

Your personal data means any information relating to you, in particular your name and contact details such as your home address, your telephone number or your email address. Please take the time to read this Privacy Notice carefully. It is very important that you fully understand how we process your personal data and how we protect your privacy. If you have any questions regarding our use of your personal data, you can of course contact us using the contact details provided below.

Our contact details are:

- Essilor Ltd
- Cooper Road
- Thornbury
- BS35 3UW, UK

The contact details of our Data Protection Officer are:

- dp-request@essilor.co.uk

WHAT PERSONAL DATA WE COLLECT

DATA WE COLLECT WHEN YOU VISIT OUR WEBSITE

When you access our website <https://www.essilor.com/uk-en/>, we automatically collect and store some of your data in our server logs and in cookies, which are small files we send to your computer when you visit our website.

This data does not allow us to identify you directly. However, we do record data related to your browsing on our website, such as the pages that you accessed, the date and time you accessed these pages, your search queries, information on your device (hardware model, operating system version, unique device identifier, Internet protocol address, hardware settings, browser type, browser language), the date and time of your request and referral URL.

The provision of your personal data is not required if you only want to visit our website. This means that you may refuse to accept cookies by configuring your web browser accordingly (for more information, refer to the 'help' section of your web browser). However, refusing cookies is likely to disrupt your navigation on our website, in particular by preventing you from accessing certain parts of it.

DATA WE COLLECT WHEN YOU SIGN UP OR WHEN YOU ORDER PRODUCTS

Some of the services offered on our website require you to sign up. If you want to use these services, we will ask you to provide us with personal data. Please provide us with complete and accurate data, and also inform us if your data needs to be updated. If you do not provide us with complete and accurate data, or if you do not inform us that your data needs to be updated, we may not be able to provide you with the services you requested.

WE COLLECT THE FOLLOWING CATEGORIES OF YOUR PERSONAL DATA:

Identity Data includes First name, Last name, Username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, passwords browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Profile Data includes your username and password, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

HOW WE USE PERSONAL DATA WE COLLECT

We only use your personal data within the limits authorised by the laws and regulations. Sometimes, we may use your personal data because the laws and regulations require us to do so. In any case, we do not make any automated decisions based solely on automatic processing which may produce legal effects on you, or similarly significantly affect you.

We use your personal data for the following purposes:

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING THE BASIS OF LEGITIMATE INTEREST
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Business User	(a) Identity (b) Contact	Consent
To register you and your stores as a new beneficiary of the appointment tool		
Customer	(a) Identity (b) Contact	Contract for performance of a service and consent
To register you and enable you to make an appointment with the Business User and to be able to send you confirmation and information regarding the status of your appointment as well as reminders in relation to said appointments for up to 24 months as from the initial appointment		
To manage our relationship with you which will include:	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Contract for performance of a service and consent (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our
(a) Notifying you about changes to our terms or privacy policy		
(b) Asking you to leave a review or take a survey		

To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage interests (e) Marketing and Communications	(a) consent and contract for performance of a service (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you (f)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications Technical	(a) Consent (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Consent (b) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing

strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity	(a) Consent
	(b) Contact	(b) Necessary for our legitimate
	(c) Technical	interests (to develop our
	(d) Usage	products/services and grow our
	(e) P r o f i l e b u s i n e s s)	
	(f) Marketing and Communications	

HOW LONG WE KEEP PERSONAL DATA WE COLLECT

The period for which we store your personal data is shown in the table below:

PURPOSE/ACTIVITY	TYPE OF DATA	DATA RETENTION PERIOD
Business User	(a) Identity	Business contract length
To register you and your stores as a new beneficiary of the appointment tool	(b) Contact	
Customer	(a) Identity	36 months
To register you and enable you to make an appointment with the Business User and to be able to send you confirmation and information	(b) Contact	

regarding the status of your appointment as well as reminders in relation to said appointments for up to 24 months as from the initial appointment

To manage our relationship with you which will include:

(a) Notifying you about changes to our terms or privacy policy

(b) Asking you to leave a review or take a survey

(a) Identity
(b) Contact
(c) Profile
(d) Marketing and Communications

36 months

To enable you to complete a survey

(a) Identity
(b) Contact
(c) Profile
(d) Usage
(e) Marketing and Communications

36 months

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(a) Identity
(b) Contact
(c) Technical

36 months

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	36 months
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To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	36 months
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To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e)Profile (f) Marketing and Communications	36 months
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PERSONAL DATA WE SHARE

Please note that we may share your personal data with companies, ECP's partners, organisations, public authorities or individuals outside of Essilor Ltd. If some of the recipients are outside the EU/EEA: some of the recipients of the data are located in countries outside the European Union/European Economic Area.

