillance)	Legitimate interest	1 month or, in case of legal proceedings, for the duration of the proceedings
Conducting Statistical Studies	Legitimate interest	Duration necessary to conduct the statistical study or until the exercise of the right to object

Combating Fraud and Preventing Payment Incidents	Legitimate interest	5 years from the last purchase
Exercise or Defense of a Right in Court	Legitimate interest	5 years after the date of knowledge of the disputed facts
Provision of Wi-Fi in Our Cinemas	Consent	6 months after the collection of the mobile number

## 8. Cookies and similar technologies

When you visit our websites or Mobile Apps, cookies and other trackers may be placed and read in the browser of your computer or device. These cookies and other similar technologies allow us to collect Data in order to:

- enable navigation on our Website or Mobile App;
- track your navigation and measure the audience;
- personalize your navigation;
- offer you advertising that matches your interests.

The maximum retention period for cookies is 13 (thirteen) months from their placement on your browser or device. After this period, new consent will be required. You can withdraw your consent at any time.

Cookie type	Partner	Retention period	Consequence of blocking
Consent management	Didomi	12 months	Loss of consent which will need to be renewed at each connection
Authentication	Okta Auth0	12 months	Blocking for the creation and connection to the Pathé account or contacting customer service
Securing	Akamai	2 hours	Blocking for the creation and connection to the Pathé account or contacting customer service
	Google reCAPTCHA	6 months	
Performance measurement	Akamai mPulse	2 hours	No consequences
	Crazy Egg	13 months	
Audience analysis	Google Analytics	13 months	No consequences
Personalised advertisement	Google Advertising Products	3 months	No consequences
	Facebook Ads	3 months	

	Instagram Snap (Snapchat) TikTok Xandr Pinterest Outbrain LinkedIn	12 months 13 months 3 months 12 months 12 months 12 months 12 months	
Mobile phone personalised advertisement	Airship	13 months	No consequences

Cookies are placed either by us or by third parties based on the choices you made when setting your Cookie consents during your first visit to the Websites or your first use of our Mobile Apps.

As a reminder, you can adjust your Cookie consents at any time by clicking on the link available at the bottom of our Websites or in the dedicated sections of our Mobile Apps.

To learn more about third-party cookies and the privacy policy of our partners, we invite you to consult the following links:

- Akamai: <https://www.akamai.com/fr/legal>
- Airship: <https://www.airship.com/legal/privacy/>
- Apple: <https://www.apple.com/fr/legal/privacy/fr-ww/>
- Crazy Egg: <https://www.crazyegg.com/privacy>
- Facebook Ads: <https://www.facebook.com/about/privacy/>
- Instagram: <https://about.instagram.com/blog/announcements/instagram-community-data-policy/>
- Google Advertising Products: <https://policies.google.com/privacy>
- Google Analytics: <https://support.google.com/analytics/answer/6004245?hl=fr>
- Google reCAPTCHA: <https://policies.google.com/privacy>
- Snapchat: <https://www.snap.com/fr-FR/privacy/privacy-policy>
- TikTok: <https://www.tiktok.com/legal/privacy-policy-eea?lang=fr>
- Pinterest: <https://policy.pinterest.com/fr/privacy-policy>
- Xandr: <https://about.ads.microsoft.com/en-us/solutions/xandr/platform-privacy-policy>
- Outbrain: <https://www.outbrain.com/privacy/>



- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

The partners listed above act as processors and/or joint controllers of your Data, in accordance with the agreements concluded with each partner.

## 9. Who do we share your Data with ?

We share your Data with:

- Our internal teams who need to know.
- Our subcontractors whose involvement is strictly limited to the service they perform on our behalf. We ensure that our subcontractors provide sufficient guarantees to implement security and confidentiality measures for the Data they access in the course of their missions as defined by the applicable regulations.
- Our subsidiaries identified in section 1 of this Policy.

## 10. To which country do we transfer your Data ?

Your Data is mainly stored in Belgium and, in part, within the European Union. The Website management is carried out in Belgium. The Pathé Belgium Mobile App is managed by Pathé Cinémas Services, headquartered in France.

Some of your Data is transferred to the United States. Indeed, some of our contractual partners may have access to your Data in relation to Google Analytics and the management of the infrastructure hosting the website. In this case, some of your Data may be transferred outside the European Union by our service providers for statistical and maintenance purposes. Data storage outside Switzerland and the EU is always accompanied by the conclusion of standard contractual clauses (SCC) compliant with the GDPR and accepted by the European Union.

