

O'NEIL CINEMAS PRIVACY POLICY

O'Neil Cinemas values our relationships with our guests. As part of our commitment to providing best-in-class service to our guests, we have created this policy to describe our policies regarding our collection of information from consumers ("you" or "your"), our use of such information, and our privacy practices with respect to same. So that you may make informed decisions regarding your personal information, we strongly urge you to review this policy completely and carefully.

This privacy policy applies to any personal information collected by O'Neil Cinemas (collectively, "we", "our", or "us") from you, including, without limitation, through your (i) use of our website and/or mobile application(s) (together, "Services"), (ii) participation in the OC Loyalty Club program, or (iii) any sweepstakes, promotion, or survey offered by us.

While your acceptance of this policy is voluntary, your continued use and/or participation in any of the foregoing constitute your acceptance of this policy and any other applicable terms.

How O'Neil Collects Data.

Except as otherwise provided in this privacy policy, you may generally use the Services without disclosing personally identifiable information. However, use of certain aspects of the Services may require you to submit personally identifiable information, including the following:

- When you use our mobile application, you will be able to view movie show times within the app. In order to use additional functionality, such as making ticket and/or concession purchases and storing credit card number(s), gift card number(s), and OC Loyalty Club Rewards account number within the app, you will need to create an account and user profile. In order to create an account, you will be asked to provide your name, street address, email address, phone number, birthday, and other marketing preferences. We will have access to the information within your user profile, as well as the information regarding your location, genre, and language preferences, as soon as your account is created. We are able to view only a truncated version of any credit card number stored within the app. Through your use of the app, we may collect information on your transactions within the app, including, without limitation, the movies you see, theatres you attend, and any concessions purchases you make.
- When you use the Services through one of our mobile applications, we may collect precise or general location data ("Location Data") as part of the functionality of the Services. We collect Location Data in several ways from your wireless carrier and/or directly from the device on which you use the Services. If you are accessing the Services through one of our mobile applications, the way we collect Location Data will differ depending

on your mobile device's operating system. In all events, we do not collect Location Data, unless you have "allowed" its collection. If you decline to allow Location Data collection in the app, we will not collect your Location Data unless you manually enter it into the app.

- When you register for the OC Loyalty Club program, you will be asked to provide your name, street address, email address, phone number, birthday, and other marketing preferences. Through your participation in the OC Loyalty Club program, we may collect information on your movie theatre transactions as well as concessions and food and beverage purchases at our theaters, including, without limitation, the movies you see, concession items you purchase, and theatres you attend.
- When you visit one of our theatres, you may be recorded by one or more of our security cameras placed throughout the building. We use these cameras for the purposes of security, crime deterrence, safeguarding assets, and investigations. Audiovisual information, such as CCTV footage, recordings of interactions between our guests and associates, and identification pictures for verifying age and identity of guests and associates may also be collected through these cameras.

We also collect data from you in ways that do not allow us to easily identify you. When you visit our website, we automatically collect data on your website usage and online behavior, e.g., previous websites you visited, your computer's web browser, operating system, and IP address, and how you navigate and interact with the O'Neil website. See the "Third Parties" section below for more information. Similarly, when you use our mobile application, we may collect certain information automatically, such as the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, the operating system for your mobile device, the type of mobile Internet browsers you use, and information about the way you use our app.

We may also collect additional information from you, depending on how you engage with us. For example, we may collect information from you if you post messages to our social media pages, communicate with us through email or online comment cards, or participate in surveys or site registrations. While we generally limit the use of such information to our own internal use to respond to your communication, address guest concerns, and/or improve the guest experience, we may post guest feedback and comments on our website or on social media.

How O'Neil Uses Data.

We use information collected from you in a number of ways, including, without limitation, to provide the goods and services you purchase from us, to improve the content and navigation of the Services, to assist in the marketing and promotion of films, events, and offers in which you may be interested, to communicate with you for customer services purposes, and to prevent and detect fraud or other misuse of the Services, OC Loyalty Club program, and/or promotions. We routinely share information with third parties, such as motion picture distributors, industry data sharing services, and promotional and

other business partners, but such data is generally shared on an aggregated basis, meaning that such third parties are not able to identify you using the data provided.

