



PRIVACY POLICY

Pathé Films (hereinafter referred to as “We”) wishes to provide you, as a Customer, Visitor and/or User (hereinafter referred to as “You”), with an overview of the processing of your personal data (your “Data”) and of your rights under the applicable regulations.

This policy (“the Policy”) applies to all the services offered by Pathé Films, and in particular when you create your account, download our promotional content, or subscribe to our newsletter on our Website www.pathefilms.com (“Website”).

We may make changes to this Policy by updating this page. Therefore, please consult this page regularly to ensure that you agree with any changes.

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POLICY SUMMARY

<p style="text-align: center;"><u>Collected Data</u></p> <p>When you sign up to one of our services (by creating an online account, downloading our promotional content, purchasing e-tickets, or subscribing to our newsletter), we ask you to provide some Data.</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 do we do with your Data?</u></p> <p>Collecting your Data enables us to provide you with the services you have signed up to and to get to know you better so that we can provide you with personalized offers.</p>
<p style="text-align: center;"><u>Data recipients</u></p> <p>Pathé Films is the recipient of your Data as well as our authorized service providers who process your data on our behalf to provide you with the associated services.</p>	<p style="text-align: center;"><u>Location and transfer of your Data</u></p> <p>We primarily store your Data within the European Union.</p> <p>Some of your Data may be transferred outside of the European Union for the optional functionality of playing YouTube trailers. These data transfers are governed by the adequacy decision “Data Privacy Framework” adopted by the European Commission, applicable to YouTube, a self-certified organization.</p>
<p style="text-align: center;"><u>Configuring your preferences</u></p> <p>You can manage your cookie consent settings at any time on the Website.</p> <p>If you have an online professional account, you can directly manage your alerts on your account settings.</p> <p>If you no longer wish to receive news about films or special offers from us, 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 concerning this Policy, please contact us:</p> <ul style="list-style-type: none">- By using the contact form available on our Website- By emailing the following address : dpo@pathe.fr- By post to the following address: <p style="text-align: center;">DPO PATHÉ 1 Rue Meyerbeer 75009 Paris (France)</p>

1. Who are we?

Pathé is a group of companies working in the production, distribution, and exploitation of films in France and abroad.

Pathé Films is a subsidiary of Pathé. Its activities include the production and distribution of films.

2. Who is responsible for processing your Data?

The data controller for your Data on the www.pathefilms.com website is Pathé Films, a simplified joint-stock company, whose capital is 5 545 420 euros, Trade and Company Register of Paris No 780 077 921, with its registered office located at 1 Rue Meyerbeer – 75009 Paris, France.

3. What types of Data do we collect?

We offer various services for which we collect different types of information about you. We may collect the following types of Data:



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- **When you create your Pathé account by filling out the form on the Website:** your first and last name, your email address, your professional category, your job position, a telephone number, and your notification preferences for receiving promotional offers.
- **Automatically, when you access the Website and/or log on to your Pathé account:** your IP address, technical connection logs, technical information about your browser and device as well as browsing Data.
- **When you request a private projection for a festival:** your name, surname, email address, telephone number, postal address, city, and country.
- **When you contact us via our “Contact us” form:** your name, surname, email address (if applicable, from your Pathé account if you are logged in), information about your enquiry. We keep a record of our conversations in order to be able to process your enquiry.
- **When you subscribe to our newsletter:** your email address.

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

We use and process your Data for several reasons:

- **To manage your online Pathé account** (to create an account, to record your preferences, to record and process your request for information or complaints you have made online and sent to our customer service department, etc.);
- **To secure the Website and improve your browsing experience;**
- **To manage your request for a private projection;**
- **To manage your request via our contact form;**
- **To send information by email:** proposal of promotional materials that may be useful for your professional activity;
- **Fraud prevention** (e.g., non-professional use); and
- **To manage your GDPR rights requests.**

Additionally, we may also store and process your Data to defend our interests in the event of a dispute or legal action.

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

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

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

Additionally, You are free to provide us with the optional data, which will help us improve the service offered.

6. How do we obtain your consent?

Where required by applicable regulations, we only collect, process, and use your Data if you have provided your clear, explicit, and unequivocal consent.

We obtain your consent in the following situations:

- When accepting web browser cookies (see 8. Cookies);
- When you subscribe to our newsletter.



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7. How long will your Data be retained?

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

Below you will find the different retention periods for your Data, organized by service offered.

Purpose	Legal basis	Retention period before deletion or anonymization
Managing your online Pathé account	Contract	During the period of use, then for 2 years from the last recorded activity
Securing the Website and improving your browsing experience	Legitimate interest	6 months
Managing your request for a private projection	Legitimate interest	Necessary period to resolve your request and during the private projection
Managing the request made via our contact form	Contract Legitimate interest	Duration required to resolve the issue and 5 years after the date of the enquiry in the case of claims and complaints
Sending information by email	Consent	Until you withdraw your consent or 3 years from the date on which the last contact took place
Fraud prevention	Legitimate interest	5 years from the date of the last download
Managing your request to exercise your GDPR rights	Legitimate interest	Proof of sending and receiving the response that has been provided to you is kept for 5 years
Exercising or defending a legal right	Legitimate interest	5 years from the date on which the facts in dispute became known

8. Cookies and similar technologies

When you visit our Website, cookies and other trackers may be placed on and read in the browser you are using on your computer or end device.

These cookies and other similar technologies enable us to collect Data to:

- Enable browsing on our Website;
- Track your browsing and measure audience;
- Personalize your browsing experience;
- Offer you advertising that matches your interests.