## 11. What measures are implemented to ensure the security of your Data ?

We implement appropriate technical and organizational measures to ensure a level of security for your Data that is adapted to the risks of loss, access, modification, alteration, unauthorized disclosure, or destruction.

Access to your Data is strictly controlled and reserved for employees of Pathé Belgium S.A., our subcontractors, and external advisors.

In accordance with current regulations, we implement physical and electronic backup procedures for the Data collected on the Website and the Mobile App. We draw your attention to the fact that we do not control the risks related to the operation of the Internet, including the occurrence of occasional events that may result in Data loss or breaches of Data confidentiality during Internet transmission.

We cannot be held responsible in case of interruption of access to the Websites or Mobile App due to force majeure or reasons beyond our control.

In the event of a security breach of your Data, this violation may be subject to notification to the supervisory authority and communication to you when the applicable regulations require it.

## 12. What are your rights and how to exercise them ?

**What are your rights?** Depending on your personal situation, you have the rights listed below

**Right of access:** you have the right to access the personal Data we hold about you. This gives you the right to receive a copy of your Data and information related to the processing of your Data.

**Right to rectification:** you have the right to ask us to correct your Data if it is inaccurate or outdated.

**Right to erasure:** you have the right to request the deletion of your Data. Please note that your Data can only be deleted when it is no longer necessary for the purposes for which we collected it and we have no other legal basis to process it.

**Right to object:** when we process your Data based on a legitimate interest, you can object to this processing when your particular situation justifies it. In some cases, we may not comply with your request if we demonstrate that the legitimate interest we pursue prevails.

**Right to restriction:** you can request the restriction of the use of your Data, particularly when the Data is not or no longer necessary, or if you have contested its accuracy, while we verify its accuracy.

**Right to Data portability:** we will provide you, or a third party you have chosen, your Data in a structured, commonly used, and machine-readable format. Note that this right only applies to your Data that we process in an automated manner, (i) with your consent or (ii) in the context of the performance of a contract concluded with you.

**Fate of Data after death:** in accordance with Article 48 of Law No. 78-17 of January 6, 1978, relating to Data processing, files, and freedoms (the "Data Protection Act"), you have the right to define directives regarding the fate of your Data after your death. These directives can be general or specific and can be modified or revoked at any time.

**Withdrawal of consent:** If the processing of your Data is based on your consent, you also have the right to withdraw your consent at any time.

### How to exercise your rights?

If you have an online Pathé account, you can directly exercise your right of access and rectification of your Data by logging into your Pathé account on the Websites or Mobile Apps, in the dedicated sections:

- Request a copy of the Data collected by Pathé Belgium S.A.;
- Request the deletion of your account and all your Data held by Pathé Belgium S.A.

You can manage your Cookie consent settings and other trackers at any time by clicking on the links available at the bottom of our Websites or in the dedicated sections of our Mobile Apps.

If you have an online Pathé account, you can manage the settings for receiving our best offers on our Websites or Mobile Apps at any time.

If you no longer wish to receive movie news and our best offers, you can also use the unsubscribe link in the email sent to you.

For any other request, you can contact us:

- Via the contact form available on our Website (the "Contact Us" link available at the bottom of the page)
- By email at the following address: [dpo.fr@pathe.be](mailto:dpo.fr@pathe.be) for requests that cannot be made on your Pathé account or via the contact form
- By post at the following address: DPO – EMPIRE, Grand-Rue 141-143, 6000 Charleroi. In this case, to process your request efficiently, please specify your first and last name and your email address. You should also specify in your request whether you wish to receive the response by post or electronically.

Please note that if the information you provide does not allow us to confirm your identity or if reasonable doubt persists, we may ask you to provide additional information or documents. We will respond to you as soon as possible and in any case within one month of receiving your request, which may be extended by an additional month depending on the request.

## 13. Submitting a complaint to the Data Protection Authority

In case of a complaint, you can contact the Data Protection Authority, which is the competent authority for personal Data protection:

- By mail: Data Protection Authority, Rue de la Presse, 35, 1000 Brussels Tel: +32 (0)2 274 48 00
- By email: [contact@apd-gba.be](mailto:contact@apd-gba.be)