# PERSONAL DATA PROTECTION CHARTER

Pathé Californie Casablanca (hereinafter referred to as "We") wishes to provide you, as a Customer, with an overview the processing of your personal data (your "Data") and of your rights under the relevant applicable regulations.

This charter (the "Charter") applies to all services offered by Pathé Californie Casablanca, in particular when you create your customer account and purchase tickets on our website <u>www.pathe.ma</u> (the "Website"), our mobile application or in cinemas.

We may modify the Charter by updating this page. We therefore invite you to consult it regularly in order to make sure you agree to any changes.

We consider that you have accepted this Charter when you use our services.

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# <u>1.</u> Who are we?

Pathé is a group of companies in production, distribution and exhibition of films in France and abroad. Pathé Cinémas covers the exhibition of films. Pathé Californie Casablanca is a network of cinemas in Morocco, part of Pathé Cinémas.

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

For the management of cinemas, reservation and purchase of tickets and prepaid cards, the management of customer relations, the purchase of drinks and confectionery, the sending and information of personalised offers, security and protection of persons and property in the context of video protection, the party responsible for processing your Data is Pathé Californie Casablanca, *registered under number ICE* 001981172000073, whose *registered office is located at the following address: Pathé Californie Casablanca, Centre commercial Marjane Californie, CT 1029 Ain Chock, Casablanca, Morocco.* 

Pathé Californie Casablanca belongs to Pathé Cinémas.

For the management of the <u>www.pathe.ma</u> website (hereinafter referred to as the "Site") and its mobile application, the data controller is Pathé Cinémas Services, registered under number 392 706 412 in the Paris Trade and Companies Register, with its registered office at 1 rue Meyerbeer 75009 Paris, France.





# 3. What types of Data do we collect?

We offer various services to help you get the most out 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 Site or on the mobile application: your title, your first and last name, your email address, your notification preferences for receiving commercial offers, your date of birth, your postal code. In your personal space, you can also fill in following optional personal details: landline telephone, mobile telephone, postal address, town, country.
- Automatically when you access the Website or mobile application: your IP address, technical information about your browser and terminal, and Browsing Data.
- When you make a reservation or purchase online or in the cinema: the film, the screening chosen, the cinema concerned, your method of payment (bank card, prepaid card or any other means of payment), your bank card imprint (to manage the payment and any refund, and where applicable, if you request it, to facilitate your subsequent purchases), transactional information, where applicable your first and last names, the email address to which your online reservation is sent.
- If you wish to book a private room for: a birthday, a school screening, a corporate event: surname, first name, email, your cinema, and the message you have written (all this data is collected via the contact form on the Site).
- When you contact our customer service department or one of our cinemas: your surname, first name, email address (if applicable, from your customer account if you are logged in), telephone number and information about your request (film, cinema concerned, screening concerned, etc.) and any attachments relating to your request. We keep a record of our exchanges in order to process your request.
- When you take part in competitions or events: your first and last name, email address, telephone number and postal address (information may vary depending on the competition or event).
- When you register on a booking terminal, on our Website or when creating/using your account: in order to receive by email a promotional offer or film news and our best offers (optional): your email address.
- When you visit some of our cinemas that use video protection systems, we may collect images of you. Pathé collects this data and generally uses the video protection system to :
  - ensuring the safety of people and property in cinemas ;
  - resolve incidents and take disciplinary or legal action in the event misconduct.

The video images are kept for 1 month or, in the event of proceedings, for the duration of the proceedings. In this case, the images are only accessible to persons authorised to take part in the proceedings.

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

We use and process your Data for several reasons:

- manage your Pathé online account (record and process your online reservations, access your reservation history; record and process your online requests for information or complaints to our customer service department, etc.);
- online seat reservation and purchase and online purchase of prepaid cards;
- managing the privatisation of cinemas for events (birthdays, school screenings, corporate events)
- managing your customer service requests;
- customer relationship management and improvement;
- the sending personalised information and offers (such as the programme of your favourite cinema), previews or events, suggesting films you are likely like on



your customer area...);

- the organisation promotional operations such as competitions, particularly via the networks social ;
- carrying out statistical studies, in particular to better meet your expectations;
- to improve the Site and/or the mobile application and your browsing experience;
- security and protection of people and property in cinemas through video protection;

We may also store and process your Data for the purposes of combating fraud and payment incidents as well as to defend our interests in the event of a dispute or legal action.