We use Location Data to provide you certain location-based services and conduct analytics to improve the Services. For example, when you use the Services and you have enabled geolocation tracking on your mobile device, we will collect your Location Data to display show times at our theatres nearest to your location. We never share your Location Data, which is retained only during your current session within our mobile applications.

We take reasonable measures and implement appropriate safeguards to protect your personal information. However, by using the Services, you acknowledge that transmission of information over the Internet is, inherently, not secure. Security breaches cannot be prevented entirely. BY CONTINUING TO USE THE SERVICES, YOU ACCEPT THE RISK THAT A SECURITY BREACH INVOLVING YOUR PERSONAL DATA MAY OCCUR.

Third parties.

We may retain third parties to place and manage advertisements on the Services. These third parties may automatically collect information from you, through cookies, pixels, and other technology, in order to provide you with advertisements for goods and services in which you may be interested.

We use Google Analytics to collect information about your use of the Services, your navigation to the Services, the time and date you used the Services, and your IP address. Google uses this information to provide us reports about traffic on the Services. For more information, please visit www.google.com/policies/privacy/partners.

In addition, the Services may contain links to other websites that are not operated or controlled by us, such as our online ticketing vendors and social networking sites. We do not endorse the content, nor make any assurances about the security, of these websites. We are not responsible for the privacy practices or content of third-party websites. This policy applies only to the information collected by us as specified in this policy. It is your responsibility to understand the individual privacy policies of any website you visit.

Cookies.

What are cookies?

The O'Neil Cinemas website uses so-called cookies. These are small files that are stored on your computer or mobile end device whenever you visit or use our website. Cookies store certain settings through your browser as well as data about how you interact with the website through your browser. Whenever a cookie is activated, it is

allocated an identification number (cookie ID) through which your browser is identified and the information contained in the cookie can be used.

We use temporary session cookies that are automatically deleted from your computer or mobile end device at the end of your browser session. In addition, we also use permanent cookies. These cookies remain stored on your computer or mobile end device after the end of your browser session. These permanent cookies remain stored on your computer or mobile end device for a period between one month and ten years, depending on the type of cookie, and are automatically deactivated at the end of the programmed time period.

Why do we use cookies?

The cookies used by us are intended to enable various functions on our website. Cookies can for instance help to store your favored O'Neil Cinemas location and language default settings or a login for the OC Loyalty Club account over the various pages visited during a web session. By using cookies, we can also record and analyze the usage patterns of visitors to our website. This enables us to design our website in a more effective and user-friendly manner, thereby making your visit to our website as pleasant as possible. In addition, we can display information to you on the website that is specifically tailored to your interests.

Website use by children under 13 years of age.

We do not specifically target the Services to children under 13 years old. If you are under the age of 13, you should only use our website and applications under the supervision of a parent or guardian.

Policy Changes.

We reserve the right to change this policy at any time without notice. You are responsible for keeping apprised of the current policy; thus, we encourage you to check the policy periodically. The policy posted at [\(web page address\)](#) is the current policy. Your continued use and/or participation in the Services, loyalty program, promotion, etc., constitute your acceptance of any revised policy. Notwithstanding the foregoing, we will endeavor to provide notice of any material changes to this policy by sending an email explaining such changes to you at your email address on file with us if you are a Newsletter Subscriber and by posting notice on our website.

Disclosures.

We may be required to share personal information with third parties, including law enforcement or government agencies, as a result of a court order, subpoena, or as otherwise required by law. Additionally, we may disclose your information as part of a planned or potential corporate sale, merger, reorganization, consolidation, or similar events. Your information will be treated as an asset and be transferred to the purchaser as part of a sale or other transaction.

Opting Out.

You are never obligated to provide us with any personal information. At any time, if you would like to cease receiving communications from us or limit our ability to share your information with third parties, you may “opt out.” If you do not want to receive communications from us in the future or have personal information shared with third parties, fill out the form at <https://oneilcinemas.com/littleton-ma/contact/> and indicate your preference.