

# Privacy Policy

Essilor Hong Kong Limited respects the confidentiality of your Personal Data.

This Privacy Policy applies solely to information collected through the <https://www.essilor.com/hk-zh/> Website (the “**Website**”).

The purpose of this Privacy Policy is to inform you (the “**User**” or “**you**“) of how **Essilor Hong Kong Limited**, including its branches, associate offices and affiliates (“**us**”, “**We**”, “**Essilor Hong Kong**”) collects, uses and discloses Personal Data which is subject to the **Personal Data Privacy Ordinance (Ca. 486) (“PDPO”)** of Hong Kong.

## 1. Definition

“**Personal Data**”, as defined in the PDPO means any data, (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.

## 2. Conditional Use of This Website

By accessing and using this Website and its contents, you agree and consent without any limitation or qualification to Essilor Hong Kong collecting, using and disclosing your Personal Data in accordance with the provisions contained in this Privacy Policy, subject to applicable laws.

## 3. Terms of Use

Your use of this Website and its contents is also subject to the Terms of Use available at: <https://www.essilor.com/hk-zh/>

## 4. Collection of your Personal Data

By registering on the Website, requesting information, submitting comments or participating in some game, promotion, etc, we may collect Personal Data.

Generally, Essilor Hong Kong may collect Personal Data in various ways about you through this Website only when you voluntarily submit Personal Data, including:

- in the course of your engaging our services, or you providing documentation or information to us;
- when you communicate or interact with us via telephone, letters, fax, face-to-face meetings, our Website, emails or any other modes of contact;
- CCTV recordings while you are within our premises;
- when you attend a seminar or any other event organized and/or hosted by us;
- when you request that you be included in our emails or any other mailing list;
- when you submit an employment application or provide documents or information such as your resume, from recruitment agencies or employment references;
- from public information sources, search services and other third parties; and
- when you submit your Personal Data to us for any other reason or any other feature of the Website.

If you do not wish your personal information to be collected, please do not submit it. If you provide Essilor Hong Kong with any Personal Data relating to a third party, by submitting such Personal Data to us, you also represent to us and must ensure that you have obtained the consent and have notified such third party of the terms of this Privacy Policy.

## **5. Use of your Personal Data**

We may use your Personal Data:

- To respond to your questions and requests, to provide you with access to certain areas and features and to communicate with you about your activities on this Website.
- To share it with our related and associated companies (“Related Parties”) as required to perform functions on our behalf in connection with the Website (such as administration of the Website, promotions, marketing, data analysis, customer services, or other features on it);
- To provide you with product information or promotional and other offers from us or our Related Parties, so as to improve our services and communications to you;

- For other purposes set out when your Personal Data is collected or in any additional terms and conditions applicable to the particular features of the Website;
- For disclosures required by law, regulatory authorities or court orders;
- For the purpose of or in connection with legal proceedings or necessary for the establishment, exercise or defense of any legal or equitable claim; and
- In an emergency to protect the health or safety of the Website Users, the general public or in the interests of national security;
- For managing the security of our premises, facilities and technology infrastructure;
- For any other purpose relating to any of the above as we deem fit, provided that such use shall not be contrary to any law or regulation in force.

## **6. Disclosing your Personal Data**

Essilor Hong Kong respects the confidentiality of your Personal Data.

In that regard, Essilor Hong Kong shall not disclose your Personal Data to any third party without first obtaining your consent permitting us to do so. Where we disclose your Personal Data to third party with your prior consent, we will employ our best efforts to require that such third party protects your Personal Data.

However, please note that we may disclose your Personal Data to third parties without first obtaining your consent for the situations permitted under the PDPO.

Following your consent, Essilor Hong Kong may disclose Personal Data:

- to Related Parties or third parties who provide operational or administrative services, such as courier services, telecommunications, information technology, payment, payroll processing, training, market research, storage, archival, client support services;
- to any relevant authorities, including professional regulatory bodies and/or law enforcement agencies, whether local or overseas;
- to the extent necessary to comply with any laws, regulations, rules, directions, guidelines and other similar requirements;

- where permitted under law, for external business and charity partners in relation to Essilor Hong Kong's promotional events and seminars; and
- to any other third party to whom you authorize us to disclose your Personal Data.

You further understand, acknowledge and agree that where you have requested and given consent to Essilor Hong Kong transmitting your Personal Data outside of Hong Kong, your Personal Data may therefore be exported to, processed and accessed in countries whose laws provide a different level of protection, which may not necessarily be comparable to that provided in Hong Kong.

## **7. Collection of additional information**

When you browse and use our Website, you generally do so anonymously and we do not at our Website automatically collect Personal Data, including your email address unless directly provided by you.

You may however wish to note the following:

- Your IP Address

An IP address is a number that is automatically assigned to your computer when you are connected to the Internet.

When you visit our Website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server and to administer our Website.

From your IP address, we may identify the general geographic area from which you are accessing our Website; however, we will not be able to pinpoint the exact geographic location from which you are accessing our Website.

