

Welcome to our privacy notice for business customers.

- **About this privacy notice and how we use your personal information**

This privacy notice explains how we collect and use personal information, under data protection laws, when you are interacting with us as a business customer or vendor, or a delegate of a business customer.

For the purposes of the data protection laws, the ODEON Cinemas Group company which you are interacting with, is referred to in this privacy notice as the '**ODEON Company**' or '**we**' or '**us**' or '**our**' (with our contact details being as shown on that ODEON company's website).

We will be processing the following personal information (as applicable to your situation):

- the personal information of the relevant account manager, business contact or procurement manager at your business (**Account Manager PI**)
- the personal information of certain delegates who will be attending meetings at our offices, or conferences or meetings at which we are a corporate attendee (**Conference PI**)
- the personal information of delegates who will be attending business events at our premises as part of an event hire arrangement, where such event hire has been organised by your organisation or a third party (**Delegate PI**)

When we are processing personal information in connection with this privacy notice, we are processing it as follows:

- as a controller in respect of Account Manager PI or Conference PI – that's what this privacy notice deals with
- as a processor in respect of Delegate PI – we refer you to your controller's privacy notice for more information about their processing activities, as well as any activities which they are asking us to undertake, as we are simply following their directions in respect of processing Delegate PI.

The rest of this privacy notice therefore deals with the processing of Account Manager PI or Conference PI, each of which we refer to in this privacy notice, as "**Personal Information**".

- **Our data protection officer**

Every territory has a data protection officer (DPO) – their contact details are shown on the respective ODEON Company's website. They are responsible for overseeing everything relating to this privacy notice. Our DPO for the ODEON UK group companies can be contacted by email: dpo@odeonuk.com

- **How we'll use Personal Information**

We follow these simple principles for all Personal Information:

- we'll tell you how we're going to use Personal information, either when we collect it, or via our policies, contracts and other notifications
- we'll only use it for those reasons or purposes
- we'll only capture, use, share and keep the minimum information we need
- we'll keep it accurate and up to date – we'll build in checking processes, but we may also need your help
- we'll keep Personal Information secure

- **Who we share it with**

We may share Personal Information where necessary, and we'll do this safely and securely. This could be internally with teams that your arrangements or communications relate to, as well as other members of staff or the ODEON Cinemas Group, where we feel that this is reasonable and necessary to do so.

We will not share Personal Information with any third parties outside the ODEON Cinemas Group for the purposes of direct marketing.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with Personal Information unless we have instructed them to do it. They will not share Personal Information with any organisation to the extent that it

is not related to the provision of our services to you. They will hold it securely and retain it for the period we instruct.

In any other scenarios, we'll satisfy ourselves that we have a lawful basis on which to share the Personal Information, document our decision making, and satisfy ourselves that we have a permitted reason for which to share the Personal Information.

- **Sharing internationally**

To the extent that it is relevant to your dealings with us, we may share Personal Information with people or businesses outside the UK and European Economic Area. We'll make sure Personal Information is secure and safeguarded appropriately. Further details are available from our DPO.

- **Cookies and Links to other websites**

We use cookies on our business customer and business vendor related websites. Further information on such cookies is shown in our <https://www.odeonevents.co.uk/cookie-policy/>

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes Personal Information. We encourage you to read the privacy notices on the other websites you visit.

- **How long we'll keep your data**

We will only keep Personal Information for as long as we need to, for the purposes we collected it for, and to meet any legal, accounting, business or reporting requirements. In some circumstances, we may anonymise Personal Information, so that it is unidentifiable, so that we can continue to use it. As soon as we no longer need Personal Information, we will securely delete or destroy it.

More information is available in the appendix and from our DPO.

- **Your rights**

You can do any of the following in terms of your Personal Information, in certain circumstances:

- ask to see it
- ask us to correct it
- ask us to delete it
- ask us not to process it
- ask us to restrict its use
- ask us to give you or someone else your Personal Information in a portable format
- change your mind at any time and refuse permission, where we're relying on your consent to use your Personal Information

We act with trust & respect in all your requests in respect of the above, and will carry them out as soon as we can. If your request seems excessive or unreasonable, we may need to charge a fee to cover the work involved or we may not agree to your request.

