

# Privacy Policy

Vue Entertainment is a controller of your personal data. We respect your data and your privacy is important to us.

This Privacy Policy explains what personal data we collect and how it is used. This policy also explains what rights you have over your personal data and how you can use those rights.

Vue Entertainment's registered office is 10 Chiswick Park, 566 Chiswick High Road, London W4 5XS.

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## 1. Summary of how we use your data and your rights

We use your data to provide and improve our products and services. This includes using it for customer service, marketing, research, feedback and enquiries, and for safety and security purposes.

We also use your data to comply with laws and regulations and to help prevent and detect crime, such as fraud.

You have the right to object to some of the processing Vue Entertainment carries out. More information about your rights and how to exercise these is set out in the "Your rights" section of this notice.

When you give consent to us to use your personal data, you are able to withdraw that consent at any time by emailing [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com). You can also email [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com) to exercise any other data rights, such as obtaining a copy of your data, correcting, deleting or restricting how we use your data. Please see "Your rights" for more information.

You can unsubscribe from marketing communications at any time. To opt out of marketing, including profiling for direct marketing purposes, you can either adjust the preference settings in your Vue account, or select "unsubscribe" in emails, or email [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com).

Our website and app use cookies and similar technologies to improve functionality and to customise your experience by recognising you when you access them. You can reject and block cookies in your browser settings. Please see our [Cookie Policy](#) for more information.

If you enable location services on the app, or you access the location finder on our website and your browser settings allow this, your device will identify and notify you of the nearest Vue Cinema to your location.

Vue Entertainment is part of the Vue International Group (Vue International Holdco Limited and its subsidiaries). Data is shared between members of the Vue International Group when they provide support, advisory, IT, safety and security, including CCTV, and other services to Vue Entertainment. For more details of the Vue International Group see "Data sharing".

## 2. Information we collect from you

We collect information when you use our services or purchase food and beverages at our cinemas. This includes visits to our cinemas, using our website or App, using LiveChat or corresponding with us.

In particular:

- We keep information you give us directly such as contact details (including name, email, address and telephone number), comments, date of birth, gender, region, frequency of visits, feedback, marketing opinions and competition entries.
- We record, analyse and store website and app visits, details of which marketing emails seem of interest to you, details of your purchases and occasions when you make use of our promotions.
- When you sign into Wi-fi networks at our cinemas and give your number to gain access Vue and the Wi-fi provider will check this number and keep a record of this.
- If you are involved in or witness an incident, we will need to log information about it.
- If you engage with us online via our websites or app, our cookies and similar technologies will capture your IP address, your location, and record how you use the site or app to help improve it and enhance your user experience (where your browser settings or permission allows for this).
- If you post information online about us or provide feedback, we will keep a record.
- If you contact us directly and complain or give feedback, receive compensation, or enter a competition, we will record details and all related information such as emails, letters and phone calls.
- We record static or moving imagery of customers and staff via CCTV systems in our cinemas for the prevention and detection of crime, for safety and security reasons and to support the effective management of our business operations by monitoring visitor experiences at our cinemas.
- We use the information you give us through chat (LiveChat) in order to provide you with customer service, allow you to view online moves made by you or our Agents.

## 3. Information we receive from third parties

We sometimes receive your information from other people. This can happen when:

- You participate in market research, such as focus groups or surveys.
- We receive your number from our partners and third parties.
- Vue Entertainment receives certain services from third parties, such as the provision of our CCTV system.

## 4. How we use information and the legal basis

We are allowed to use your data only if we have a proper reason to do so such as:

- to fulfil a contract we have with you;
- when it is in our legitimate interest;
- when you consent to it; or
- to comply with the law.

A legitimate interest is when we have a business or commercial reason to use your data. This involves us making an assessment of when we can rely on our legitimate interests. For more information on this assessment please contact [dataprotection@vuelmail.com](mailto:dataprotection@vuelmail.com).

We have set out below how and why we use your personal information and the legal basis we rely on. This is also where we tell you what our legitimate interests are.

