

Last Revision: August 2018
PRIVACY POLICY

This privacy policy (hereinafter the "**Privacy Policy**") details how Bal du Moulin Rouge S.A., a public limited company with capital of 4,515 676.00 euros, registered with the Trade and Companies Register of Paris under the number B 552 046 120, having its registered office at 82 Boulevard de Clichy - 75018 Paris (France) (hereinafter the "**Moulin Rouge**"), collects and processes the personal data of the users (hereinafter the "**Users**" who visit or use the features and services offered on either of the Moulin Rouge's websites accessible at the URLs www.moulinrouge.fr and www.moulinrougestore.com (hereinafter the "**Websites**").

The person in charge of the questions regarding the personal data protection of the Moulin Rouge can be reached at the following address information@moulinrouge.fr.

Constitutes a personal data any information related to the User, as identified individual or who could be identified, directly or indirectly, by reference to an identification number or to one or several elements of its own (notably its name, surname, date of birth, postal address, email address, photo, curriculum vitae, hereinafter referred "**Personal Data**").

The Privacy Policy covers all the processing carried out by the Moulin Rouge and forms an integral part of the [general terms and conditions of use](#), the [general terms and conditions governing ticket sales](#) and the [general terms and conditions for the sale of products online](#) which the User must read and also accept, if applicable.

The Moulin Rouge encourages the Users to carefully read the terms and conditions of the Privacy Policy before using any of the Websites and disclosing any of their Personal Data.

Users can consult the Privacy Policy on the Websites at any time, outside the maintenance period, by clicking the link labelled "PERSONAL DATA" at the bottom of the web pages of the Websites.

To the extent permitted by law, if there is any contradiction between the French version of the Privacy Policy and the English translation, the original French version will prevail.

1. Ethics

The Moulin Rouge and, where applicable, its subsidiaries and affiliates, protect the privacy of Users by complying with the laws in force.

To this end, the Moulin Rouge and, where applicable, its subsidiaries and affiliates, collect and process the Personal Data concerning the Users in accordance with the national and European laws in force and notably the Regulation (EU) 2016/679 of the General Data Protection Regulation (hereinafter "GDPR").

All Personal Data is processed with due care and confidentiality.

The Privacy Policy details how the Moulin Rouge and, where applicable, its subsidiaries and affiliates, use the Personal Data and inform Users of the measures taken by the Moulin Rouge to ensure the protection of Personal Data, in accordance with the provisions of the French Data Protection Act (*Loi Informatique et Libertés*) of 6th January 1978 as amended (hereinafter the "**French Data Protection Act**") and in accordance with provisions of the GDPR.

2. Collection of personal data

2.1 To view and visit the Websites, the User does not, in principle, have to provide any of his own Personal Data, excepting Cookies potentially implemented under the conditions specified hereunder.

The Moulin Rouge is only likely to collect Personal Data from Users through the tabs "CONTACT", "NEWSLETTER", "RECRUITMENT", "ACCOUNT", "ORDER" or "RESERVATION" in order to ensure proper monitoring of the requests made by the User.

2.2 Any User wishing to subscribe to the newsletter, open an account, place an order or make a reservation through the Websites must complete a detailed application form as provided for this purpose, give information about his identity, provide a valid e-mail address, and confirm his consent to the general terms and conditions of use (GTCU) and to the general terms and conditions of sale applicable (GTCS) as well as to this Privacy Policy.

2.3 Any User wishing to apply as an artist or dancer must complete a detailed application form as provided for this purpose, give information about his identity, provide a valid e-mail address, and confirm his consent to this Privacy Policy.

In support of his application and to demonstrate his artistic talent, if he wishes, the User may also upload photographs and a link to a media of his choice so as to illustrate his skills (e.g. presentation of his CV on LinkedIn, performance art videos on YouTube, etc.).

2.4 When gathering the Personal Data, the User expressly agrees to provide only information that is complete, accurate and up to date, and not detrimental to the interests or the rights of third parties.

The information required in order to carry out the tasks described above is indicated by an asterisk in the different pages of the Websites concerned. The other information is optional.