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The maximum retention period for cookies is 13 (thirteen) months from the time they are placed on your browser or device. Upon expiry of this period, new consent will be required. You may withdraw your consent at any time.

Type of cookie or similar technology	Partner	Maximum duration	What happens if you block these cookies?
Consent Management	Didomi	12 months	Consent is not stored and will have to be renewed each time you access the Website
Authentication	Okta Auth0	12 months	Pathé account creation or connection and customer service enquiries may be blocked
Security	Akamai	2 hours	Pathé account creation or connection may be blocked
	Google reCAPTCHA	6 months	
Audience measurement	Google Analytics	13 months	No consequences
Reading trailers	YouTube	13 months	No trailers reading

Cookies are placed on your device either by us or by third parties according to the choices you submitted when configuring your Cookies consent settings on your first visit on the Website.

As a reminder, you can configure your cookies consent at any time by clicking on the **Configure your cookies** link. This can be found at the bottom of the page on our Website.

To find out more about third-party cookies, to view our partners' privacy policies 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>
- Google reCAPTCHA: <https://policies.google.com/privacy>
- YouTube: <https://policies.google.com/privacy>

The partners listed above act as data processor(s) and/or joint data controller(s) when it comes to the processing 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 that need to have access to the Data;
- Our data processors whose involvement is strictly limited to the services they perform on our behalf. We ensure that our data processors provide sufficient guarantees regarding the implementation of security and confidentiality measures for the Data to which they have access within the scope of their services, as defined by applicable regulations;
- Potential joint controllers.



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10. To which countries do we transfer your Data?

We primarily store your Data within the European Union.

Some of your Data may be transferred outside of the European Union for the optional functionality of playing YouTube trailers. These data transfers are governed by the adequacy decision “Data Privacy Framework” (DPF) adopted by the European Commission on July 10, 2023, allowing data transfer to YouTube, a self-certified organization listed on the Data Privacy Framework List maintained by the US Department of Commerce ([Data Privacy Framework List](#)).

To know more about these functionalities and the privacy policy of our partners, we invite you to consult the links listed in section 8 of this Policy.

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

We implement appropriate technical and organizational measures to guarantee a sufficient level of security to protect your Data against the risks of loss, access, modification, alteration and unauthorized disclosure or destruction.

Access to your Data is strictly limited and restricted to employees of Pathé Films, our data processors, and our external counsels.

In accordance with applicable regulations, we implement physical and electronic backup procedures for Data collected on the Website.

We would like to draw your attention to the fact that we have no control over the risks inherent to internet usage and, in particular, the occurrence of specific events that may lead to the loss of Data or breach the confidentiality of Data transferred online.

We may not be held liable in the event that access to the Website is interrupted for reasons of force majeure or for reasons beyond its control.

In the event of a breach to the security of your Data, this will be notified to the CNIL and brought to your attention where required by the applicable regulations.

12. What are your rights and how do you 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 have on 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 that your Data be deleted. Please note that your Data may only be deleted provided this data is no longer necessary for the purposes for which we originally collected it and provided we have no other legal basis for processing it.

Right to object: where we process your Data on the basis of a legitimate interest, you may object to such processing if this is justified by your particular situation. In certain cases, we may not comply with your request if we demonstrate that our legitimate interests prevail.



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Right to restrict processing: you may request that the use of your Data be restricted, in particular if the Data is not or is no longer necessary or if you have contested the accuracy of the Data, while we verify it.

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 data that we process in an automated manner, (i) with your consent or (ii) as part of the performance of a contract with you.

What happens to data after death? In accordance with Article 48 of French Act No 78-17 of 6 January 1978 relating to data processing, data files and individual liberties (the “French Data Protection Act”), you have the right to stipulate directives concerning what should happen to your data after your death. These directives may be general or specific in nature and may be amended or revoked at any time.

If no directives have been stipulated or if the directives do not state otherwise, your heirs will be able to exercise your rights after your death under the conditions set out in Article 85 of the French Data Protection Act.

Furthermore, 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 an online Pathé account, you can exercise your right to access and correct your Data directly by logging into your Pathé account on the Website and going to the **Privacy** section. You can then choose to:

- Request a copy of the data collected by Pathé Films;
- Request the deletion of my account and all my personal data;
- Change your credentials in the “Contact us” section.

You can manage your cookie consent settings at any time by clicking on the **Cookies management** link. This can be found at the bottom of the page on our Website.

If you have an online Pathé account, you can manage the settings for receiving special offers from us at any time in the **My Alerts** section on our Website.

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

For any other requests, please contact us:

- By using the contact form on our Website (**Contact us** link at the bottom of the page)
- By emailing the following address: dataprivacy@pathe.com
- By post to the following address: **DPO Pathé Films 1 rue Meyerbeer, 75009 Paris (France)**

In this case, in order to process your request efficiently, we would be grateful if you could provide us with your full name and email address. In your request, you will also need to specify whether you wish to receive a response by post or email. Please note that if the information you provide does not allow us to confirm your identity or if there is reasonable doubt, we may ask you to provide us with additional information or documents.

We will reply to you as soon as possible and, at the latest, one month after receiving your request, which may be extended by a further month depending on the nature of the request.

13. Data Protection Officer

We appointed a Data Protection Officer (DPO) who can be contacted at the following email address: dataprivacy@pathe.com.



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14. Submitting a complaint to the CNIL

If you believe that we have not processed your Data in accordance with data protection regulations, you may submit a complaint to CNIL <https://www.cnil.fr/fr/plaintes>.

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