***When you buy something from us, join Vue as a member, or enter a competition we run, we use your information to fulfil our contract with you.***

We take information to communicate with you, check your identity, take payment, and provide products and services.

***To run our business and pursue our legitimate interests, we use your information.***

Our legitimate interests include keeping our records up-to-date, fulfilling our legal, compliance and contractual duties, working out which of our products and services may interest you, improving our website, app and services, developing and publicising new products and services and conducting market research.

### **Further details of our legitimate interests:**

To run and promote our business, we use your information:

- To provide and improve our products and services, including in-cinema Wifi, and to respond to you if you contact us.
- To record call centre communications, including incoming and outgoing calls and emails, for staff training, quality improvement purposes and establishing facts.
- When we monitor Vue Entertainment's website, social media platforms (such as Facebook and Twitter) and online services including our mobile app and responses to

email marketing. If you post comments online or in other media we collect this information, contact you, and use it to improve our products and services.

- To run competitions and promotions and track which offers seem of interest to you.
- To understand you better as a customer by analysing your transactions and other information you provide to us or which we learn through your interactions with us.
- To send you emails including offers tailored to your perceived preferences where you are a Vue member and your preference settings permit this.
- To contact you where you provide us with market research feedback or pass this data to a third-party business partner of ours for panel market research analysis.

To prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, including where we are required to do so by law we:

- Monitor Vue member accounts and review CCTV.
- Record call centre communications and emails.
- Use other organisations to check the validity of the credit or debit card details you use to pay (for further details see “Data sharing” below).

To comply with law, assess and uphold legal or contractual rights and claims, and for monitoring, auditing and training on compliance matters:

- We keep records and pass your data to other members of the Vue International Group. For further details see “Data sharing” below.
- We pass your data to our insurers if necessary (e.g. in the unlikely event of an accident).
- We monitor, and record call centre communications, including incoming and outgoing calls and emails.
- We verify your identity from time to time.
- We keep records to comply with health and safety legislation, including accounting for the number of individuals on our premises and logging accidents.

***We may, if you give us consent:***

- Send you electronic marketing, including promotions and offers, in relation to our products and services if you are a member. *Vue members can subscribe or unsubscribe from our marketing communications at any time by adjusting their account settings online.*
- Use cookies or similar technologies on the website, app and in marketing emails, including analytic cookies. For more details on our use of such technologies, click here to see our **Cookie Policy**.
- Send you push notifications through the app.
- Notify you of the nearest Vue cinema (if you have enabled location services and use the cinema locator in the app or on the website).
- Use your personal data for other purposes where we explain that purpose when we ask for your consent.

When you give consent, you are able to withdraw that consent at any time by contacting us, for instance by emailing [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com). If you do so we can only continue to use your data if another legal basis applies, such as when we're required to do that by law.

Nevertheless, you have an absolute right to opt-out of direct marketing, including profiling for direct marketing purposes, at any time. You can opt out of marketing by selecting "unsubscribe" in emails, by adjusting the preference settings on your Vue account or by emailing [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com).

***When the law requires us to process your data we will do so. This can include:***

- Legal, compliance, regulatory and investigative purposes, including for government agencies and law enforcement.
- When you exercise your rights under data protection legislation, including when you ask to subscribe or unsubscribe from our marketing communications.

## 5. Data sharing

Vue Entertainment is part of the Vue International Group. Details of the Vue International Group can be found on our corporate website at [vue-international.com](http://vue-international.com).

Vue Entertainment shares data with other members of the Vue International Group when they provide us with support, advisory, IT, safety and security, including CCTV, and other services.

For certain activities Vue uses third party service providers. When these service providers ask for customer data from us we share the required information with them.

We use third party providers for the following services:

- Wi-Fi
- Promotional offers
- Customer feedback surveys
- Gift cards (including E-Gifts)
- Loyalty scheme platform
- IT development, support, maintenance and hosting, including the provision of applications and website hosting
- Payments' processing to enable you to pay by credit or debit card
- CCTV system provision and maintenance

If our business is to be integrated with another business or sold, your details would be shared with our advisers and any prospective purchaser's advisers (subject to non-disclosure obligations). Your information will be passed to the new owners on completion of the transaction.