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

You are under no legal obligation to provide us with any information about yourself.

However, we cannot provide you with the requested service if you do not provide the information shown as mandatory on our collection forms.

In addition, you are free to provide us with the Data identified as optional, the collection of which will enable us to improve the service offered.

### 6. How do we obtain your consent?

We will only collect, process and use your Data if we have obtained your clear, explicit and unequivocal consent.

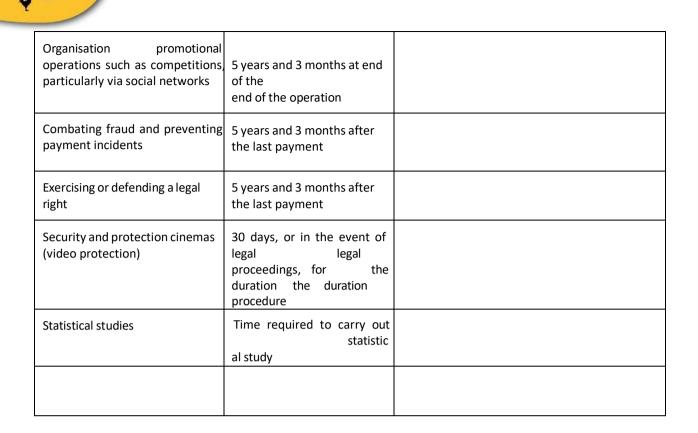
We collect your consent in the following situations:

- when you create your Pathé account;
- when accepting web browser cookies (see 8. Cookies);
- when booking online;
- when we offer you personalised services or promotional operations.

### 7. How long will your Data be kept?

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

Purpose	Retention period before deletion or anonymisation	Additional comments
Us <mark>ing your Pathé online</mark> account	During the period of use and 3 years after the last activity	
Online booking of sessions and online purchase of prepaid cards	5 years and 3 months from completion of the transaction	Retention of credit card data for 13 months from the date of payment
Remote payment by credit card	13 months following the debit date or 15 months in the case of deferred debit cards. The code for security CVC is deleted at the end of the transaction	
Privatisation of a cinema	5 years and 3 months at end of the transaction	
Management of requests to customer service	5 years and 3 months from the date of application	
Securing of Site and of the mobile application	6 months	
information and offers personalized	Until withdrawal consent	





# 8. Cookies

When you visit our Website or use our mobile application, cookies and other tracking devices are likely be deposited and read in the browser of computer or terminal.

These cookies enable us to automatically collect Data in order to :

- to enable browsing on our Site or our mobile application;
- track your browsing and measure the audience;
- personalise your browsing experience;
- offer you advertising corresponding to your centres of interest.

Cookies are kept for a maximum of 13 (thirteen) months from the time they are placed on your browser or terminal. At the end of this period, new consent will be required. You may withdraw your consent at any time.

Type of cookie	Partner	Maximum service life	Consequences of blocking
Technical cookies	Pathé Cinémas	12 months	An awkward experience navigation
Consent management	Didomi	12 months	Loss of consent, which must be renewed <mark>each</mark> time yo <mark>u lo</mark> g on
Securing	Akamai	2 hours 6 months	Blocking the creation and the second se
Performance m <mark>easu</mark> rement	Ak <mark>am</mark> ai 🛛	2 hours	No consequences
Audience	Go <mark>og</mark> le Analytics	13 months	No consequences

To find out more about third-party cookies and the privacy policy of our partners and/or to exercise your rights with our partners, please consult the following links:

- Akamai: https://www.akamai.com/fr/legal
- Google Analytics: https://support.google.com/analytics/answer/6004245?hl=fr

Cookies are deposited either by us or by third parties depending on the choices you have made when setting your consent parameters. Cookies are deposited when you first visit the Site or when you first use the mobile application.

As a reminder, you can configure your consent to cookies at any time by clicking on the following link You can access the "Configure your cookies" section at the bottom of the page on our website <u>www.pathe.ma</u> or in the "Configure your cookies" section.

"My Consents is our mobile application.