3. Purpose and legal basis of the processing of personal data

The personal data processing carried out by the Moulin Rouge has for legal basis the execution of the contract and the precontractual measures or the consent of the Users.

The Moulin Rouge processes Personal Data particularly in order to:

- send information related to the activities of the Moulin Rouge;
- manage the Users' profiles and orders through the accounts;
- manage the reservation and ticketing services;
- carry out operations related to promoting the activities of the Moulin Rouge, including commercial prospecting and the management of technical prospecting operations (which includes, in particular, technical operations such as standardization, enrichment and data deduplication) in compliance with the laws in force;
- manage requests from Users and develop the statistics needed to improve the Websites;
- organise contests, lotteries or any promotional activity;

- carry out the recruitment of new artistic talent and manage the applications;
- manage requests for the right to access, correct, object, limit and have personal data deleted in accordance with the General Terms and Conditions.

4. Recipients of the personal data

The Moulin Rouge is responsible, as controller, for the processing of the Personal Data of Users As listed here above.

ATHYS, a limited liability company with capital of €7,622.45, registered with the Trade and Companies Register of Paris under the number RCS 410 723 886, having its registered office at 82 Boulevard de Clichy - 75018 Paris, as a subsidiary of the Moulin Rouge, is the recipient and sole party responsible for processing the Personal Data of Users wishing to apply as an artist or dancer.

Within the limits of their respective duties, the following parties may have access to all or part of the Personal Data:

- the teams in charge of developing the Websites, and promoting the commercial products and services of the Moulin Rouge;
- the teams in charge of auditing (auditor, teams responsible for internal audit procedures...);
- the subsidiaries and affiliates of the Moulin Rouge in charge of managing all or part of the services offered by the Websites, including recruitment activities;
- the subcontractors in charge of providing the technical services related to the administration, maintenance and hosting of the Websites, in compliance the national and European provisions applicable regarding the personal data protection;
- the subcontractors in charge of ensuring the secure online payment services, in compliance with the provisions of the the national and European provisions applicable regarding the personal data protection;
- organisations, court officials and ministerial officers.

5. Storing and security of the personal data

5.1 Personal Data Retention

The Personal Data is generally stored for as long as it is strictly necessary for managing the relationship between the Moulin Rouge and the Users. The durations of the personal data retention depend on the purposes for which the data are collected and processed.

The Personal Data is stored by the Moulin Rouge throughout the effective period of use of the Websites by the User and, where applicable, for a maximum period of 3 years from the User's last login to his account.

At the end of this 3-year period, the Moulin Rouge may contact the User again to see if he wants to keep his account and continue to receive information related to the activities of the Moulin Rouge. In the absence of an explicit and positive response from the User, his Personal Data will be deleted or anonymized according to the provisions in force.

Personal Data which enables establishing proof of a purchase or reservation may, however, be archived in accordance with the provisions in force (in particular that provided under the Commercial Code, the Civil Code and the Consumer Code).

Personal Data relating to recruitment activities (tabs "CASTING ATTRACTIONS" and "DANCER AUDITIONS") is stored for a period of 5 years from the last contact with the candidate.

All processing operations that may be initiated by Bal du Moulin Rouge is summarized in the table hereafter :

