

PRIVACY POLICY (PATHE.FR)

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The Pathé Cinémas Services, Pathé Cinémas France, Pathé Home, Pathé CinéPass, and Pathé CinéCartes (hereinafter referred to as “We” or “Pathé”) wish to give you, as a Customer or User (hereinafter referred to as “You”) 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 Cinémas Services, Pathé Cinémas France, Pathé Home, Pathé CinéPass, and Pathé CinéCartes, particularly when you create your Pathé account, make purchases or rentals, book cinema screenings, or subscribe to our newsletter, on our websites www.pathehome.com or www.pathe.fr ("Websites"), our mobile applications on iOS and Android, your connected television or smart TV ("Applications" or “Apps”).

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

Data collected 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. 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).	What we do with your Data 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.
Recipients of the Data Your Data is intended for our VOD service for Pathé Home, our cinemas for Pathé Cinemas, our departments or subsidiaries that need to access it, and authorized service providers processing your Data on our behalf to deliver the associated services to you.	Location of your Data and transfer We mainly store your Data within the European Union. 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.
Setting your options You can manage the settings of your Cookie consents and other trackers on our Websites or Apps at any time. 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. 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.	Contact us For any questions regarding the Policy, you can contact us: - at the following email address: dpo@pathe.fr - or by mail at the following address: DPO PATHE 1 Rue Meyerbeer 75009 Paris (France)

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 France, the implementation of the offers and services provided by Pathé Cinémas involves the following subsidiaries (hereinafter referred to as "Pathé Cinémas"):

- Pathé Cinémas Services (Société en Nom Collectif, RCS Paris 392 706 412) manages and curates the content of the website www.pathe.fr, the Pathé France Applications, and customer relationship management ;
- Pathé Cinémas France (Société par actions simplifiées, RCS 444 567 127) handles the operation of cinema theaters in France ;
- Pathé Home (Société par actions simplifiée, RCS 508 965 860) oversees the distribution of films and, more broadly, audiovisual works via video-on-demand (hereinafter "VOD") across all types of networks. The VOD activity also involves the subsidiary Thuisbioscoop B.V (61817953) for the development and maintenance of the website www.pathehome.com and Pathé Home applications ;
- Pathé Cinépass (Groupement d'Intérêt Economique, RCS Paris 432 845 683) manages the CinéPass subscriptions ;
- Pathé CinéCartes (Groupement d'Intérêt Economique, RCS Paris 754 049 088) manages national prepaid cards.

2. Who is responsible for processing your Data?

The Data Controller for your Data on the website www.pathehome.com and the Pathé Home Mobile Application is Pathé Home (Société par action simplifiée, RCS Paris 508 965 860), whose registered office is located at 1 Rue Meyerbeer, 75009 – Paris (France).

The Data Controller for your Data on the website www.pathe.fr and the Pathé France Mobile Application is Pathé Cinémas Services (Société en Nom Collectif, RCS Paris 392 706 412), whose registered office is located at 1 Rue Meyerbeer, 75009 – Paris (France).

For the provision of certain services, Pathé Cinémas France, Pathé CinéCartes, and Pathé Cinépass, as mentioned in Article 1 above, jointly assume responsibility for data processing carried out by Pathé Home or Pathé Cinémas Services. Similarly, Pathé Home and Pathé Cinémas Services jointly assume responsibility for the data processing they each implement.

The general outlines of our agreement concerning the sharing of personal data between the entities of the Pathé group can be made available to you upon request (see the "Contact Us" section).