# 9. With whom do we share your Data?

We share your Data with :

- Our in-house teams, depending on requirements (marketing, customer relations, IT, legal, etc).
- Our subcontractors, whose involvement is strictly limited to services they perform on our behalf. We ensure that our subcontractors offer sufficient guarantees to the implementation of security and confidentiality measures for the Data to which they have access in the performance of their duties, as defined by the applicable regulations.
- Pathé Cinémas Services for management of the Site and mobile application

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

We transfer your Data mainly to :

- Personal data collected as part of supplier management is transferred to the parent company Pathé Services, located in France, for the purpose of managing and validating supplier payments;
- Personal data collected as part of customer management is transferred for the following purposes hosting at Azure Datacenter in France ;
- Personal data collected as part of the management of online sales of the website and of the application are transferred:
  - for hosting purposes to the Amazon service provider in France;
  - for development purposes to JEMS in France; and
  - for Newsletter communication purposes in England.

In accordance with the legal provisions governing personal data, all of the above-mentioned processing and transfers must be declared or authorised in advance.

These data transfers are subject to appropriate safeguards, in particular the signing of contractual clauses guaranteeing the confidentiality and security of the Data.

### 11. What measures are taken to guarantee the security of your Data?

We implement appropriate technical and organisational measures to guarantee a level security for your Data appropriate to the risks of loss, unauthorised access, modification, alteration, disclosure or destruction.

Access to your Data is strictly controlled and reserved for employees of Pathé Californie Casablanca, its subcontractors and entities of the Cinémas Pathé Group.

In accordance with the regulations in force, Pathé Californie Casablanca implements physical and electronic backup procedures for Data collected on the Website and mobile application.

We draw your attention to the fact that Pathé Californie Casablanca does not control the risks associated with the operation of Internet and in particular the occurrence of one-off events that may result in loss of Data or breach of confidentiality of Data transiting over the Internet.

Pathé Californie Casablanca shall not be held liable for any interruption in access to the Website and for any loss or damage suffered as a result thereof.

the mobile application for reasons force majeure or beyond its control.

In the event of a breach in the security of your Data, this breach will be notified to the competent supervisory authorities, the personal data protection commission in Morocco, as well as being brought to your attention where required by the applicable regulations.

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

### What are your rights?

Depending on your personal situation, you have the rights listed below.

- Right access: you have the right access the personal data we hold you. This gives you the right to receive a copy of your Data and information about the processing of your Data.
- Right to rectification: you have the right to ask us to correct your Data if it is inaccurate or obsolete.
- Right to erasure: you have the right to request the erasure your Data. Please note that your Data may only be deleted when it is no longer necessary for the purposes for which we collected it and we have no other legal basis for processing it.
- Right object: where we process your Data on the basis of a legitimate interest, you may object to such processing where this is justified by your particular circumstances. In certain cases, we may not accede to your request if we demonstrate that the legitimate interest we are pursuing prevails.
- Right of limitation: you may request that the use of your Data be limited, in particular where the Data is not or is no longer necessary, where you have contested the accuracy of the Data, we verify its accuracy.
- Right to portability: we will provide you, or a third party chosen by you, with your Data in a structured, commonly used and machine-readable format. Please note that this right only applies to your Data that we process automatically (i) with your consent or (ii) in the performance of a contract with you.
- 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 can you exercise your rights?

If you have a Pathé account, you can exercise your right to rectify your Data directly logging into your Pathé account on the <u>www.pathe.ma</u> website or the mobile application, under the heading

You can manage your Cookie consent settings at any time by clicking on the link "Cookies".

You can access the "Configure your cookies" section at the bottom of the page on our website <u>www.pathe.ma</u> or in the "Configure your cookies" section.

"My Consents is our mobile application.

If you have a Pathé account, you can manage the settings for receiving film news and our best offers at any time in the "Notifications" section on our website <u>www.pathe.ma\_or in our</u> mobile application.

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

For all other enquiries, please contact us:

- Via the contact form available on our Site ("Contact us" link at the bottom of the page);
- By e-mail to the following address: <u>dpo@pathe.ma</u> for requests that cannot be made on your personal space or via the contact form.
- By post to the following address

Pathé Californie Casablanca

Centre commercial Marjane Californie CT 1029 Ain Chock Casablanca, MOROCCO

- In this case, in order to process your request efficiently, please give us your name and address.



first name, email address and date of birth attach a copy of your ID. You should also specify in your request whether you wish to receive a reply by post or by e-mail.

We will reply as soon as possible, and in any event one month of receipt of your request, which may be extended by a further month depending on the request.

## 13. Submit a complaint to the Data Protection Commission

If you consider that we have not processed your Data in accordance with the regulations on the protection of personal Data, you may lodge a complaint with the CNDP: www.cndp.ma