



## **PERSONAL DATA PROTECTION CHARTER (PATHE.COM)**

Pathé (hereinafter “We” or “Pathé”) wishes to provide Users with a clear explanation of the processing of their personal data (your “Data”) and their rights under the applicable laws in this area.

This charter (the “Charter”) applies to all services Pathé offers on the [www.pathe.com](http://www.pathe.com) website (the “Site”).

We may amend the Charter by updating this page. Therefore, we invite you to refer to it regularly to ensure that you agree with any changes.

We will consider that you have accepted this Charter by using our services or browsing the Site.

If you have any questions concerning the Charter, you can contact us on our Site via the contact form or by post at Service Communication Pathé, 2 rue Lamennais, 75008 Paris.

### **Table of contents**

- 1. Who are we?**
- 2. Who is the data controller responsible for your Data?**
- 3. What types of Data do we collect?**
- 4. Why do we process your Data / for what purposes do we process your Data?**
- 5. Are you required to provide us with your Data?**
- 6. How do we obtain your consent?**
- 7. For how long do we keep your Data?**
- 8. Cookies**
- 9. Who are the recipients of your Data?**
- 10. With whom do we share your Data?**
- 11. To which country(ies) do we transfer your Data?**
- 12. What measures are implemented to ensure the security of your Data?**
- 13. What are your rights and how can you exercise them?**
  - 13.1 Your rights**
  - 13.2 How to exercise your rights**
- 14. Submitting a complaint to the CNIL**

The Charter in brief:

<p style="text-align: center;"><b>Data collected</b></p> <p>When you use the contact form, we collect your first name, last name and email address, if you agree to provide them.</p> <p>While you browse, we collect your IP address.</p> <p>We collect your personal data such as your first and last name, telephone number, email address and/or postal address when you send us your CV, a script or any other document containing personal data (i.e. any information about a natural person who is identified or identifiable, directly or indirectly, by reference to an identification number or to one or more factors specific to such person).</p>	<p style="text-align: center;"><b>What we do with your data</b></p> <p>Collecting your data via the contact form enables us to answer your questions and send you documents.</p> <p>Collecting your IP address enables us to generate statistics on the use of the Site and visits to the various sections of the Site.</p> <p>Collecting your first and last name, telephone number, email address and postal address, as indicated on your CV, a script or any other document that you send us, enables us to contact you to discuss the documents submitted.</p>
<p style="text-align: center;"><b>Data recipients</b></p> <p>Your data is provided to various Pathé departments depending on the nature of your request (Human Resources, Production, Video, Programming, Marketing, Communication).</p>	<p style="text-align: center;"><b>Location of your data and transfers</b></p> <p>We keep your data that we collect on the <a href="http://www.pathe.com">www.pathe.com</a> site in the European Union.</p> <p>The IT infrastructure on which the <a href="http://www.pathe.com">www.pathe.com</a> website is hosted is maintained in France and outside the European Union by one of our service providers.</p> <p>We use Google Analytics. For more information about the hosting and transfer of your personal data, please refer to Google's policy: <a href="https://support.google.com/analytics/answer/6004245?hl=fr">https://support.google.com/analytics/answer/6004245?hl=fr</a>.</p>
<p style="text-align: center;"><b>Configuring your options</b></p> <p>You can configure your consents at any time in the "Configure your Cookies" section of our <a href="http://www.pathe.com">www.pathe.com</a> website.</p>	<p style="text-align: center;"><b>How to contact us</b></p> <p>If you have any questions concerning the Charter, you can contact us via the contact form or by post at <b>Service Communication Pathé</b>, 2 rue Lamennais, 75008 Paris, France.</p>

**1. Who are we?**

Pathé is a French company and a leader in the European film industry, whose business covers film production and distribution and the operation of cinemas.

Pathé SAS publishes and manages the [www.pathe.com](http://www.pathe.com) website.

**2. Who is the data controller responsible for your Data?**

The data controller responsible for your Data is Pathé SAS, a French *société par actions simplifiée* (simplified limited company) with share capital of €20,587.515.25, registered in the Paris Trade and Companies Register under number 307 582 866, which has its registered office at 2 rue Lamennais, 75008 Paris.

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

We collect various types of information about you:

- Automatically when you access the Site: your IP address, technical information about your browser and terminal, as well as browsing Data;
- When you contact our departments via the contact form available online on our Site: your first and last name, email address and information concerning your request, as well as any related attachments (CV, script, images, etc.), which may also contain your postal address or telephone number. We keep the Data concerning the history of our exchanges in order to respond thereto more efficiently.