CATEGORY OF DATA	CATEGORY OF	LOCATION
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RECIPIENTS

Identification data		United Kingdom: Essilor Ltd, Cooper
Contact data	Business Users	Road, Thornbury, BS35 3UW Bristol,
Technical data	Customers	United Kingdom.
Usage data		
Profile data		Registration number: 852410
Marketing and communications		

Identification data	Business Users	Essilor Shared Services Philippines
Contact data	Customers	Inc, Filivest City, 17/F Capella
Profile data		Building, ASEAN Or, Alabang,
		Muntinlupa, Metro Manila,
		Philippines.

HOW WE PROTECT PERSONAL DATA

We have measures in place to protect your personal data against unauthorized access, use, or disclosure including, without limitation, the following measures:

- We implement and maintain sophisticated technical measures to ensure that your personal data is recorded and processed in complete confidentiality and security.
- We implement and maintain appropriate restrictions on access to your personal data, and on monitoring the access, use, and transfer of personal data.
- All of our employees who have access to your personal data are required to enter into non-disclosure or similar agreements, which imposes obligations on them to comply with our data privacy and confidentiality requirements.
- We require any business partners and third-party service providers with whom we may share your personal data to comply with any applicable data privacy and confidentiality requirements.

- We provide data privacy training on a regular basis to our employees and third parties who have access to personal data.

WHAT RIGHTS YOU HAVE

Under applicable data protection laws and regulations, you have the right to:

- Access, rectify, and/or erase your personal data
- Restrict or object to its processing
- Tell us that you do not wish to receive marketing information
- In some circumstances, require certain of your personal data to be transferred to you or a third party
- To the extent our processing of your personal data is based upon your consent, withdraw your consent, without affecting the lawfulness of our processing based on your consent before its withdrawal.

We are committed to enabling you to exercise your rights and, to do so, you can contact us using the contact information set out at the beginning of this Privacy Notice. Please provide us with the following information, so that we can act on your request with all due consideration:

- Your name and surname
- Your specific request (in other words, what rights you want to exercise)
- The date of the application and your signature (if you send your application by post)

If you are not fully satisfied with our response, you can also complain about our processing of your personal data to the relevant data protection authority.

CHANGES TO THIS PRIVACY NOTICE

We regularly review our compliance with our Privacy Notice, in particular, to ensure that it complies with new laws and regulations regarding data protection. But, although this Privacy Notice may change from time to time, we will not reduce your rights under this Privacy Notice without your explicit consent.

Privacy policy

Under this Privacy policy notice, we, Essilor Ltd, inform you what personal data of yours we collect, why we collect it, and what we do with it.

Download our privacy policy notice

[Essilor UK_Privacy policy notice.pdf \(194.78kB\)](#)

WELCOME TO ESSILOR LTD's BOOKING PLATFORM PRIVACY POLICY

Essilor Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. This privacy policy is provided in a layered format. Alternatively, you can download a .PDF version of the policy [here](#).

Privacy policy: booking platform

Download our booking platform privacy policy notice

[Essilor UK_Booking platform privacy policy notice.pdf \(391.14kB\)](#)

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy:

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
3. HOW IS YOUR PERSONAL DATA COLLECTED?
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. DATA RETENTION
9. YOUR LEGAL RIGHTS
10. GLOSSARY

1. IMPORTANT INFORMATION AND WHO WE ARE PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Essilor Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you :

For Eye Care Professionals (« ECPs ») :

- Set up an account to benefit from the appointment service made available to you through the Company's store locator;

For consumers:

- Set up an account to make an appointment with an Eye Care Professional. This website is not intended for children (below 16 years of age) and we do not knowingly collect data relating to children. Appointment made for children may only be made by a responsible adult under his/her name.

