

# THE VILLAGE ROADSHOW GROUP OF COMPANIES - PRIVACY POLICY

## 1. INTRODUCTION

### 1.1 Village Roadshow Group of Companies

VRG Holdco Pty Ltd and its subsidiaries (**Village, we** or **us**) operate core businesses including theme parks, cinema exhibition and film distribution.

Through these varied businesses, Village collects information from customers and other parties with whom we deal for a variety of reasons including to enable Village to provide goods and services. Village collects both personal information as defined in the *Privacy Act 1998 (Cth)*(**Privacy Act**) and non-personal information and data.

Village takes seriously its obligations in respect of the personal information it collects. To safeguard that information, Village has implemented a program to ensure compliance with the Privacy Act and the Australian Privacy Principles (**APPs**).

## 2. COLLECTION OF PERSONAL INFORMATION AND DATA

### 2.1 Nature of Information

The personal information which Village collects depends on the nature of your interactions with us. We may collect personal information about consumers, members of loyalty programs, suppliers, contractors, employment applicants, and other parties we deal with (**customers**).

The personal information may include:

- name, gender, date of birth, contact details;
- payment details (such as credit/ debit card number and expiry date) provided when purchasing our products and services;
- personal bank account details, for example to award prize money won in promotions;
- loyalty program membership number and details including buying history, date of joining, opinions and product preferences;
- information about your use of our goods and services and other goods and services you may be interested in; and
- employment applications.

Village (or its agent) collects certain information of shareholders for registration purposes, such as name, address, number of shares held, tax file number and bank account details. Village is required to maintain a register of shareholders under the *Corporations Act 2001 (Cth)*.

### 2.2 How Village Collects Personal Information

Village may collect personal information when a customer uses our services or purchases our goods, registers to receive our communications, joins as a member of one of our loyalty programs, enters a competition or promotion managed by us (including where a third party organisation is the promoter), visits our websites, applies for employment, completes a survey or otherwise interacts with us.

There may be occasions when Village collects personal information about a customer from a third party. These third parties may include agents and other people who sell goods or services to customers for us or who interact with customers on our behalf; third parties who run competitions and other promotions for us; recruitment agencies; sharebrokers when shares in Village are purchased and social media. Village engages third parties who provide us with information about customers collected from publicly available sources or from their own databases.

In accordance with the APPs, where practical, customers may deal with Village anonymously. However, frequently it is necessary to collect personal information during the course of transactions.

### **2.3 What happens if Personal Information is not provided?**

Village may not be able to provide a proper service to customers or undertake the activities set out at 3.1 if personal information is not provided upon request.

### **2.4 Cookies**

Village uses cookies, and may use pixel tags, web beacons, clear GIFs or other similar technologies, to collect personal information and anonymous units of data sent to a user's browser by a website the user visits (**Cookie Data**). Village uses Cookie Data to:

- understand its customers and their preferences;
- facilitate and improve a customer's website browsing experience;
- better understand how its websites are used; and
- provide customised messages and advertising personalised to customer's interests.

If a loyalty club member is logged into their account or a subscriber to a Village mailing list enters a competition or promotion managed by us, the Cookie Data Village collects will be linked with that member's or subscriber's personal information.

You can configure your Internet browser to erase Cookie Data from your computer or device, prevent the collection of Cookie Data or receive a warning before a collection of Cookie Data. If a customer disables the collection of, or deletes, Cookie Data on their web browser then they may not be able to gain access to all the content and facilities of Village's websites.

### **2.5 Data Collection and Use**

Village may use Cookie Data, data from third parties, Google Analytics (including Google remarketing) and Facebook remarketing to deliver targeted advertisements or content to a customer about products and services based on the webpages visited and the way in which that customer accesses its websites.

With your permission, location data may be collected via certain Village apps, to personalise services and functionality for you. If you are logged into an account you have with Village, the location data will be linked with your personal information. You can change your location permissions for apps within the settings on your device.

Village may aggregate data collected via these sources with other information collected from customers. To the extent that this data or information constitutes personal information, Village will only use the information in accordance with the Privacy Act and the APPs.

## 2.6 Data Disclosure

Village engages with third parties (Marketers) to enable delivery of targeted advertising and promotional content when customers visit Village's websites or third party websites. Targeted content may advertise Village's goods and services or the goods and services of a third party. Marketers which Village discloses data to (such as Cookie Data) include companies providing advertising services or data analysis and also:

- (a) **Warner Bros:** where customers visit Village websites containing Warner Bros content, Village may disclose the data it collects to Warner Bros to use as a remarketing tool;
- (b) **Google:** Village's websites use Google Analytics, a web analytics service. A data privacy statement regarding the use of Cookie Data by Google Analytics can be found at: <https://policies.google.com/technologies/partner-sites>. Customers can prevent Google from detecting a cookie that is generated because of and related to their usage of a website (including their IP address) as well as processing of the data by downloading and installing this browser plugin: <http://tools.google.com/dlpage/gaoptout?hl=en>; and
- (c) **Facebook:** Facebook uses Cookie Data to match profiles within their platform to create targeted audiences to deliver relevant content. Any information collected by Facebook is subject to its privacy policy available at <https://www.facebook.com/privacy/explanation>.

