



## PRIVACY POLICY OF CINEMAWELL.COM

*Please read all terms and conditions of privacy policy carefully before using CinemaWell and transferring your personal data to the CinemaWell Limited!*

### 1. GENERAL TERMS

1.1. This document (hereinafter - Privacy Policy) determines the conditions of processing personal and other data of CinemaWell Theater Users.

1.2. Privacy Policy is an integral part of User Agreement of CinemaWell. All terms and definitions of Privacy Policy are defined by User Agreement.

1.3. When registering in CinemaWell Theater or during actual use of its facilities and services, including viewing the Site, pages of the Site and any other use of CinemaWell Theater, You (the User) fully accept all terms of the Privacy Policy and unconditionally agree to transfer your personal and other data, including the acceptance of the cross-border transfer, to the Company CinemaWell Limited and / or its affiliates, and consent to the processing of all transferred personal and other data by the Company CinemaWell Limited and / or its affiliates.

1.4. If the User does not agree with any term or condition defined by the Privacy Policy, they shall immediately cease all use of CinemaWell Theater.

1.5. CinemaWell Limited has the right to amend or otherwise modify this Privacy Policy at any time and without any prior or subsequent notification to the User, and the User unconditionally accepts all such additions and amendments. In case the User does not agree with the additions or changes to the terms of this Privacy Policy, they shall immediately cease all use of CinemaWell Theater. All additions and other changes to the Privacy Policy will take effect from the date of publication of the new edition of the Privacy Policy in CinemaWell Theater. CinemaWell Limited reserves the

right to notify Users of the additions and changes this Privacy Policy at any convenient time by posting a notice in the form of banners and other elements in the CinemaWell Theater. In any case, the User is obligated to monitor all amendments and other changes to the User Agreement by visiting the following address in the Internet: <http://www.cinemawell.com/>. The User undertakes to regularly, but not less than once in ten days, get acquainted with the content of this Privacy Policy in order to monitor its timely additions or other changes.

1.6. Privacy Policy, as well as the relationship between CinemaWell Limited and the User, arising from the application of the Privacy Policy, shall be governed by and construed in accordance with the laws of the Russian Federation. Any questions not regulated by Privacy Policy shall be settled in accordance with the laws of the Russian Federation.

1.7. All designations and section titles of the Privacy Policy do not bear any legal sense and are intended solely for the reading convenience. Uppercase and lowercase letters of definitions and terms are used for reading convenience of the privacy policy.

## **2. CASES OF PROVISION AND PURPOSE OF PROCESSING PERSONAL AND OTHER DATA**

2.1. Cases of provision personal and other data by the Users of the CinemaWell Limited:

2.1.1. User Registration in CinemaWell Theater or verification as a Pro-account User.

2.1.2. When using the facilities and services of CinemaWell Theatre (if they require provision of personal data).

2.1.3. When participating in advertising, marketing and other activities carried out in CinemaWell Theater.

2.1.4. Implementation of any payments (purchase of tickets and services as well as other cases).

2.1.5. Any use of the CinemaWell Theater (receiving IP-address of the User, information about the browser or the User's application, time and place of access to the CinemaWell Theater).

2.1.6. Upon request by CinemaWell Limited in cases specified in the User Agreement, or in connection with the implementation or termination of the User Agreement.

2.2. The list of cases referred to in paragraph 2.1. of Privacy Policy is not full or comprehensive.

2.3. Purposes of processing personal and other User data:

2.3.1. Providing the User with a variety of services. The implementation of the User Agreement of CinemaWell Limited.

2.3.2. User Identification within the User Agreement and other agreements.

2.3.3. Registration in CinemaWell Theater as viewers and theater owners, verification of a User Pro-Account.

2.3.4. Sending the user all the necessary notifications, letters, requests and any other information, including advertising. Answering to mail and requests that are sent to CinemaWell Limited by the User.

2.3.5. Interaction with other Users.

2.3.6. Continuous improvement of the quality and usability of CinemaWell Theater, elimination of obvious and hidden malfunctions in CinemaWell Theater.

2.3.7. To conduct surveys and to obtain statistical and other data in CinemaWell Theater, including User attendance data (using cookies - text files or pieces of information that can be stored in the User's web browser on the device, with the help of which the User accessed the CinemaWell theater).

2.3.8. Provision of technical support.

2.3.9. Receiving and transferring comments and assessments regarding CinemaWell.

2.3.10. Prevention of fraud and other illegal use of CinemaWell.

2.4. The list of the purposes specified in paragraph 2.3. of Privacy Policy is not full or comprehensive.

### **3. USER'S PERSONAL DATA**

3.1. Personal data that the User discloses to CinemaWell Limited include the following information: name, surname, patronymic; sex; age and date of birth; address of permanent or primary residence; numbers of landline and / or mobile phones; e-mail addresses; billing information; ID (account) in social networks.

3.2. Other data that CinemaWell Limited collects and processes include: a unique identifier in CinemaWell Theater; type of device through which the User accesses CinemaWell; data about the User's browser and operating system; time zone, region, location of the user; User's activity in CinemaWell Theater (activity log, the time spent in the CinemaWell Theater; time of last access to the CinemaWell Theater).

3.3. The list of personal and other information specified in paragraph 3.1. and 3.2. of Privacy Policy is not full or comprehensive.

3.4. The User is responsible for the completeness and accuracy of personal (and other) data provided to the CinemaWell Limited. In case of discrepancy the User is obliged to contact CinemaWell Limited in the order specified in paragraph 2.7. of the User Agreement and provide all the right data.

### **4. TERMS OF PROCESSING, USING AND TRANSFERRING PERSONAL AND OTHER DATA**

4.1. CinemaWell Limited process personal and other User data only for the purposes specified in the User Agreement. CinemaWell Limited maintains the confidentiality of all personal and other User data.

4.2. CinemaWell Limited has the right to combine or use combined personal and other User data to ensure the functionality of CinemaWell Theater, to improve its quality and stability.

4.3. Personal and other user data can be transferred by CinemaWell Limited to other parties in the following cases:

4.3.1. When such a transfer is necessary to comply with laws, including the investigation of illegal activity in CinemaWell Theater.

4.3.2. When such a transfer is necessary to protect the rights of the CinemaWell Limited and / or its affiliates, as well as other parties.

4.3.3. When such a transfer is made after a lawful request of the state or other authoritative body.

4.3.4. To the rightholders, when such transfer is necessary for the functioning of the Theater.

4.3.5. In cases of violations or suspected violations of the intellectual property rights.

## **5. PROTECTION AND STORAGE OF PERSONAL AND OTHER USER DATA**

5.1. CinemaWell Limited shall take all necessary technical and organizational measures to protect personal and other data collected from Users from unauthorized or accidental access by third parties.

5.2. CinemaWell Limited reserves the right, in case of changing or deleting personal and other user data, to store the personal and other data that are necessary for compliance with law, security and efficiency of CinemaWell Theater.