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 create your Pathé account using your Facebook®, Google®, or Apple® account on the Websites or Applications:** your title, first and last name, email address, notification preferences for receiving commercial offers, as well as your date of birth (optional).
- **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 connection logs, technical information about your browser and device, as well as browsing data. Your email used to access the Pathé account is reused to ensure enhanced authentication of your data (MFA).
- **When you make a reservation or purchase online or in cinema:**
 - o **If you make the booking using your Pathé account:** the selected movie, payment method (credit card, prepaid card, or any other means of payment such as Kadéos gift card or holiday vouchers), your credit card token (to manage the payment and possible refund, and if applicable, to facilitate future purchases if you expressly consent), transactional information, and where applicable, your first name, last name, the email address to which your invoice is sent, your loyalty card and/or subscription number, and where applicable : Kadéos gift card number or holiday voucher number.
 - o **If you make the booking as a guest checkout:** first name, last name, email, payment data, transactional data.
- **When you make a booking or purchase at a cinema kiosk:** the movie, the selected screening, the relevant cinema, your payment method (credit card, CinéCartes, CinéPass, or any other payment method), and transactional information.
- **When you contact our customer service:** your first name, last name, email address (if applicable, linked to your Pathé account if you are logged in), your phone number, information regarding your request, and any attached documents related to your inquiry. We retain the history of our exchanges in order to process your request.
- **When you interact with our chatbot (an AI):** the chatbot has access to all your customer data provided when creating a Pathé account (see above). Additionally, we also collect the history of exchanges with the chatbot.
- **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 purchase foods and beverages

- At a cinema, at a traditional checkout or self-service counter: your payment method, transactional information, and, if you log into your Pathé account or use your CinéPass card to benefit from personalized offers: your first and last name, your account or CinéPass card number, and your purchase history.
 - At a cinema via a connected refrigerator: the personal data of cardholders is collected, including: identification data of the cardholder (such as name, address), card data (e.g., card number/PAN, expiration date, card type, card issuer), transaction information (e.g., transaction date/time/amount/currency, authorization code, transaction identification number), account data (e.g., bank account number, issuer), and device information (e.g., IP address, device identification number).
- **When you wish to gift a prepaid ticket on your Pathé account:** the recipient's email address.
 - **When you purchase a gift card:** your email address, payment information, name, surname, phone number, delivery address (if applicable), billing address, and account number (if applicable).
 - **When you make a group booking for tickets:** the email addresses of your guests.
 - **When you subscribe to a CinéPass membership:** your title, name, surname, date of birth, email address, full postal address, phone number, payment information (bank account details/RIB/IBAN and/or credit card), your photo ID, and a copy of your ID card if you are under 26 years old; the title, name, surname, full postal address, phone number, and payment information (bank details or RIB/IBAN) of the payer; the title, name, surname, full postal address, phone number, payment information (bank details or RIB/IBAN), and a copy of the legal representative's ID for minors and persons under guardianship.
 - **When you benefit from a CinéPass and want to access one of our partner cinemas:** your CinéPass subscription number, customer ID number, subscription status, subscription plan, name and surname, date of birth, and your photo are shared with the partner cinema.
 - **When you gift a CinéPass voucher:** the recipient's name, surname, and email address.
 - **When you purchase a fixed-term CinéPass subscription or a prepaid card through our network of resellers** (distributors, works councils, etc.) delivered in electronic format: your name, surname, and email address are collected by the reseller for this purpose.
 - **When you consent to receive promotional offers** via email (registration for Pathé marketing emails at a booking kiosk, on our website, or when creating/using your account): your email address.
 - **When you use the concierge service at Pathé Palace:** your name, surname, and phone number.

- **When you are subject to a ban from cinema access or fraud involving CinéPass:** the name and surname of the offender, ICU number, email address, postal address, description of the disputed incident, and testimonies. These details are logged in a blacklist.
- **When you visit our headquarters:** we collect the visitor's name, surname, company name, and visit time.
- **When you leave a review for a film you watched** (in cinema or on Pathé Home): we collect your email, first name, city, and review in our Qualifio tool. If your review is selected by our team and after obtaining your consent, your review may be anonymously published in our newsletter, displaying only your first name, city, and review.
- **When you leave a review about the cinema and your experience at a Pathé theater:** we collect in our tool: CRM ID, Google ID, name, surname, phone number, email, date the email was received, the visited cinema, and the spectator's feedback.
- **When you connect to the public WiFi at Pathé cinemas:** we collect your IP address provided/assigned by Pathé, your MAC address (phone/tablet identification address), the device name / person's name (e.g., "iPhone Damien Pro").
- **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 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:
 - o ensure the safety of people and property in cinemas, especially in 4dx rooms.
 - o 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:

