



PERSONAL DATA PROTECTION CHARTER

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

This charter ("the Charter") applies to all services offered by Pathé Tunisie, in particular when you create your customer account, book screenings or buy tickets on our website www.pathe.tn ("Website"), our mobile application or in the cinema.

We may modify the Charter by updating this page. We therefore invite you to consult it regularly to ensure that you are in agreement with any changes.

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

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THE CHARTER IN A NUTSHELL :

<p style="text-align: center;"><u>Data collected</u></p> <p>When you subscribe to one of our services (creating an online account, buying a ticket online or in the cinema), we ask you for certain information.</p> <p>In addition to the Data collected directly from you, other Data may be automatically collected or generated by our computer systems.</p>	<p style="text-align: center;"><u>What we do with your Data</u></p> <p>The collection of your Data enables us to provide you with the services you have subscribed to and also to get to know you better so that we can offer you personalised services.</p>
<p style="text-align: center;"><u>Recipients of the Data</u></p> <p>Your Data is intended for all our cinemas, our various departments and the service providers authorised to process your Data on our behalf in order to provide you with the associated services.</p>	<p style="text-align: center;"><u>Location and transfer of your Data</u></p> <p>We store your Data mainly in the European Union European.</p> <p>Some of your Data may be transferred outside European Union, in particular to the United States, by certain functionalities. These data transfers are governed by appropriate guarantees, in particular by the signature of Standard Contractual Clauses validated by the European Union.</p>
<p style="text-align: center;"><u>Setting your options</u></p> <p>You can manage your consent settings at any time. Cookies by clicking on the link You can access the "Configure your cookies" section at the bottom of the page on our website www.pathe.tn or in the "My consents" section of our mobile application.</p> <p>If you have an online customer account, you can manage the settings for receiving film news and our best offers at any time in the "My preferences" section on our website www.pathe.tn or "My notifications and newsletters" in our mobile application.</p> <p>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.</p>	<p style="text-align: center;"><u>Contact us</u></p> <p>If you have any questions about the Charter, please contact us:</p> <ul style="list-style-type: none"> - via the contact form on our Website (link To contact us, click on "Contact us" at the bottom of the page; - Electronically to following address: dpo@pathe.tn for requests that cannot be made via your personal space or the contact form. - by post to the following address <p style="text-align: right;"> Pathé Tunisia 6th floor Office 2 Block "Bimmeuble PROMED BUILDING Centre Urbain Nord 1082 Tunis </p>

1. Who are we?

Pathé Tunisia is a network of cinemas under the Pathé banner, comprising :

- Pathé Tunis City - Centre Commercial Tunis City, Cebelet Ben Ammar, Ariana 2032.
- Pathé Azur City - Centre Commercial Azur City, Autoroute A1, Radès entrance, Ben Arous 2098.
- Pathé Mall of Sousse - Mall of Sousse, Kalâa Kebira, 4060.

2. Who is responsible for processing your Data?

The person responsible for processing your Data is Les Grands Ecrans de Tunis City, a limited company registered in the national register of companies under number 1510267Y and whose registered office is located at the following address: Cebelet Ben Ammar, Ariana, 1080.

Pathé Tunisie is part of the Pathé network of cinemas. Pathé Cinémas Services SNC manages the Website and mobile application.

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 use your customer account on the Website or mobile application: your favourite films or the films you would like to see and your profile photo if you add it.
- Automatically when you access the Website or mobile application: your IP address, technical information about your browser and terminal, and Browsing Data.
- With your explicit consent: your geolocation is used to locate the nearest cinema and is not stored.
- 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 make a group reservation: the email addresses of those accompanying you;
- 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 your request. We keep a record of our exchanges in order to process your request.

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

We use and process your Data for several reasons:

- management of your online customer account (registration and processing of your online bookings, access your booking history; registration and processing of 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 your customer service requests;
- customer relationship management and improvement;
- the sending of personalised information and offers (sending the programme of your favourite cinema, previews or events, suggesting films you are likely like on your customer area, etc.);
- the organisation of promotional operations such as competitions, particularly via social networks;
- carrying out statistical studies, in particular to better meet your expectations;
- improving the Website and your browsing experience;

We may also store and process your Data for the purposes of combating fraud and preventing 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 remain free to provide us with the Data identified as optional whose collection will enable us improve the service we offer.