IDENTITY AND DIRECTIONS OF THE CONTROLLER

Legal reminder: the controller is the person who determined the means and purpose of the processing. The processor is a person collecting personal data for the use of the controller. The processor acts under the authority and control of the controller and on the basis of its instructions.

The controller for the personal data is :

1. For the personal data collected while the consumer/final user is taking the appointment with the business user in their agenda: the business user with whom the consumer is booking the appointment in their agenda. Essilor Ltd acts as processor and upon instruction of the business user
2. For the personal data from the consumer in the setting up of its account or while navigating on the website and in the creation of statistics on the use of the tool, their computation and anonymisation: Essilor Ltd, Cooper Road, Thornbury, BS35 3UW, UK.

Whether it is a controller or a processor, Essilor Ltd takes appropriate measures to ensure the protection and confidentiality of the Personal Data it holds or processes.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you directly or through the use of cookies which we have grouped together as follows:

DATA COLLECTED AS PROCESSOR:

- Identity Data includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- Contact Data includes email address and telephone numbers.
- Technical Data includes [internet protocol (IP) address, your login data, passwords browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].
- Profile Data includes your username and password, your interests, preferences, feedback and survey responses.

DATA COLLECTED AS CONTROLLER:

- Identity Data includes First name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, your login data, passwords browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your username and password, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for statistical purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Sensitive Category of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services and in particular the appointment module;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - give us feedback or contact us
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

For ECPs:

- Where we need to provide appointment services

For consumers:

- When we need to deliver confirmation or reminders on an appointment

Essilor Ltd processes your personal data to provide and administer services to perform tasks relating to the administration of the appointment platform you are using. This data processing is based on your consent. These services include but are not limited to collecting appointments' requests and ensuring their proper processing. A complete list of these processing purposes can be found in the table in sections 4 and 8 of this Privacy Policy.

Essilor Ltd relies on your consent to process your personal data. You do not have to provide your consent and you can withdraw your consent at any time.

We need your consent in the following cases:

- to be able to send you appointment confirmation emails
- to send you appointment reminder emails
- to send you satisfaction emails after an appointment
- to send you appointment renewal emails
- to send you product marketing emails
- to send you confirmation by SMS and reminders
- for remarketing purposes

If consent is not provided

If you do not provide your consent for Essilor Ltd to process your personal data for a specific service that is offered under the lawful basis of your consent then we might not be able to provide that service to you in full.

The right to withdraw consent

Where Essilor Ltd is relying on your consent to process your personal data, you have the right to withdraw your consent at any time. If you are unsure how to withdraw your consent please contact the following address: dp-request@essilor.co.uk

You can only withdraw your consent for data processing operations for which Essilor Ltd relies on consent to process the data. You have the following different rights regarding the personal data that may be processed:

- you have the right of access to your data
- you have the right to correct your data if it is incorrect
- you have the right to ask for your data to be deleted
- you have the right to ask for a copy of your data to be transferred to another organisation
- you have the right to withdraw your consent at any time
- you have the right to be transferred to another organization
- you have the right to object to your data being processed for a specific purpose
- you have the right to request that the processing of your data be restricted for a certain period of time.

If you wish to exercise your rights please contact the following address: dp-request@essilor.co.uk

Standard policies for processing Data transfers

- Your personal data is shared with other organisations Essilor Ltd has a lawful agreement with to process information on its behalf. We will share your personal data with third parties including service providers.
- If you consent to receive communications and/or marketing material from Essilor Ltd, we will share your personal data with external service providers.
- Your personal data may be used for research or analysis purposes.