Processing operations of personal data table					
Purposes	Collected data and collection method	Data controller	Legal basis of the processing	Duration of retention	Recipients
Management of the registrations and sending of the newsletter	<ul style="list-style-type: none"> Email address, year of birth, gender, country, postal code, according to the information available on https://www.moulinrougestore.com/newsletter and on the http://www.moulinrouge.fr/page_newsletter Last name, surname, email address, password according to the information available on https://www.moulinrougestore.com/customer/account/create/ <p>Collection made by the mean of a form on the official websites of Moulin Rouge.</p>	Bal du Moulin Rouge	Consent of the persons concerned formalized by the sending of the registration and by the acceptance of the GTCU and the privacy policy.	The data are stored during three years from the moment of their collection or the last contact.	<ul style="list-style-type: none"> Marketing service of Bal du Moulin Rouge The data processor in charge of the processing of registrations and sending of newsletters.
Contact – further information to clients / Moulin Rouge official websites’ visitors, notably on the chatbot	<ul style="list-style-type: none"> Conversations content between the client / visitor of the website www.moulinrouge.fr and the reservations agent processing the request IP address of the client/visitor, civil status, identity, number of conversations, answers to the satisfaction survey <p>Collection processed on the chatbot available on the pages of the website www.moulinrouge.fr</p>	Bal du Moulin Rouge	Consent of the persons concerned.	<ul style="list-style-type: none"> The data of the chatbot are stored during three years from the moment of their collection or the last contact. Video/cal/sms: data are stored during 12 months into an active base. Semi-current archives: five years Other data (number of consulted pages, date 	<ul style="list-style-type: none"> Strategic Marketing service Reservation service The data processor delivering the chatbot service (iAdvize)

Processing operations of personal data table					
Purposes	Collected data and collection method	Data controller	Legal basis of the processing	Duration of retention	Recipients
				and hour of the session, navigator language, ID of the website, duration of the navigation, etc) are stored one day by the data processor, or twelve months for the visits' number on the website or the unique ID of the client/visitor.	
Recruitment: Dancer auditions / casting attractions	Last name, surname, email address, phone number, photos and/or videos provided by the applicant Collection made by the mean of a form on the website www.moulinrouge.fr	Athys	Consent of the User formalized by the application and the acceptance of the privacy policy and the GTCU	The data are stored for the necessary duration of the processing of the application and for five years from the last contact.	<ul style="list-style-type: none"> - The human resources service of the company Athys (company in charge of the recruitment of the dancers - The artistic direction service
Account – Creation of an account on the eshop Moulin Rouge	Last name, surname, email address, password Collection made by the mean of a form on the website www.moulinrougestore.com	Bal du Moulin Rouge	Consent formalized by the acceptance of the GTCU, the GTCS and the privacy policy.	The data are stored during three years from their collection or the last contact.	<ul style="list-style-type: none"> - The data processor managing the backoffice of the website www.moulinrougestore.com

Processing operations of personal data table					
Purposes	Collected data and collection method	Data controller	Legal basis of the processing	Duration of retention	Recipients
Order – order of products on the Moulin Rouge eshop	<ul style="list-style-type: none"> - Last name, surname, email address, postal address, phone number - Data regarding the transaction, the follow-up of the commercial relationship, etc... <p>Collection processed during the order on www.moulinrougestore.com</p>	Bal du Moulin Rouge	Implementation of the contract	As financial records and supporting documents, the data are stored during ten years.	<ul style="list-style-type: none"> - Strategic Marketing service - The data processor managing the orders (payment platform) - The data processor managing the backoffice of the website www.moulinrougestore.com - Logistics officer
Reservation – reservations management through the official website of the Moulin Rouge	<ul style="list-style-type: none"> - Civility, last name, surname, company, postal address, email address, phone number - Data related to the transaction <p>Collection made by the mean of a form available on the reservation website of the Moulin Rouge www.moulinrouge.fr/reservations</p>	Bal du Moulin Rouge	Implementation of the contract	As financial records and supporting documents, the data are stored during ten years.	<ul style="list-style-type: none"> - Reservation service - IT service
Statistics of audience measurement	<p>Data stored in the terminal of the Users (the Cookies for instance) or any other element used to identify the users and track the users (web analytic tool).</p> <p>Collection processed on the official websites of the Moulin Rouge through the cookies</p>	Bal du Moulin Rouge	User's consent formalized by the acceptance of cookies via a banner	The data are stored by default on the web analytic tool during 24 months from the moment of collection of the consent.	<ul style="list-style-type: none"> - Strategic Marketing service - Google Inc. - The data processor managing the web analytic tool

5.2 Security measures

The Moulin Rouge, and, where applicable, all of its subsidiaries and affiliates, undertakes to provide all appropriate measures to ensure the confidentiality and security of the Personal Data, and to protect it against any loss, misuse, unauthorised disclosure, alteration or destruction.

