# **RE:VOIR ONLINE Privacy Policy**

This Privacy Policy explains our practices, including your choices, regarding the collection, use, and disclosure of certain information, including your personal information, by RE:VOIR SARL. ("RE:VOIR ONLINE") in the course of our provision of the RE:VOIR ONLINE services (the "Services").

## 1. Contacting Us

If you have general questions about your account, please contact customer service at support@re-voir.com. For questions specifically about this Privacy Statement, or our use of your personal information, cookies or similar technologies, please contact our Data Protection Office by email at privacy@re-voir.com.

Please note that if you contact us for assistance, we may need to authenticate your identity before fulfilling your request, for your safety and our own.

## **2** Collecting Information

In order to process your registration, membership, trial, subscription(s), or other use of the Services, it is necessary to collect, receive, and/or store personal data from you. This includes, but is not limited to:(i) Information provided by you: We collect information you provide to us which may include, but is not limited to, your name and email address. We may also collect information when you choose to provide ratings, make lists, write reviews, or otherwise create content or interact with the Services; (ii) Information collected automatically: We collect information about your use of our service, including, but not limited to, the films you have watched, and details of your interactions with our customer service, such as the date, time and reason for contacting us.

## 3. Using Information

We may use your information for the following purposes:(i) Service Access and Registration: to register you as a member, when you purchase or renew a subscription, sign up for an online or IRL event. We also may determine your general geographic location, provide localized content, provide you with customized and personalized viewing recommendations for content you have expressed an interest in or that we think will be of interest to you.(ii) Sales and Fulfilment: to process and deliver your order; to manage payments, fees and charges; to collect and recover money owed to us; to provide you with services you have requested from us or signed up for when we collected the information from you.(iii) Customer Relationship Management: to contact you about your Account, subscription or other order; to provide you with customer service (such as responding to questions, concerns and feedback and contacting you via email); to notify you of material changes to our terms or this Privacy Policy; to send you service related communications; to ask you to leave a review or take a survey.(iv) Business Administration, Systems and Security: to administer and protect our business and our sites such as integration, troubleshooting, testing, system maintenance, support, reporting and hosting data; to ensure network and system security and prevent, detect, mitigate and investigate fraud, security breaches and other prohibited or illegal activities; to verify your identity; and to enforce our Terms & Conditions (such as determining whether and for which RE: VOIR ONLINE signup offers you are eligible and

determining whether a particular device is permitted to use the account consistent with our Terms & Conditions).(vi) Data Analytics: to measure the performance of our marketing campaigns (for example, analyzing open and click rates); to provide insight and analysis of our customers for ourselves and our business partners. Where we have the appropriate permissions or as otherwise authorized by applicable law, we will use your information to market and advertise our products and services. You can always tell us that you wish to stop receiving direct marketing communications from us.

#### 4. Disclosing Information

We do not share your personal data with any service providers, third parties, analytics or search engine providers. We reserve the right to disclose your personal data in order to comply with the law, applicable regulations and government requests, or to detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues. We also reserve the right to use such information to protect against harm to the rights, property or safety of RE:VOIR ONLINE, our operating systems, integrity, users or the public, as required or permitted by law. Whenever in the course of sharing information we transfer personal information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection.

### **5. Accessing Information**

You have certain rights in relation to the personal data we hold about you, which we detail below. Certain rights only apply in specific circumstances as set out in more detail below. We also set out how to exercise those rights. When you exercise your rights, we need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We will also contact you to ask you for further information in relation to your request to speed up our response. Your rights include the right to:(i) Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. (ii) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we need to verify the accuracy of the new data you provide to us. (iii) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we could have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we are not always able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. (iv) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes (more information on your marketing choices can be found in the Marketing section above). In certain cases, we will demonstrate

that we have compelling legitimate grounds to process your information which override your rights and freedoms. (v) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.(vi) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.(vii) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

### 6. Retaining Information

We retain your personal information for as long as is necessary to carry out the purposes set out in this Privacy Policy, unless a longer retention period is required by applicable law or is necessary for us to protect our rights. We keep your personal information for as long you maintain a RE:VOIR ONLINE account or subscription. When your account has been deleted or your subscription is over, we may retain certain personal information for purposes such as complying with our legal obligations, resolving disputes, preventing fraud or misuse of promotions, and protecting our rights and interests. We may be legally obligated, for example by tax and sales laws, to retain personal information related to product or subscription purchases for a period of time specified by law.

## 7. Security

We use reasonable technical, administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information.

### 8. Other Websites, Platforms and Applications

The RE:VOIR ONLINE Services may be provided through and/or utilize features (such as voice controls) operated by third party platforms, or contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. For example, you may be able to access the RE:VOIR ONLINE Services through platforms such as gaming systems, smart TVs, mobile devices, set top boxes and a number of other Internet connected devices. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third party applications that interact with the RE:VOIR ONLINE Services.

### 9. Cookies, Web Beacons, and other Technologies

We do not use cookies, web beacons or other similar technologies on our applications and communications.

### 10. Children

You must be 18 years of age or older to subscribe to the RE:VOIR ONLINE service or have a RE:VOIR ONLINE membership. In certain jurisdictions, the age of majority may be older than 18, in which case, you must satisfy that age in order to become a subscriber. While individuals under the age of 18 may utilize the Services, they may do so only with the involvement, supervision, and approval of a parent or legal guardian.

### 11. Changes to This Privacy Policy

We will update this Privacy Policy from time to time in response to changing legal, regulatory or operational requirements. We will provide notice of any such changes (including when they will take effect) in accordance with law. Your continued use of the RE:VOIR ONLINE Services after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes. If you do not wish to acknowledge or accept any updates to this Privacy Policy, you may cancel your use of the RE:VOIR ONLINE Services and delete your account.

You may access the previous version of this Privacy Policy by writing to us at support@revoir.com or through the contact details in Section 1 above. This policy was updated on 15 April 2021.