



PRIVACY POLICY

VRG Holdco Pty Ltd ACN 642 854 313, its related bodies corporate and subsidiaries form the Village Roadshow Group of Companies which we will refer to in this Privacy Policy as “**Village**” “**we**” or “**us**”.

Village operates businesses including theme parks, cinema exhibition and film distribution and provides services through:

- Village Roadshow Theme Parks and its associated loyalty programs;
- Village Cinemas and its associated merchandise store and loyalty programs;
- Roadshow Films;
- Intencity; and
- Opia.

Further information about these businesses can be found at villageroadshow.com.au.

Village collects personal information as defined in the *Privacy Act 1988* (Cth) (**Privacy Act**). Village takes its obligations with respect to the collection of personal information seriously. Village is committed to ensuring that personal information is collected and used in a lawful and secure manner. Opia is UK based and subject to its own privacy policy. We have stringent processes in place to safeguard your privacy in compliance with the Privacy Act and the Australian Privacy Principles (**APPs**).

1. The personal information collected

- 1.1. Village may collect your personal information, depending on the nature of your interactions with us. We may collect personal information about consumers, members of loyalty programs and/or mailing lists, suppliers, contractors and employment applicants.
- 1.2. The personal information collected 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;
 - technical and usage data when you access our websites or applications (including through the use of cookies and analytics); and
 - employment applications.
- 1.3. Village may also collect certain information of shareholders for registration purposes, such as name, address, number of shares held, tax file numbers and bank account details. Village is required to maintain a register of its shareholders under the *Corporations Act 2001* (Cth).

2. How personal information is collected

- 2.1. The collection of personal information by Village is done in accordance with the Privacy Act.
- 2.2. Village may collect personal information:
 - when a customer uses its services or purchases its goods
 - registers to receive its communications
 - joins as a member of one of its loyalty programs
 - enters a competition or promotion managed by Village (including where a third-party organisation is the promoter)
 - through CCTV footage at a Village site
 - visits its websites
 - applies for employment
 - completes a survey or otherwise interacts with it.
- 2.3. 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; and social media. Additionally, Village engages third parties who provide us with information about customers collected from publicly available sources or from their own databases.
- 2.4. We use CCTV cameras at some of our sites (cinemas and theme parks). These cameras may capture images or footage of you when you visit our sites. Village may collect, use and retain this footage to help keep our guests, staff and property safe and secure, to improve our products and services, and for research and operational purposes.

3. How personal information is stored

- 3.1. When Village collects personal information, it is securely collected, processed, stored, encrypted and maintained in accordance with the Privacy Act and APPs as well as Village's IT security framework. As part of this process, Village uses third party information system providers who may store or have access to personal information in an encrypted and anonymised format.
- 3.2. Village maintains guidelines for the retention and deletion of personal information. Village deletes and de-identifies personal information when the information is no longer needed by Village.
- 3.3. Village also provides its customers with the option to delete any online accounts which have been registered on Village websites or apps and to unsubscribe from any Village mailing lists.
- 3.4. You may contact Village at any time by contacting us using the **Who to contact** details below if you have any questions regarding any personal information that you have provided to Village or if you would like to request the deletion of your personal information from Village's database.

4. What happens if personal information is not provided

In some instances, Village may need to collect personal information. However, if you refuse to provide personal information when requested, it may mean that we are not able to provide goods and/or services to you.

5. Use of personal information

- 5.1. We only retain personal information for as long as necessary to fulfill legal, business, and operational purposes, and we take reasonable steps to securely delete or de-identify data when no longer required.
- 5.2. Village may use personal information for the following purposes:
 - to provide and administer goods and services, such as verifying a customer's identity contacting customers about orders and bookings and processing payments;

- to conduct our business in a safe and efficient manner including complying with relevant public health orders;
- to operate competitions, promotions and events managed by Village (including where we provide this service on behalf of third party organisations);
- to distribute communications itself or with the assistance of third party service providers;
- to provide customer support, including assistance with ordering goods and services and responding to other enquiries or requests;
- 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;
- 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;
- to conduct market research and analysis;
- to facilitate participation in loyalty and rewards programs;
- to manage employment applications;
- to establish, exercise or defend any legal claims;
- fraud prevention; and
- to maintain records and comply with Australian law.