The computer systems used for the storing of Personal Data are equipped with a software protection system. Physical and electronic procedures are implemented for backing up the data collected from the Websites, in accordance with the French and European laws in force on the protection of Personal Data.

The employees of the Moulin Rouge, and, where applicable, subsidiaries and affiliates, who, because of their position, have access to the Personal Data, undertake to maintain the utmost confidentiality in this respect.

The personal account of each User can only be accessed by using the login ID, such that only the User has access to the Personal Data contained in his profile. The Moulin Rouge reminds the User that these logins IDs are personal and confidential, and that the User is solely responsible for their use and their disclosure to third parties.

For all practical purposes, the Moulin Rouge recommends that the User log out of his account and close the browser window after finishing his session on the Websites.

The Moulin Rouge has entrusted its payment system to a company specialised in secure online payments, which guarantees total confidentiality of the User's bank information, secured by SSL protocol which systematically controls the validity of access rights when the User pays by credit card and encrypts all transactions in order to guarantee their confidentiality.

6. Rights of users

In accordance with the regulations in force, the Users shall at all times have the right to access, rectify, delete or oppose personal data concerning them and limit the processing of their personal data.

The Users have the right to ask, as soon as possible, for the deletion of their personal data collected when the User was under age at the moment of the collection.

The Users have the right to withdraw their consent at any time for parts of the processing made by the Moulin Rouge based on this consent.

The Users have the opportunity to ask for the transfer of all the personal data in a structured format in which case they would wish to transfer them to another data controller.

The Users can, à any time, modify and revoke directives related to the retention, the deletion and the communication of personal data concerning them after their death.

The Users are informed that the Moulin Rouge do not use an automated processing for the personal data, including the profiling, neither to the transfer of their personal data outside of the European Union territory.

To exercise this right and to obtain communication of the information, the User must simply send his request for such information to the Moulin Rouge. In order for the Moulin Rouge to be able to honour the User's request, the User must send it the information necessary to formally identify him,

including his name, address and email address, by email sent to the following address: information@moulinrouge.fr or by ordinary mail to the following address:

Bal du Moulin Rouge
RGPD Service
82 Boulevard de Clichy
75018 Paris

Any questions regarding the processing of the candidates' (dancers, artists) Personal Data can also be made in the same conditions, addressed to ATHYS, a subsidiary of Moulin Rouge, by sending an email to the following address: athys@moulinrouge.fr or by ordinary mail to the following address:

ATHYS
Human Resources
82 Boulevard de Clichy
75018 Paris

WARNING: due to material and technical constraints, the processing times for requests from Users will inevitably be increased if the request is made by mail.

7. Specific information regarding the use of cookies

7.1 As part of operating the Websites, the Moulin Rouge may have to install cookies on the hard drive of the User's computer (i.e. a file containing information on the User's browsing activity on the pages of the Websites). It could be cookies enabling to identify the User but recording a certain amount of information necessary for the User to browse the Websites (browser language, the date and time of visit, pages viewed, etc.) or Google Analytics cookies enabling to identify the User (geographic information by way of the IP address). On subsequent visits by the User on the Websites, the Moulin Rouge will be able to read the cookies installed particularly in order to allow and/or facilitate the User's browsing experience on the Websites.

7.2 At the time of his first visit on any of the Websites, the User is informed of the Privacy Policy and must consent to the installation of different cookies.

The User's consent is required on the initial visit to each of the Websites run by the Moulin Rouge.

7.3 Functional cookies: To facilitate the use of the features of the Websites, the Moulin Rouge employs purely technical cookies, such as:

- persistent cookies to customize the User's interface;
- "shopping cart" cookies for the e-commerce websites www.moulinrouge.fr and www.moulinrougestore.com;
- "session ID" cookies for the duration of a session;
- authentication cookies;
- session cookies created by a media player.

For all practical purposes, the Moulin Rouge informs the User that he may also object at any time to the registration of technical cookies on his computer hard drive by properly configuring his browser. Where applicable, use of the Websites may be impaired or even impossible.