If you're unhappy with our use of your Personal Information or have any concerns, we hope that our DPO can work this through with you. However, at any time you can contact or make a complaint to the Information Commissioner's Office (ICO), the UK body for data protection issues. (www.ico.org.uk)

The ICO has provided some useful guidance to explain more about your above rights, so please feel free to consult its guidance for more information: <https://ico.org.uk/your-data-matters/>

- **Where and why we get your Personal Information**

Most of the Personal Information we use is provided to us directly by you, usually for one of the following reasons:

- You have made a complaint or enquiry to us
- You have made an information request to us
- You wish to organise event hire with us (including for conferences, private screenings and other bookings)
- You wish to purchase goods or services from us, or provide them to us or our customers
- You subscribe to our e-newsletter or e-mailshots or other communications
- You are representing your organisation, including when you meet with us
- You wish to use our Wi-Fi at our premises

- So that we can offer details of the ODEON Cinemas Group's goods and services to you, including when you have consented to such arrangements at conference events or exhibitions

We also receive Personal Information indirectly, in the following circumstances:

- Your organisation gives us your Personal Information for dealing with a complaint or enquiry
- An event organiser, business contact or one of our employees or contractors, provides us with your Personal Information, to suggest that we contact you
- A lead generator provides such Personal Information to us (where they have communicated to you, that they will be sharing such information with us), to allow us to offer goods and services to you, or to provide corporate tickets or gift cards to your workforce or organisation
- We sometimes collect additional information from other third parties (including business partners, networking websites, social media and other public websites), but only to the extent that it would be lawful for us to do so

We have included further details about the types of Personal Information which we use, and the reasons why we may use Personal Information, in the appendix.

We will also use certain Personal Information for any of the following reasons:

- for our legitimate interests in the course of our business (where your interests and rights don't override our business needs)
- where you've given us permission to use it

If we ask you for your consent to use your Personal Information (or someone asks for this on our behalf), you are free to give, refuse or withdraw it later if you choose to. It's fine for you to refuse or withdraw consent later and there won't be any negative consequences for you.

If you provide us with the personal information about third parties, you are confirming that you have their permission to do so, and that you have made them aware of this privacy notice, so that they know how their information is being used.

- **Some data you need to give us**

There will be some Personal Information you must give us, to meet certain legal and contractual requirements. Without such information, it could affect our ability to perform our contract; or meet our legal obligations. If any Personal Information we request is optional, we'll let you know that upfront.

- **General**

This privacy notice is not part of any contract between us and you, and we will update it from time to time. If you want more information or have any questions or concerns, please feel free to contact our DPO.

Appendix

ODEON venue hire for events (including conferences, private screenings and other bookings)

Our purpose for collecting your Account Manager PI for event hire at our premises, is so we can facilitate, and communicate with you, about the event, and provide your organisation with an acceptable service. Except as otherwise mentioned in this privacy notice, we rely on our legitimate interests for using your Account Manager PI for these purposes.

If you wish to book event hire, you will be asked to provide your contact information, your organisation's name, as well as the information requested in our customer application form and contract information pack for event hire.

If we proceed with the event hire request, we may request information about your delegates and any dietary requirements or access provisions your delegates may need. However, we will be processing such Delegate PI as your processor, as mentioned earlier in this privacy notice (so it is your organisation's responsibility as the controller, to communicate all relevant privacy notices and obtain all authorisations and consents from such delegates for the processing of their personal information).

We may share the Account Manager PI and Delegate PI with our staff who are organising and managing the event, as well as with our third party security, reception and catering organisations, for the purposes of providing the event, security, reception and catering services (where applicable). Where such third parties are acting as our processors, we will ask them to delete such information after the event.

We may also ask for payment for event hire, in which case we will use that information for performing our contract with you, and such payment details will be used by our payment processing company for taking the payment.

If you are not successful in securing a date for event hire, we'll let you know and hold your details on a reserve list in case a date becomes available, so that we can contact you accordingly.

Where we meet you at conference events or exhibitions

Where we wish to send you marketing communications, we will usually rely upon your consent (but please see the 'Marketing Communications' section below). This may be collected in writing from you or by scanning your event badge at conference events or exhibitions.

Marketing Communications

Where we send you marketing communications, these will be sent to you either:

- Where you have consented (such as for email marketing campaigns)

or

- Where we are allowed to for our legitimate interests to provide details about our goods and services and events to you (such as to contact you to discuss your interest in holding a business event at ODEON Cinema Group's sites, or potentially ordering gift cards for re-sale purposes)

For such purposes, we will usually use your name, email, other contact details, preferences and profile information which you have provided to us.