- **Management of 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...);
- **Ensure enhanced authentication (MFA)** to protect the personal data collected on the Pathé account;
- **Reminder of your cinema session time via notification push**, only if you have consented to the "session reminder" feature in the application settings;
- **Improving the Websites and Mobile Apps** and your navigation;
- **Purchasing** or booking cinema tickets or VoD movies;
- **Managing customer service** requests;
- Enriching the customer/prospect database through **contests**;
- **Purchasing** foods and beverages;
- **Purchasing** tickets and prepaid cards;
- **Management of your CinéPass** subscription contracts;
- **Management of your CinéPass** reservations for screenings in our partner cinemas;
- **Management of payments** related to connected refrigerators in cinemas;
- Distribution of CinéPass subscriptions and dematerialized **prepaid cards** by our resellers;
- **Sending personalized information** and offers via email (movie recommendations you may like based on your Pathé account, our promotional offers including exclusive offers negotiated with our partners);
- **Protection of people** and property in cinemas as part of the entrance restriction procedure and video surveillance;
- **Fraud prevention and payment incident management**, within the framework of the CinéPass fraudsters management procedure;
- **Reception of visitors** and organization of meetings;
- **Conducting statistical studies** to better meet your expectations;
- Promotion of our services, when publishing **spectator reviews**;
- **Providing public wifi access** to Pathé cinema attendees;
- **Aggregation of personal data** from Pathé Cinémas Services clients, collected in our CRM.

Furthermore, we may retain and process your Data to ensure the defense of 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 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:

- Upon acceptance of cookies and web browsing trackers (see section 8: Cookies and Similar Technologies) ;
- When purchasing or renting a cinema ticket, a VoF movie or a prepaid card, if you choose to save your credit card information ;
- When using geolocation to find the cinemas closest to your location ;
- When activating certain features in the settings of your Pathé account on the Mobile Application (e.g. notification push, theater reminder etc) ;
- When we offer you personalized services or promotional campaigns ;
- When we do paid media on partnered social media ;
- During a transaction, and unless you object, we may offer you similar services ;
- When publishing your review about a movie you have written ;
- During the collection of your feedback regarding the cinema and the Pathé experience ;
- When connecting to public WiFi in Pathé 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
Enhanced authentication during access to the customer account	Legitimate interest	5 minutes
Web tracking analysis (cf. section 8)	Consent	13 months
Purchase or renting of VoD movies	Contract	3 years from the purchase

Purchase of cinema ticket through a Pathé account	Contract	3 years from the account inactivity
Purchase of cinema tickets through guest checkout process		24 hours from the screening unless you opt-in
Purchase of cinema tickets through a cinema kiosk	Contract	24 hours from the screening
Purchase prepaid cards online	Contract	3 years from the last purchase (Retention of Credit Card Data: 13 months)
Purchase of food and beverage through your Pathé account	Contract	3 years from the account inactivity
Management of customer service requests included AI chatbot claims	Contract or Legitimate interest following the request	Duration necessary to resolve the request and 1 year in the active database after the date of the complaint
Organization of promotional operations such as contests, particularly through social networks	Contract	6 months after the end of the promotional operation
Purchase via a connected refrigerator	Contract	10 years from the transaction
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 CinéPass subscription	Consent	Until the withdrawal of consent or 3 years from the end of the subscription
Purchase of cinema tickets through partnered theaters	Contract	13 months from the collection of the data
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
Geolocation of Pathé cinemas around you	Consent	N/A: no sending of GPS coordinates to Pathé, no collection of GPS coordinates via the server
Paid Media on social media	Consent	3 years from the last contact

Securing people and property (procedure for restricting access to cinema theaters)	Legitimate interest	- Up to 2 years if the CinéPass is terminated - 1 to 6 months maximum for restriction of access to a single cinema - Up to 1 year maximum for restriction of access to multiple cinemas
Securing and Protecting Cinemas (Video Surveillance)	Legitimate interest	1 month or, in case of legal proceedings, for the duration of the proceedings
Reception of visitors and organization of meetings by our reception staff at the headquarters (Pathé Palace and Pathé Wepler)	Legitimate interest	3 months after the visit Pathé may retain visitor data in case of an investigation related to fraud for the duration necessary to carry out the investigation.
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
Promotion of films through the publication of customer reviews	Consent	6 months from the publication of the review, before anonymization
Improvement of Pathé cinemas and experiences through the collection of customer reviews	Consent	1 years after receiving the review
Provision of Wi-Fi in Our Cinemas	Consent	6 months after the collection of the mobile number
Aggregation of personal data from Pathé Cinémas Services customers	Legitimate interest	Data is aggregated for a maximum of 3 years from the date of collection