Personal data (including CCTV imagery) will be shared with government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim.

## 6. International transfers

At times we need to send your data outside of the European Economic Area (the EU plus Iceland, Liechtenstein and Norway) ('EEA'). For example, to follow your instructions, comply with a legal duty or to work with or receive services from our service providers who we use to help run your accounts and our services.

If we do transfer information outside of the EEA, we will make sure that it is protected by using one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Some countries have been deemed adequate by the EU.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA or use other mechanisms and measures to achieve adequate protection. We use the Standard Contractual Clauses published by the EU.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.
- Binding corporate rules. These are internal rules adopted by group companies to allow international transfers of personal data to entities within the same corporate group located in countries which do not provide an adequate level of protection.

For service providers in the US, we rely on Privacy Shield. For our service providers in Asia and Oceania, we rely on contractual measures. For further details on the mechanisms used please contact [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com)

## 7. Cookies and similar technologies

Our website, apps and marketing emails use cookies and similar technology. Full information is in our [Cookie Policy](#). This includes information on how to adjust your browser settings to accept or reject cookies.

## 8. Data retention

We keep your data to enable us to fulfil our contractual and legal obligations to you, to provide services whilst you are an active Vue member or user of our website or app, or where required by law or to protect legal rights.

We always look to keep your data for no longer than it is required in line with data protection principles and our processes. For example, we keep:

- Information on Vue members.
- Records of payment information in line with tax law and audit requirements.
- Customer feedback and correspondence with our customer services teams. This enables us to respond to any questions or complaints.
- Information to maintain records according to applicable laws and rules.
- CCTV imagery for up to **30 calendar days** under normal circumstances, after which point it will be deleted. Imagery required for investigative or evidential purposes may be retained beyond 30 days and is securely disposed of upon completion/conclusion of the purpose for which it has been retained.

If you unsubscribe from marketing communications we keep a record of this request indefinitely to ensure we do not send you direct marketing again.

We will retain your data for longer if we cannot delete it for legal, regulatory or technical reasons.

## 9. Your rights

You have rights over your personal data.

You can:

- ask for your information to be corrected;
- ask for your information to be erased or deleted;
- ask us to limit or restrict processing your data;
- object to us processing your data, in particular where we use the data for direct marketing, including profiling for direct marketing purposes (this right to object does not apply if we must process the data to meet a contractual or legal requirement); and/or
- ask us to send you a copy of the personal information we hold for you in a structured digital format (e.g. USB stick) or ask for us to send it to another party.

Certain rights, however, will be limited. We will be obliged by law to keep certain information. We must respect other people's privacy as well, which means we will need to redact or remove information where it includes personal data about someone else, even if it is connected to your data. On occasion there could be a compelling legitimate interest to keep processing your data.

If you want to exercise any of your data protection rights, please see '**Contact details**' below. To process a request from you, we will need to confirm your identity to ensure we're accessing the right data.

You have a right to complain to an EU data protection authority. In the UK, the authority is the Information Commissioner's Office (the "ICO").

## 10. Contact details

To exercise any of your data protection rights or to withdraw consent you can email: [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com).

To discuss or change your Vue account details, including preference settings, you can log into your account and go to 'My account' and Contact Preferences or contact customer services at [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com).

For any queries relating to data protection please contact [dataprotection@vuemail.com](mailto:dataprotection@vuemail.com) or by writing to them at Customer Services, Vue Entertainment, 10 Chiswick Park, 566 Chiswick High Road, London W4 5XS.

If we make any changes or updates to this notice we will post these here.

## 11. Which Vue entity is the controller?

The controller of your information is Vue Entertainment Limited, 10 Chiswick Park, 566 Chiswick High Road, London W4 5XS.

Ster Century (UK) Limited, a subsidiary of the Vue Entertainment Limited, is also registered with the ICO as a data controller, along with the following members of the Vue International Group, as they control certain employee or customer information:

- Vue International Holdco Limited
- Vue International Bidco plc
- Vue Services Limited