For information on how to configure web browsers, the User may consult the browser's help menu. For the most used browsers, consult the following links in particular:

- for Internet Explorer: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies> ;
- for Safari: <http://www.apple.com/legal/privacy/fr-ww/cookies/> ;
- for Chrome: <https://support.google.com/chrome/answer/95647?hl=fr&hlrm=en> ;
- for Firefox: <http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies> ;
- for Opera: <http://help.opera.com/Windows/10.20/fr/cookies.html>

7.4 Social networks: The Moulin Rouge offers the possibility for Users to consult its pages on social medias through redirection buttons (Facebook, Twitter, Pinterest and Instagram).

For such purposes, the social networking plugins provided on the Websites use cookies to track the Users' browsing activity, regardless of whether they are registered with the social networks in question or whether they are connected to their personal account when browsing the Websites. The cookies installed also allow the publishers of the different social networks to target advertising offers on their respective platforms.

As such, the Moulin Rouge has no control over the potential processing of Personal Data by the publishers of the different social network platforms concerned, which remain solely responsible for their own processing, except for processing from the specific parameters settings carried out by the Moulin Rouge on this social medias' platforms, if applicable, for which the Moulin Rouge is joint data controller

The Moulin Rouge therefore encourages the Users to consult the respective general terms and conditions of use and the **privacy policy** of such publishers of social network platforms if they wish to use the social medias redirection buttons available to them.

7.5 Audience measurements: the Moulin Rouge uses, only on the E-commerce Website **www.moulinrougestore.com**, cookies and Google Analytics tracking IDs provided by Google Inc.

The Google Analytics tool enables better understanding the behaviour of the Users by collecting anonymous information and generating reports for statistical analysis purposes and to measure the audience and use of E-commerce websites **www.moulinrougestore.com** and **www.moulinrouge.fr**

In particular, the Moulin Rouge has activated a Google Analytics feature that enables it to obtain reports on the demographics and interests of the Users, in order to provide an appropriate commercial offer that responds to the identified needs of its customers.

The processing of the data generated by the cookies used in Google Analytics may involve the transfer and storage (including temporary) of said data on the servers of Google Inc. located in the United States. As such, the Moulin Rouge has no control over the processing carried out and encourages the User to consult the general terms and conditions of use and the privacy policy of Google Inc. beforehand.

In the case where the User refuses to have data collected by the Google Analytics tool, he can disable the Google Analytics advertising features, including through the ads settings, the ads settings for mobile or any other means available (e.g. via the deactivation page of the Network Advertising Initiative or NAI).

The User also has the option of downloading and installing the add-on module to deactivate all the features of Google Analytics, which is made available to the public by Google Inc. at the following URL: <https://support.google.com/analytics/answer/181881?hl=fr>

7.6 If the User agrees to it, the Moulin Rouge may use cookies of a directly commercial nature, on an ad hoc basis during web marketing campaigns.

7.7 Pursuant to the laws in force and the recommendations of the French Data Protection Authority, these cookies are stored in the User's hard drive for not more than 24 months after the moment when they were first placed on the User's terminal.

8. Moulin Rouge's accounts on social networks

To promote its activities and share news of its review with the general public, the Moulin Rouge has a personal account on various social media networks (Facebook, Twitter, Pinterest and Instagram). The User can access, monitor and comment on current events about the Moulin Rouge, in accordance with the General Terms and Conditions of Use and the Personal Data Policy in force on these social networks.

The User thus acknowledges that it is his responsibility to read beforehand the conditions in force for accessing, following and sharing on these social networks. The Moulin Rouge shall not be liable for the processing of personal data by the publishers of these social networks, except for processing from the specific parameters settings carried out by the Moulin Rouge on this social medias' platforms, if applicable, for which the Moulin Rouge is joint data controller.

9. Revision of the Privacy Policy

The Moulin Rouge may revise the Privacy Policy in response to changes in the laws in force as well as changes in its business.

Users will be notified, within a reasonable time, of any substantial change to the Privacy Policy, prior to the entry into force of such new terms.