## 3. USE AND DISCLOSURE OF PERSONAL INFORMATION

### 3.1 Use of Personal Information

Village may use personal information for the following purposes:

- (a) to provide and administer goods and services, such as verifying a customer's identity contacting customers about orders and bookings and processing payments;
- (b) to operate competitions, promotions and events managed by Village (including where we provide this service on behalf of third party organisations);
- (c) to distribute communications itself or with the assistance of third party service providers;
- (d) to provide customer support, including assistance with ordering goods and services and responding to other enquiries or requests;
- (e) to conduct marketing activities for Village's goods and services, or goods and services of third parties, and to conduct market and other research to improve Village's products, services and marketing activities;
- (f) to create aggregate data through demographic profiling and statistical analysis of the database to provide to third parties and to allow for more efficient operation of Village's businesses;
- (g) to register shareholdings and to contact customers in relation to shareholdings;
- (h) to conduct market research and analysis;
- (i) to facilitate participation in loyalty and rewards programs;
- (j) to manage employment applications;
- (k) to establish, exercise or defend any legal claims;
- (l) fraud prevention; and
- (m) to maintain records and comply with Australian law.

### **3.2 Disclosure of Personal Information**

Village will only disclose personal information in compliance with this Privacy Policy. Village may disclose personal information to:

- (a) officers, employees or contractors of Village in order to discharge their duties;
- (b) Village group companies, related bodies corporate and business partners;
- (c) third parties where Village believes that access is necessary to achieve the purpose for which the personal information was collected;
- (d) service providers (such as auditors, accountants and lawyers) and other professional services firms;
- (e) law enforcement agencies, regulatory authorities and government bodies and other authorities to whom Village is required to disclose personal information under any law, regulation, order or direction, including in respect of a pandemic or state of emergency;
- (f) couriers, computer security companies and hosting services;
- (g) payment system operators, banks and financial institutions. Customers of Village may be presented with the option of having their credit card details retained (by a third party) for future purchases; and
- (h) certain Marketers such as Rokt Pte Ltd, a Singapore company (**Rokt**). Cookie Data (including personal information) from some Village websites may be disclosed to Rokt so that Rokt can display personalised offers to customers, who can then choose to opt-in to the offers. If a customer chooses to opt-in, their name, email address and other limited information about their transaction with Village will be provided by Rokt to the relevant advertiser to enable fulfilment of the offer. Any information collected by Rokt is subject to its privacy policy available at <https://rokt.com/privacy-policy/>.

### **3.3 International transfers**

Village may disclose personal information to overseas service providers. Village will only do so in compliance with Australian privacy laws and will take reasonable steps to ensure the overseas service providers handle the personal information in accordance with the APPs. Village will take reasonable steps to protect personal information regardless to which country it is transferred.

Village may also disclose personal information to Marketers, service providers, third parties who process data, operate customer experience surveys and send our marketing emails to subscribers. The countries in which these third parties are located include the United States, New Zealand, Singapore, Ireland, the Philippines and South Africa.

### **3.4 Storage and Security**

Personal information may be stored in hard copy, electronic files or both. Hard copy personal information is wherever practical, kept under locked security. Personal information stored on computer is wherever practical, password protected. Village uses third party information system providers who may store or have access to personal information. Where possible and practical, Village will endeavour to comply with recognised Australian and international standards relating to information security. Village deletes and de-identifies personal information when the information is no longer needed by Village.

### **3.5 Updating Personal Information**

Village monitors the quality and accuracy of personal information that it maintains and where practical, updates personal information on a regular basis. Customers can update or correct their personal information at any time by contacting Village's Privacy Officer.

#### **4. MINORS**

Village's position is that a young person is able to give their consent when they have a sufficient maturity to understand what is being proposed. Where practical, when obtaining personal information from minors, Village will make an assessment before collecting the information as to whether the minor would be able to provide informed consent to the use of their personal information.

#### **5. COMPETITIONS**

Personal information collected during competitions run by Village will be governed by the principles set out in this Privacy Policy and any privacy collection notice in the conditions of entry for the competition.

#### **6. DIRECT MARKETING**

Personal information collected for direct marketing purposes will only be collected, used or disclosed with the consent of the customer.

However, in some circumstances where Village cannot practically obtain the consent of a customer, Village may still engage in direct marketing, but will:

- (a) include an 'unsubscribe' facility so customers can unsubscribe from the mailing list at any time or contact the Privacy Officer to remove the customer's details from the mailing list; and
- (b) include a prominent statement to the fact that a customer may make such a request.

#### **7. ACCESS TO PERSONAL INFORMATION**

Customers wishing to request access to, or correct, personal information held by Village should contact the Privacy Officer using the contact details in the section below titled "Who to Contact".

Village will provide access to the information held about the individual, including for the purpose of correcting or updating that information, unless there is an exception which applies under the APPs. Any request to provide access to this information will be dealt with within a reasonable time.

If Village refuses to provide a customer with access to their personal information, Village will provide written reasons and the customer's options with respect to the refusal. Loyalty program members may update their own profile information online or by contacting the Privacy Officer.

## **8. WHO TO CONTACT**

Village is committed to working with its customers to obtain a fair resolution of any complaint or concern about privacy.

If you have a concern about your privacy or a query on how your personal information is collected or used please contact Village using the details below. We will respond to your query or complaint within a reasonable time. If you are not satisfied with Village's response, you may also contact the Office of the Australian Information Commissioner.

Privacy Officer  
Village Roadshow  
Level 4,650 Chapel Street  
South Yarra, Victoria 3141  
Email: [privacy@roadshow.com.au](mailto:privacy@roadshow.com.au); [legalnotices@vrl.com.au](mailto:legalnotices@vrl.com.au)