We may gather statistics around email opening and clicks using industry standard technologies, including clear gifs to help us monitor and improve our e-newsletter and communications.

We may use third party service providers to provide you with such communications on our behalf.

Gift Cards

With regard to gift cards, we are provided by our third party lead generator, with details of your Account Manager PI, including your name, address, organisation and other contact details, as well as the fact that you may be interested in receiving gift cards for your organisation for making available for sale (where this is applicable). As part of such discussions you may provide us with your preference and profile information.

In such circumstances, we use your Account Manager PI for our legitimate interests (except where stated otherwise below) to:

- contact you about your interest in gift cards
- take orders and deal with fulfilment of gift cards for contract fulfilment purposes
- monitor your procurement volumes of gift cards with us
- have account review meetings with you

We keep your Account Manager PI for 6 calendar years from the date of our last transaction with you.

Corporate Ticketing

We provide corporate ticketing services, whereby we offer tickets to businesses for use in their employee benefit schemes.

We use a third party lead generator to provide us with the details of the respective business name and address which wishes to purchase the respective corporate tickets.

We do not obtain any names of individuals at the respective business, as the procurement activity and the fulfilment is undertaken by the third party lead generator (which will be the controller of any personal

information which it obtains in respect of such procurement and fulfilment arrangements with the respective business).

We simply take the order for the number of tickets and provide those to our third party lead generator to fulfil to its end customer.

We receive reports from our third party lead generator of the number of tickets sold and the price which they have been sold for, but no personal information in respect of the recipient of the business (except where the business name and address constitute personal information in the context of partnerships or sole traders, in which case we process such information for our legitimate interests of sales insights information).

Enquiries and Complaints

Where you and us are communicating with each other, we will be using the Personal Information which you provide to us, and which we provide to you, for the purposes of the relevant communication, such as dealing with a complaint, enquiry or transaction.

We will also hold the names, roles and contact details of individuals acting in their capacity as representatives of their organisations, so that we can interact with them for our business purposes.

We will do the above for the above legitimate interests.

Visitors to our premises

CCTV and Visitor Logs

If you have a planned visit to our premises, we'll send your name and visit information to our reception team before your visit – so that you will be given a visitor badge on your arrival, and be directed to whom you are visiting at the premises. We ask all visitors to sign in and out at reception. Visitor attendance logs are kept for a period of at least 1 year and then deleted at the start of the next calendar year.

Closed-circuit television (CCTV) operates in our premises for security purposes. The information is viewed by us on a live feed and recorded and maintained for a rolling month's period.

The purpose for processing the above information is for security, safety and incident investigation and claim management reasons, and this is done for our legitimate interests.

Any external CCTV used at our premises, are not operated by us, so we are not the controllers. It will be under the control of the relevant building landlord.

WiFi

We have Wi-Fi on site at our offices for the use of visitors. You will be provided with the SSID and password for use of the Wi-Fi where requested.

We record the device's MAC address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent or received, for security purposes, and for checking against blacklisted websites. You accept that we have no responsibility or control over your use of the internet while you are on site, and we don't ask you to provide any of your other Personal Information to get this service, other than your device's MAC address.

The purpose for processing this Personal Information is to provide you with access to the internet whilst visiting our site, and the reason for this is our legitimate interests. This information is deleted on a rolling monthly basis.

Disability and Allergy, Health or Dietary Requirements Arrangements

We have a legal duty to comply with the Equality Act (2010). This means we need to make adjustments for anyone with a disability, to eliminate any barriers to access. So we have a legal obligation to do this.

If there is any other health, allergy information or dietary requirements, which you will be providing to us as part of the Personal Information, which are relevant to your visit, then we will need your consent for that.

We'll create a record of your adjustment requirements. These will give your name, contact details and type of adjustment required, along with a brief description of why it is required. Relevant staff (or our third party service providers) can access this to ensure they are communicating with you, making adjustments and providing services in the required way. This will be kept for the duration of your scheduled visits with us, and then deleted at the start of the next calendar year (where this is Personal Information).

How long we keep your Personal Information

Unless we say otherwise in this privacy notice, we keep your Personal Information for a period of up to 6 years following our last interaction with you, before we delete it at the start of the following calendar year.

However, in all cases, we may keep your Personal Information for longer periods, where we need to investigate an incident or deal with legal claims, in which case the information is retained until the resolution of that incident or legal claim.