- Your personal data may also be used by our auditors to assess our compliance with standards and regulations.
- A full list of these organisations is available below

Exhibit Essilor Affiliates

Exhibit Essilor Affiliates

[Essilor UK_Exhibit Essilor affiliates appointment-tool.pdf](#) (185.21kB)

- Your personal data is shared using secure transfer methods

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING THE BASIS OF LEGITIMATE INTEREST
Business User To register you and your stores as a new beneficiary of the appointment tool	(a) Identity (b) Contact	Consent
Customer	(a) Identity	Contract for performance of a

To register you and enable you to make an appointment with the Business User and to be able to send you confirmation and information regarding the status of your appointment as well as reminders in relation to said appointments for up to 24 months as from the initial appointment	(b) Contact	service and consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (d) Marketing and Communications	(a) Contract for performance of a service and consent (c) Profile(b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) consent and contract for performance of a service (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent

<p>maintenance, support, reporting and hosting of data)</p>		<p>fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) Consent (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>(a) Consent (b) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) P r o f i l e b u s i n e s s) (f) Marketing and Communications</p>	<p>(a) Consent (b) Necessary for our legitimate interests (to develop our products/services and grow our</p>

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by emailing us. You can also manage your email preferences and unsubscribe at any time by clicking unsubscribe at the bottom of our emails.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for [six] years after they cease being customers for [tax] purposes.

PURPOSE/ACTIVITY	TYPE OF DATA	Data retention period
Business User	(a) Identity	Business contract
To register you and your stores as a new beneficiary of the appointment tool	(b) Contact	length

Customer	(a) Identity	24 months after
To register you and enable you to make an appointment with the Business User and to be able to send you confirmation and information regarding the status of your appointment as well as reminders in relation to said appointments for up to 24 months as from the initial appointment	(b) Contact	making an appointment
To manage our relationship with you which will include:	(a) Identity	Time of the contractual
(a) Notifying you about changes to our terms or relationship	(b) Contact	(c) Profile
privacy policy	(d) Marketing and	3 months after the Communications
(b) Asking you to leave a review or take a end of the survey survey		
To enable you to complete a survey	(a) Identity	3 months after the end of the survey
	(b) Contact	
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity	24 months
	(b) Contact	
	(c) Technical	
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising	(a) Identity	24 months
	(b) Contact	
	(c) Profile	

we serve to you

- (d) Usage
- (e) Marketing and Communications
- (f) Technical

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

- (a) Technical 24 months
- (b) Usage

To make suggestions and recommendations to you about goods or services that may be of interest to you

- (a) Identity 24 months
- (b) Contact
- (c) Technical
- (d) Usage
- (e) Profile
- (f) Marketing and Communications

In some circumstances you can ask us to delete your data: see [your legal rights] below for further information.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data. Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of your personal data. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- Request erasure of your personal data. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing your personal data. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the portability of your personal data. Request the portability of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the following address: dp-request@essilor.co.uk.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to. Giving your consent means that is any free, specific, informed and unambiguous manifestation of your will by which you accept, by a declaration or by a clear positive act, that personal data concerning you may be processed.

Public interest mission means that data processing is carried out by public authorities for the purpose of carrying out their tasks.

Safeguarding the vital interests of the person means that the processing is necessary to protect the vital interests of the data subject or of another natural person, in the event that the data subject is physically or legally incapable of giving his consent.

THIRD PARTIES

INTERNAL THIRD PARTIES

Internal Third Parties refer to other companies in the Essilor Group acting as joint controllers or processors and who are based in France and provide IT and system administration services and undertake leadership reporting.

EXTERNAL THIRD PARTIES

External Third Parties refer to :

- Service providers Amazon Web Services acting as processors based in Dublin, Ireland who provide IT and system administration services. Managed by Claranet based in Paris, France.
- Service providers [Salesforce.com](https://www.salesforce.com) acting as processors based in Germany who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom and Ireland who provide consultancy, banking, legal, insurance and accounting services.

- Tax administrations regulators and other authorities acting as processors or joint controllers based the United Kingdom and Ireland who require reporting of processing activities in certain circumstances.

10. ADDITIONAL INFORMATION CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways: Full name of legal entity: Essilor Ltd Email address: dp-request@essilor.co.uk

Postal address: Essilor Ltd, Cooper Road, Thornbury, BS35 3UW, UK You have the right to make a complaint at any time to the Court of England and Wales.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 01/03/2021. Historic versions are archived here OR can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

VIRTUAL MIRROR

Luxottica uses an augmented reality application feature on your device to show you the right fit and look of the frames you select. Any information gathered will be stored on your device and will not be shared nor stored by Luxottica.