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 creating a customer account;
- when accepting web browser cookies (see 8. Cookies);
- when booking online;
- when we offer you personalised services.

7. How long is your Data 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
Using the online customer 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 at end of the transaction	Retention of credit card data for 13 months from the date of payment
Managing customer service requests	5 years and 3 months at end of the request	
Sending information and offers personalized	Until consent is withdrawn	
Organisation of promotional operations such as competitions, particularly via social networks	5 years and 3 months after the end of the operation	
Combating fraud and preventing payment incidents	5 years and 3 months after the last payment	
Exercise or defence of a right in justice	5 years and 3 months after the last payment	

8. Cookies and similar technologies

When you visit our or use our mobile application, cookies and similar technologies are used. are likely be deposited and read in the browser of your computer or terminal. These cookies enable us to automatically collect Data in order to :

- to enable browsing on our Website;
- 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 each time you log on
Securing	Akamai Google reCaptcha	2 hours 6 months	Blocking the creation and logging in to the customer account
Performance measurement	Akamai mPulse	2 hours	No consequences
Audience	Google Analytics	13 months	No consequences
Personalised advertising (mobile)	Airship	13 months	No consequences

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 link

You can access the "Configure your cookies" section at the bottom of the page on our website www.pathe.tn or in the "Configure your cookies" section.

"My Consents is our mobile application.

To find out more about third-party cookies and the privacy policy of our partners, consult the following links:

- Airship: <https://www.airship.com/legal/privacy/>
- Akamai: <https://www.akamai.com/fr/legal>
- Google reCAPTCHA: <https://policies.google.com/privacy>
- Google Analytics: <https://support.google.com/analytics/answer/6004245?hl=fr>



9. Who will receive your Data?

Pathé Tunisie is the recipient of your Data in its capacity as controller. Pathé Cinémas SNC manages the Website and the mobile application.

10. With whom do we share your Data?

We share your Data with our subcontractors who help us to manage the services we offer you, in particular the , customer service and payment services. The involvement of each of these subcontractors is strictly limited to the services they perform on our behalf.

We ensure that our subcontractors offer sufficient guarantees to ensure 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.

11. To which countries do we transfer your Data?

We store your Data mainly in European Union.

Some of your Data may be transferred outside European Union, in particular to the United States, by means of certain functionalities. To find out more about these functions and the privacy policy of our partners, please consult the following links:

- Google Analytics: <https://support.google.com/analytics/answer/6004245?hl=fr>
- Google reCAPTCHA: <https://policies.google.com/privacy>

These data transfers are governed by appropriate safeguards, in particular by the signing of Clauses Standard contracts validated by European Union.

12. 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 Tunisie, its subcontractors and the Pathé Cinémas Group.

In accordance with the regulations in force, Pathé Tunisie is implementing the following safeguard procedures physical and electronic data collected on the .

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

Pathé Tunisie shall not held liable in event of interruption access to the Website for reasons of 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 Instance Nationale de Protection des Données Personnelles de Tunisie, as well as being brought to your attention where required by the applicable regulations.



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

What are your rights?

As a data subject, you have the right to access your Data, the right to rectify any inaccuracies in your Data and the right to have your Data deleted if it is no longer required to provide you with a service, a right to oppose and limit the processing of your Data, and a right to the portability of your Data, i.e. the right to receive the Data that you have communicated to us in a structured, commonly used and computer-readable format in order to transmit them to another data controller.

How can you exercise your rights?

If you have an online customer account, you may directly exercise your right to access and rectify your Data by logging into your customer account on the www.pathe.tn website or the mobile application, in the "My Privacy" section to request the deletion of my account and all my personal data held by Pathé Tunisie.

You can manage your cookie consent settings 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 www.pathe.tn or in the "Configure your cookies" section.

"My Consents is our mobile application.

If you have an online customer account, you can manage your news reception settings at any time.

films and our best offers in the "My preferences" section on our website www.pathe.tn or

You can also access "My notifications and newsletters" in our 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 any other request,

please contact us:

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

Pathé Tunisia
6th floor Office 2 Block
"Bimmeuble PROMED BULDING
Centre Urbain Nord 1082 Tunis

- In this case, in order to process your request efficiently, please give us your full name, email address and date of birth and attach a copy of your identity document. 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 receiving your request, which may be extended by a further month depending on the request.

14. 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 National Data Protection Authority (INPDP): <https://www.inpdp.tn>