Generally we do not link your IP address to anything that will enable us to identify you unless it is required by applicable laws and regulations.

- Cookies

A cookie is an element of data that a website can store on your computer.

We use cookies in some parts of our Website to store user preferences and record session information and other technical information. This may also be used to help personalize services on our Website. Such information may include your type of

Internet Browser or computer, the domain name of your internet service provider, the number of page visits and the character and duration of such visits.

Please note that we track the number of visitors to our Website.

Any material or information collected in this manner shall be deemed non-confidential and non-proprietary and we (or our designees) will be entitled to use any or all of the material in any manner without compensation to you, subject to applicable laws.

Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your Internet browser. However, your ability to use our Website or any features contained on our Website may be affected thereof.

Please refer to your Internet browser documentation to check if cookies have been enabled on your computer or for adjusting your Internet browser settings so as not to receive cookies.

## **8. Security of your Personal Data**

Essilor Hong Kong takes all practical steps to ensure that your Personal Data is accurate and complete if your Personal Data is likely to be used by Essilor Hong Kong to make a decision that affects you, or disclosed to any third party. However, Essilor Hong Kong shall not be responsible for inaccurate or incomplete Personal Data arising from your omission and failure to update us of any changes in your Personal Data that you had initially provided to Essilor Hong Kong.

Essilor Hong Kong shall put in place measures such that your Personal Data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served; and (ii) such retention is no longer necessary for any other legal or business purposes.

Essilor Hong Kong shall take all practical steps to prevent any unauthorized or accidental access, processing, erasure, loss or use of your Personal Data.

However, subject to the fullest extent permitted by law, Essilor Hong Kong disclaims any and all liability and responsibility for any damages you may suffer due to any loss, unauthorized access, misuse or alteration by any third party of any Personal Data you submit to this Website, which are wholly attributable to factors beyond our

control.

## **9. Hyperlinks and Third Party Websites**

Our Website may contain hyperlinks to other websites that are operated by third parties with different Personal Data handling practices and privacy policies.

The use of hyperlinks and access to third party websites are solely and entirely at your own risk and Essilor Hong Kong shall not be responsible for the contents, products, services or privacy policies relating to such third party website, as well as for any damages or loss arising from the access to those third party websites.

It is up to the User to independently assess and to review the privacy policies of the websites linked from our Website.

## **10. Withdrawal of Consent, Access and Correction of your Personal Data**

If you, at any time:

(a) have any questions or feedback relating to your Personal Data or our Privacy Policy;

(b) would like to withdraw your consent to any use of your Personal Data as set out in this Privacy Policy; or

(c) would like to obtain access and make corrections to your Personal Data records; Please contact Essilor Hong Kong under the following:

<https://www.essilor.com/hk-zh/>

Please indicate in the subject header what is the nature of your query (e.g. If it is relating to an access request, you may insert the words "PDPO Access Request" in the subject header).

## **11. Jurisdiction**

All matters relating to the Website including the Privacy Policy are governed by the laws of Hong Kong and any dispute, controversy, difference or claim arising out of or relating to the Website, including the Privacy Policy, including the existence, validity, interpretation, performance, breach or termination thereof or any dispute regarding non-contractual obligations arising out of or relating to it shall be referred to and finally resolved by arbitration administered by the Hong Kong International Arbitration Centre (HKIAC) under the HKIAC Administered Arbitration Rules in force

when the Notice of Arbitration is submitted. The law of this arbitration clause shall be Hong Kong law, the seat of arbitration shall be Hong Kong. The number of arbitrators shall be one. The arbitration proceedings shall be conducted in English. Users accessing the Website from locations other than in Hong Kong must ensure that they are complying with locally applicable laws.

## **12. Transfer of assets**

During the course of its business, Essilor Hong Kong may sell or purchase assets. If another entity acquires Essilor Hong Kong or all or substantially all of our assets, Personal Data and non-personally identifiable information we have collected about the Users of the Website may be transferred to such entity. In the event any bankruptcy or reorganization proceeding is brought by or against Essilor Hong Kong, such Personal Data or information collected on our Website may be considered an asset of Essilor Hong Kong and may be sold or transferred to third parties.

## **13. Severability**

If for any reason, any provision herein is found void or unenforceable, it will be severed to the extent void or unenforceable and the remaining provisions will continue in full force and effect.

## **14. Changes**

As part of Essilor Hong Kong's efforts to ensure that it properly manages, protects and processes your Personal Data, Essilor Hong Kong reserves the right to amend the terms of this Privacy Policy as well as its Terms of Use and any other information contained on this Website, at any time and at its absolute discretion.

You are encouraged to visit Essilor Hong Kong's Website from time to time to ensure that you are well informed of our latest policies in relation to Personal Data protection.

By continuing to interact with us, you agree to be bound by the prevailing terms of this Privacy Policy, as so updated from time to time.

Any amended Privacy Policy will be posted on our Website.