FOR USERS IN THE EUROPEAN UNION ("EU")

Under the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or "GDPR"), individuals in the EU are afforded specific rights with respect to their "Personal Data" as defined under the GDPR. For the purposes of this Policy, Luxottica Group S.p.A ("Luxottica," "we," "our," or "us"), with a registered office in Piazzale Luigi Cadorna, 3, 20123 Milan, Italy, operates as a data controller.

We have appointed a Data Protection Officer that can be contacted at the email address: dpo@luxottica.com.

This Policy describes how the websites that link to this Policy (collectively "Sites"), as well as the Face Scanning App ("FSA"), or our in-store Face-Scanning Kiosk ("Kiosk") and certain other technological services aimed at providing you with a customized experience (e.g. Frame Advisor, Size Advisor) as described below (collectively, the "Platforms") collect, use, and generally process data about you.

It is understood that the Virtual Mirror ("VM") experience is excluded from the abovementioned Platforms. The experience does not involve any processing of personal and/or special data (including biometric data), as it takes place exclusively on the user's device in real-time mode. Therefore, to participate in the VM experience, consent to processing is not required and any information uploaded to the user's personal device will not be shared with Luxottica.

1. WHAT KIND OF PERSONAL DATA DO WE USE AND WHERE IS IT COLLECTED FROM?

We process your Personal Data, which is collected directly from you, whether you access the Platform through one of our websites, the mobile application, or an in-store kiosk. The Personal Data you provide is outlined in the categories of personal data listed below:

- i. Personal Data provided during the Platform experience (first and last name, email address, phone number, face shape, face dimensions, and other information directly provided by you);
- ii. Your image that is provided when you take part on the virtual technology features of our Platforms;
- iii. Data derived from your image or from your Biometric Data (face shape, eye color, hair, skin tone);

Hereinafter, point a), b), c) will be referred to as "Personal Data"

iv. "Biometric data" means anything that relates to the measurement of your physical features and characteristics (in particular, your face measurement, starting from your interpupillary distance);

Hereinafter, Personal Data and Biometric Data will be jointly referred to as "Data".

2. FOR WHAT PURPOSES AND WHY DO WE USE YOUR PERSONAL DATA? We

process your Personal Data for the following purposes, based on the following legal basis:

a) The Platforms allow you to use an online service capable of simulating lenses and eyeglasses onto photos. Your image will be uploaded and then, based on the characteristics of your facial shape, the Platforms will provide you recommendations with your image results (the "virtual technology feature"). Such data processing activities are performed to provide you with the products and services required (including any registration of such Personal Data within your online account if you require us to do so). The legal basis for the data processing aforementioned is the execution of a contract pursuant to art. 6 par. 1 lett b). If you do not want your Personal Data to be processed for such purposes, it will not be possible for us to provide the required products and services.

b) To provide you with the services required, we could process your Biometric Data, derived from the scanning of your face through one of our Platforms. Such Platforms will detect your interpupillary distance and consequently derive from it the other facial measurements. Any collection of biometric identifiers and biometric information is for the sole purpose of providing you with the frame suggestions (Suggestions) based on your facial features, assisting you in viewing how certain eyeglasses may look on your face. We will not disclose or disseminate any biometric information to any entity, other than those contracted parties that assist us in providing this service to you.

Biometric data can be processed by us only with your prior explicit consent pursuant to Article 9 par. 2 lett. a) of the GDPR. However, if you do not grant your explicit consent to the processing of your biometric data for this purpose, you will not be able to use the virtual technology feature and you will only be able to access the recommendations based on the answers you provided us with.

c) Except for Biometric Data. We process, with your prior consent, your Personal Data, for the following marketing purposes: (i) to send you the image and the product recommendations via email; (ii) to send commercial and promotional communications and periodical updates through the communication channels you provided us with related to our products, services, Platforms, initiatives, and events.

d) We will process your Personal Data to: (i) exercise or defend legal claims in court proceedings or in an administrative or out-of-court procedures relating to the rights of Luxottica, of its group companies and/or of their representatives, shareholders, officers and directors; (ii) enable the

technical management of the Website and its operational functions, including solving any technical problems, to perform tests, updates and upgrades that cannot be performed through non-personal data; (iii) prevent or identify fraudulent activities or misuses of the Website or against the Luxottica group and/or the users of the Website; (iv) complete a potential merger, sale of assets, transfer of all or a material part of its business, or financing transaction by disclosing and transferring the Personal Data to the third party or parties involved in the transaction as part of the transaction; (v) conduct, surveys and market researches relating to Luxottica's products and services by post, telephone or e-mail; (vi) anonymize Personal Data in order to perform statistical analysis.