8. Cookies and similar technologies

Pathe uses cookies and trackers on the Pathe.fr and Pathehome.com Websites and Mobile Apps. This use involves the processing of personal data. To find out more, please consult the

Cookie Policy, available in the footer of the website >> Personal Data Protection Charter >> Cookie Policy.

9. Who do we share your Data with ?

We share your Data with:

- Our internal teams who need to know.
- Our subprocessors 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 the European Union.

Part of your Data is transferred to service providers located outside the European Economic Area. In such cases, we have ensured that these providers offer sufficient safeguards for the transfers (including the signature of the European Commission's standard contractual clauses or certification under the Data Privacy Framework).

Here is the list of providers located outside the EEU :

Security and audience analysis :

- Akamai Technologies : processor located in the USA, and certified under the Data Privacy Framework.
- Google ReCaptcha : processor located in the USA, and certified under the Data Privacy Framework.
- Google Analytics : processor located in the USA, and certified under the Data Privacy Framework.
- Auth0 : processor located in the USA, and certified under the Data Privacy Framework.
- Elastic : processor located in the USA, and certified under the Data Privacy Framework.

Customer relationship management and commercial profiling

- Salesforce Service Cloud : processor located in the USA, and certified under the Data Privacy Framework.
- Salesforce Marketing Cloud : processor located in the USA, and certified under the Data Privacy Framework.
- Airship : processor located in the USA, and certified under the Data Privacy Framework.

- Tableau Software LLC : processor located in the USA, and certified under the Data Privacy Framework.
- Validity : processor located in the USA, and certified under the Data Privacy Framework.
- Sprinklr : processor located in the USA, and certified under the Data Privacy Framework.

Payment / ticketing / electronic payment

- Vista Group : processor located in the New-Zeland, and certified under the Data Privacy Framework.

Targeted advertising

- Youtube : processor located in the USA, and certified under the Data Privacy Framework.
- Dailymotion : processor located in the USA, and certified under the Data Privacy Framework.
- Facebook/Meta : processor located in the USA, and certified under the Data Privacy Framework.
- Instagram : processor located in the USA, and certified under the Data Privacy Framework.
- TikTok : processor located in China, transfers are valid under SCCs and BCR.
- Pinterest : processor located in the USA, and certified under the Data Privacy Framework.
- Snap Inc : processor located in the USA, and certified under the Data Privacy Framework.
- Google Advertising Products : processor located in the USA, and certified under the Data Privacy Framework.

To learn more about these features and the privacy policies of our partners, we invite you to consult the links listed in Section 8 of the Charter.

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.

To enhance the security of your Pathé account and protect your personal data, we use multi-factor authentication (MFA). This involves collecting your email and sending a code to validate your identity when accessing our services.

Access to your Data is strictly controlled and reserved for employees of Pathé Home and Pathé Cinémas, 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.

Furthermore, regarding the mobile phone number, Pathé emphasizes that it does not engage in

any telemarketing via SMS, voice calls, or any other means on the client's mobile phone. That said, we remind you that you can register free of charge on an opt-out list called "Bloctel" at www.bloctel.gouv.fr to no longer be solicited by professionals over the phone.

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 Home or Pathé Cinémas Services ;
- Request the deletion of your account and all your Data held by Pathé Home or Pathé Cinémas Services.

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@pathe.fr for requests that cannot be made on your Pathé account or via the contact form
- By post at the following address: **DPO PATHE, 1 rue Meyerbeer 75009 Paris (France)**. 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. Data Protection Officer

We have appointed a Data Protection Officer (DPO) who can be reached at the email address dpo@pathe.fr.

14. Submitting a complaint to the Data Protection Authority

If you believe that we have not processed your Data in accordance with personal data protection regulations, you can file a complaint with the CNIL: <https://www.cnil.fr/en/plaintes>.