6. Collection of data and personal information through websites

- 6.1. Village and its partners use cookies, pixels, web beacons, SDKs and similar technologies (**Analytics Data**) to collect personal information and anonymous units of data about your use of our websites, mobile applications, emails and online services.
- 6.2. Village may use Analytics 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, marketing communications and personalised advertising to customer's interests.
- 6.3. 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 Analytics Data Village collects will be linked with that member's or subscriber's personal information. You can configure your Internet browser to erase Analytics Data from your computer or device, prevent the collection of Analytics Data or receive a warning before a collection of Analytics Data. If a customer disables the collection of, or deletes, Analytics Data on their web browser then they may not be able to gain access to all the content and facilities of Village's websites.
- 6.4. Village also utilises pixel tags, server-based tools, analytic and remarketing tools via Google, Meta, Microsoft Clarity, The Trade Desk, Emarsys and TikTok which all use first and third party cookies. Village uses these tools to deliver limited, securely hashed customer data for the purpose of 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.
- 6.5. 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.
- 6.6. Village may use artificial intelligence, machine learning and other automated technologies to assist with customer service, content personalisation, marketing, analytics, fraud detection, business operations and system administration. These technologies may be used to analyse personal information, customer preferences, purchasing patterns, website and app interactions, marketing engagement and participation in Village products, services or programs. Village does not use solely automated decision-making processes to make decisions that produce legal or similarly significant effects on individuals without appropriate human oversight.

7. Disclosure of personal information

- 7.1. Village will only disclose personal information in compliance with the Privacy Act, APPs and this Privacy Policy. Village may disclose personal information to:
- Village officers, employees and contractors, to the extent necessary for them to carry out their duties in connection with the primary purpose of collection;
 - Village related bodies corporate and business partners where reasonably necessary for Village's business operations;
 - 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, who run competitions and other promotions for us and manage our social media;
 - third parties where the disclosure is required to achieve the purpose for which the information was collected;
 - specific marketing service partners;
 - professional advisers and service providers, including auditors, accountants, lawyers and other firms providing services to Village, in accordance with their contractual and statutory confidentiality obligations;
 - law enforcement agencies, regulators, government bodies and other authorities, where required or authorised under Australian law, a court or tribunal order, or where reasonably necessary for enforcement-related activities;
 - technology and operational providers, such as couriers, cyber-security firms, IT service providers and hosting companies engaged to support Village's operations; and
 - payment system operators, banks and financial institutions. Customers may be offered the option to have their payment-card details securely stored by a third-party payment provider for future transactions.

8. Cross-border transfer of personal information

- 8.1. Village may disclose personal information to overseas service providers. Village will only do so in compliance with the Privacy Act and APPs and will take reasonable steps to ensure the overseas service providers protect and handle the personal information in accordance with the Privacy Act and APPs.
- 8.2. By using its websites, you understand that Village may also transfer personal information to marketers, service providers, third parties who process data, operate customer experience surveys. The countries in which these third parties are located include India, Ireland, New Zealand, the Philippines, Singapore, South Africa, United Kingdom and the United States of America.
- 8.3. Village will take reasonable steps to protect personal information regardless to which country it is transferred.
- 8.4. Village engages customer service providers, contact centres or support service providers located outside Australia. Authorised personnel located outside Australia may have access to personal information reasonably required to provide customer support, reservations, bookings, membership administration, loyalty program support and complaints handling services.

9. Updating your 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 us using the **Who to contact** details below.

10. Young people

- 10.1. Village protects the personal information of all people, regardless of their age.

- 10.2. The Office of the Australian Information Commissioner's (**OAIC**) position is that a young person has the capacity to give consent when they have a sufficient maturity to understand what is being proposed. When obtaining personal information from young people, Village will make an assessment on capacity before collecting or retaining personal information.
- 10.3. Village encourages parents, guardians and young people to contact us using the **Who to contact** details below with any questions or concerns regarding the personal information of young people or to exercise rights under this policy.

11. Access to your personal information

- 11.1. 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**.
- 11.2. Village will provide access to the information held about the individual, including for the purpose of correcting, updating or deleting that information, unless there is an exception which applies under the Privacy Act, the APPs or any other law. Any request to provide access to this information will be dealt with within a reasonable time.
- 11.3. 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 using the **Who to contact** details.

12. Updates to this policy

Village may update this Privacy Policy from time to time to reflect changes in our business practices, legal or regulatory requirements, or to ensure it remains accurate and transparent. Any updates will be published on our website and will take effect upon posting, unless otherwise required by law. We encourage individuals to review this Privacy Policy periodically to stay informed about how we handle personal information.

13. 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