3. WHAT MODALITIES DO WE USE TO PROCESS YOUR DATA?

The processing of your Data is carried out electronically and manually, and only within the limits necessary to pursue the purposes outlined above. All Data provided by users is kept on secure servers, adopting adequate security measures to protect Data from non-authorized access, to maintain the accuracy of Data and guarantee their proper use.

4. TO WHOM IS YOUR DATA COMMUNICATED AND WHERE ARE YOUR DATA TRANSFERRED?

Your Data will be accessed by our service providers (hosting and infrastructure service providers, etc). Each service provider will act as a data processor, by virtue of a specific agreement in place per Article 28 of the GDPR. We will process your Personal Data in countries outside the European Union, when necessary to provide you with the services mentioned above and will ensure that the data transfer complies with Article 48 of the GDPR.

This website is currently hosted by Microsoft Azure **US East 2, 101 Herbert Drive Boydton, VA 23917, USA.**

5. HOW LONG IS YOUR PERSONAL DATA RETAINED BY US?

We retain your Data for the time strictly necessary to achieve the purposes for which they was collected and further processed, including any retention period required under applicable laws, including GDPR.

With specific regard to the Biometric Data, they will be deleted within 24 hours from the time of the collection. However, in case you ask us to save your experience, suggestions and/or the image in your

account, we will retain your Biometric Data for six months from the last access or until you delete your take or the online account.

Please understand that when you request your image via email through the virtual technology feature, and you did not previously ask us to save that image into your profile, we will only temporarily store your image to provide your chosen service.

For marketing and profiling purposes, Personal Data will be processed for seven years from the last purchase and/or from the last contract with you (e.g. subscription to a prize competition, participation to an event, opening of a newsletter), notwithstanding the right to withdraw the consent provided or object to the processing at any time.

6. HOW CAN YOU EXERCISE YOUR PRIVACY RIGHTS?

You can exercise any of the following rights, subject to verification of your identity, by submitting a request on <https://privacy.luxottica.com>

- a) **Access:** You may request a copy of the Personal Data our Platform databases currently contain.
- b) **Automated Processing & Decision-Making:** You may request that we stop using your Personal Data for automated processing, such as profiling. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, including withdrawing your consent to the processing of your Personal Data.
- c) **Correction or Rectification:** You may request to correct what Personal Data our Platform databases currently contain. We may not accommodate a request to change Personal Data if we believe the change would violate any law or legal requirement or cause the information to be incorrect. Where applicable, we will ensure such changes are shared with trusted third parties.
- d) **Restrict Processing:** When applicable, you may restrict the processing of your Personal Data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, including withdrawing your consent to the processing of your Personal Data. Where applicable, we will ensure such changes are shared with trusted third parties.
- e) **Object to Processing:** When applicable, you have the right to object to the processing of your Personal Data. When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your Personal Data. Where applicable, we will ensure such changes are shared with trusted third parties.
- f) **Portability:** Upon request and when possible, we can provide you with copies of your Personal Data. When such a request cannot be honoured, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, including withdrawing your consent. Where applicable, we will ensure such changes are shared with any trusted third parties.

g) Withdraw Consent: At any time, you may withdraw your consent to our processing of your Personal Data through the Platforms. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your Personal Data. Where applicable, we will ensure such changes are shared with trusted third parties.

h) Erasure: If you should wish to cease use of our Platforms and have your Personal Data deleted from our Platforms, then you may submit a request. Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your Personal Data has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.

7. HOW CAN YOU CONTACT LUXOTTICA?

The Data Controller of your Personal Data is Luxottica Group S.p.A., with a registered office in Piazzale Luigi Cadorna, 3, 20123 Milan, Italy.

Should you have questions or comments on this Policy, or any data processing carried out by Luxottica, you may contact Luxottica at dpo@luxottica.com.

Last modified: 09/02/2023