### **4. Why do we process your Data and for what purpose(s)?**

We use and process your Data for several reasons:

- To manage requests you submit via the contact form to the various Pathé departments concerned;
- To carry out statistical studies, in particular to better meet your expectations;
- To improve the Site and your browsing experience.

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

No legal obligation requires you to provide us with information about yourself. However, we will be unable to respond to your request if you do not provide us with the information described as mandatory on our contact form.

You are free to provide us with Data described as optional. Collecting such Data enables us to improve the Site and your browsing experience on the Site.

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

We will only collect, process and use your Data after having obtained your clear, explicit and unequivocal consent.

We obtain your consent in the following ways:

- when you accept web browser cookies in accordance with Section 8 of this Charter;
- when you use the contact form.

### **7. For how long do we keep your Data?**

Your Data will be kept for the time necessary to respond to your requests or for the time required to manage the service(s) offered on the Site. We ensure that the retention period is reasonable given the purpose for which the Data is collected.

If you submit an application for employment via the Site's contact form, even if you are not hired, we may keep your data on file for a maximum of twelve (12) months following your submission and we may call you if another opportunity corresponding to your qualifications arises. If you choose not to be contacted if future opportunities arise, your data will be kept for a maximum of twelve (12) months. If necessary, we may keep your data in our archives for a longer period in order to comply with applicable limitation periods in the event of a claim in relation to the recruitment process.

Cookies managed by Pathé are retained for up to thirteen months.

Pathé complies with the retention periods imposed by applicable statutes and regulations. If your data is no longer required to provide a service, your data will be deleted or archived in anonymised or pseudonymised form in order to comply with applicable laws.

**8. Cookies**

When you visit our Site, cookies may be installed and read in the browser of your computer or terminal.

These cookies enable us to collect Data in order to:

- allow browsing activity on our Site;
- track your browsing activity and measure the Site’s audience.

These cookies are stored for a maximum period of 13 (thirteen) months from the time they are installed on your browser or terminal. At the end of this period, fresh consent will be required. You can at any time manually delete these cookies, or you can object to the installation of cookies by configuring your web browser or terminal accordingly as described below, or by clicking on the “Configure your Cookies” tab on the Site. Such settings may disrupt Users’ browsing on the Site and the use of certain services.

Party responsible	Name of cookie	Type	Retention period	Use
Sweet Punk	pll_language	text string	12 months	Sets the language of the site in order to maintain consistency throughout Users’ browsing activity.
Sweet Punk	%rotate_screen	numerical value	12 months	Defines that the user has closed a popup (rotate screen) so that it is not displayed again.
Sweet Punk	tarteaucitron	string representing a table of services accepted	12 months	Authorises access to the various services required by the site and to browse the site (currently only Google Analytics).
Google Analytics	_ga	text string	12 months	Statistical information from Google Analytics that monitors site traffic (conditioned by tarteaucitron).
Google Analytics	_gid (Google Analytics)	text string	24 hours	Static information from Google Analytics that monitors site traffic (conditioned by tarteaucitron).

Vimeo	vuid	text string	12 months	Static settings for playing videos from Vimeo.
Vimeo	player	text string	2 years	Static settings for playing videos from Vimeo.
YouTube	There are many. I've created a separate table, which is presented below.	various	various	Static settings for playing videos from YouTube.

Cookies are installed either directly by us or by third parties, depending on choices you have previously made on sites managed by third parties.

**YouTube cookies (valid at 23 September 2020):**

__Secure-3PSIDCC	.youtube.com	/	2021-09-23T07:09:18.650Z
SIDCC	.youtube.com	/	2021-09-23T07:09:18.650Z
SID	.youtube.com	/	2022-09-14T17:42:31.981Z
__Secure-3PAPISID	.youtube.com	/	2022-07-16T11:46:25.806Z
SAPISID	.youtube.com	/	2022-07-16T11:46:25.806Z
__Secure-3PSID	.youtube.com	/	2022-09-14T17:42:31.981Z
APISID	.youtube.com	/	2022-07-16T11:46:25.806Z
SSID	.youtube.com	/	2022-07-16T11:46:25.806Z
HSID	.youtube.com	/	2022-07-16T11:46:25.806Z
YSC	.youtube.com	/	Session
CONSENT	.youtube.com	/	2038-01-10T07:59:59.806Z
s_gl	.youtube.com	/	Session
LOGIN_INFO	.youtube.com	/	2022-07-03T11:10:30.162Z
VISITOR_INFO1_LIVE	.youtube.com	/	2021-03-20T11:24:11.261Z
PREF	.youtube.com	/	2022-07-17T08:15:10.000Z

To learn more about these cookies and how you can disable them, please refer to:

- Google Analytics: <https://tools.google.com/dlpage/gaoptout?hl=fr>

We inform you that you can also manage cookies by configuring your browser:

- Internet Explorer™: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>
- Safari™: [https://support.apple.com/kb/ph21411?locale=fr\\_CA](https://support.apple.com/kb/ph21411?locale=fr_CA)
- Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>
- Firefox™: <http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>
- Opera™: <https://help.opera.com/en/latest/web-preferences/#cookies>
- Edge: <https://support.microsoft.com/fr-fr/help/4468242/microsoft-edge-browsing-data-and-privacy>
- Vimeo: (1) cookies: [https://vimeo.com/cookie\\_policy](https://vimeo.com/cookie_policy), (2) personal data: [https://vimeo.com/privacy#data we collect about you](https://vimeo.com/privacy#data_we_collect_about_you)

To perform this configuration on your mobile or tablet, please follow the links below:

- iOS: <https://support.apple.com/fr-fr/HT201265>
- Android: [http://www.wikihow.com/Disable-Cookies#Android\\_Devices](http://www.wikihow.com/Disable-Cookies#Android_Devices)

#### **9. Who are the recipients of your Data?**

Pathé SAS or other Pathé entities (such as Pathé Films, Les Cinémas Pathé Gaumont, Pathé Production Ltd, Pathé Films AG, Pathé Belgique, Pathé Theatres BV, Pathé Schweiz AG, Pathé Live and the Jérôme Seydoux-Pathé Foundation) are the recipients of your Data, in their capacity as data controller(s), depending on the nature of your request or the entity you wish to contact.

#### **10. With whom do we share your Data?**

We ensure that our subcontractors offer sufficient guarantees to properly implement the security and confidentiality measures for the Data to which they have access in the performance of their duties, as defined by the applicable laws in this area.

We share your Data with outside service providers who help us manage the services we offer you, including for viewing Vimeo's videos, Site maintenance, security, IT support and Site hosting. The actions of each of these external service providers is strictly limited to the service they perform on our behalf and complies with laws in force.

#### **11. To which country(ies) do we transfer your Data?**

We keep your Data in the European Union.

Site maintenance is provided in and from France.

Some of our service providers may have access to your Data in connection with Google Analytics and in connection with the maintenance of the infrastructures that host the Site. In such case, some of your Data may be transferred outside the European Union for statistical and maintenance purposes by our service providers.

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

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

Access to your Data is strictly controlled and is restricted to Pathé employees authorised to process User requests via the contact form, to the Human Resources Department and recruitment managers if you send a CV to submit an application for employment, to employees in charge of the Production Department if you submit a script, and to employees in charge of Site management.

In accordance with applicable laws, Pathé implements physical and electronic backup procedures for Data collected on the Site.

We draw your attention to the fact that Pathé does not control the risks associated with the functioning of the internet, in particular the occurrence of specific events that may result in the loss of Data or a breach of the confidentiality of Data that transits through the Site.

Pathé shall not be liable if access to the Site is interrupted due to a force majeure event or reasons beyond its control.

Any breach of the security and/or confidentiality of your Data will be reported to you and to the French Data Protection Agency (CNIL) as soon as possible, whenever required by applicable laws.

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

#### **13.1 Your rights**

As a data subject you have a right to access your Data, a right to have your Data corrected if it is inaccurate, a right to have your Data deleted, a right to object to and restrict the processing of your Data, and a right to portability of your Data, i.e. the right to receive the Data that you have provided us in a structured, commonly used and computer-readable format and to transmit it to another data controller.

#### **13.2 How to exercise your rights**

You can also configure your consents at any time in the “Configure your Cookies” section.

For any other request, you can contact us:

- Via the [contact form](#) on our Site;
- By post at: Service Communications Pathé, 2 rue Lamennais, 75008 Paris.

In order to process your request efficiently, please provide us with your first and last name, email address and any other information necessary to confirm your identity and enable us to process your request. You will also need to specify in your request whether you wish to receive a response by post or electronically. If you do not state a choice, we will reply to you electronically.

We will reply to you as soon as possible and, in any case, within one month from receipt of your request. This period may be extended by a further period of one month depending on the request.

### **14. Submitting a complaint to the CNIL**

If you have a claim, you may contact the French Data Protection Authority (CNIL), which is the competent personal data protection authority:

- by post at 3 place de Fontenoy, 75007 Paris;
- by telephone at 01 53 73 22 22; or
- you may file a complaint with the CNIL via the <https://www.cnil.fr/fr/plaintes> website.