Privacy Policy

Protecting your privacy

EssilorLuxottica and its related bodies corporate knows that you care how information about you is used and recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. This Privacy Policy explains how we collect and manage your personal information.

In this Privacy Policy, "Essilor", "we", "our", "us" refers to Essilor Australia PTY LTD (ABN 96 002 659 458), Essilor New Zealand Limited (NZBN 9429037481186), their related bodies corporate, and the ultimate holding company EssilorLuxottica, including related entities that trade under the brand "PSG Eyewear" and "Optical Supply of Australia".

What is your personal information?

The term 'personal information' has the meaning given to it in the applicable privacy laws, for Australia Privacy Act 1988 (Cth) and for New Zealand Privacy Act 2020. In general terms, personal information is any information that can be used to personally identify you. This may include your name, address, telephone number, email address, profession or occupation. If any of the information we collect from you identifies you, or is reasonably capable of identifying you, then it will be considered personal information.

What information do we collect?

- full name;
- business name & registration details such as your ABN or NZBN;
- mailing or street address;
- email address (for example the email address of your business and business representatives);
- telephone number (for example the telephone number of your business and business representatives);
- gender and date of birth;
- details of the products and services you have ordered or purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- your payment details;
- details of the style and preferences associated with orders, such as choices of glasses, lens, frame or other factors relevant to eyewear choice;
- any information that you provide to us directly through any of our websites, mobile apps or indirectly through the use of our websites, mobile apps or online presence, through our representatives or otherwise;

- information you provide to us through our Customer Service team or our Customer Experience Surveys; and
- medical information and medical history about customers, such as the parameters of prescription glasses and information about the health of your Customer's eyes.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect aggregated information about how users use our website.

How we collect your personal information

- when you order or complete a purchase order with us, including online purchases and electronic transmission of orders;
- when you contact us with an enquiry or complaint in relation to our products and services;
- through your registration, access and use of our website or mobile apps; and
- when you apply for a job with us.

We may also collect personal information from third parties including:

- from third party companies such as credit reporting agencies, suppliers, law enforcement agencies and other government entities (such as the Department of Veterans Affairs);
- from data analysis agencies and other commercial partners;
- from employment recruitment agencies;
- from health funds; and
- from our related bodies corporate;

When you use our website or our mobile apps, we may use aggregated, anonymous analytic tracking via a third party to gather information about the way the website or app is used. In some cases we may also collect your personal information through the use of cookies. When you access our website by typing the address in your browser or by clicking on our advertisement on a third party website, we or a third party on our behalf may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register or to log in. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movements, and gather broad demographic information.

We also work with other companies who use tracking technologies, including web beacons, to serve ads on our behalf across the internet. These companies may collect non-personally identifiable information about your visit to our website about your interaction with our mobile app or communications, including advertising and e-mails. If you object to web beacons, we recommend that you follow the instructions for deleting existing cookies and disabling future cookies.

What happens if we cannot collect your personal information?

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to process your order and purchase;
- we may not be able to process any third party discounts or benefits;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions;
- some functions our website or mobile apps may be restricted or not operational; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

For what purposes do we collect, hold, use and disclose your personal information?

- to provide products and services to you and to facilitate the use of any of our websites or apps;
- to answer enquiries and provide information or advice about existing and new products or services;
- to assess the performance of the website and mobile apps and to improve the operation of the website and mobile apps;
- to assess our customer service and to improve our customer service to you;
- to administer any contest, promotion and survey that we may run from time to time (for instance to deliver a prize you may have won in a contest);
- For processing, administering and/or managing your relationship with us (when we manufacture our products, the eye care professionals may need to provide us with your personal data);
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing, marketing research and targeted online advertising), other communications, planning, product or service development, support, quality control, human resources, educational, data analytics and research purposes of Essilor, its related bodies corporate, contractors or service providers;

- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint or enquiry made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

Direct Marketing

If you consent, we may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, advertisements on certain websites and social media, SMS and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (AU) and the Unsolicited Electronic Messages Act 2007 (NZ). You consent to us sending you those direct marketing communications by any of those methods. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below), by using opt-out facilities provided in the marketing communications, by changing your online privacy settings, or by adjusting your social media account settings.

We may also disclose your personal information to our related bodies corporate, our other business partners and our service providers to give you information and offers about products and services offered by us or these companies.

Please note that by opting out of receiving marketing communications, you may still receive communications from us (such as invoices and notices) in relation to the products and services you have purchased from us.

Who we disclose your personal information to?

- our employees, related bodies corporate, contractors or service providers for the purposes of operating our website, mobile apps or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, lens suppliers and manufacturers, web and cloud hosting providers, cyber security service providers, order fulfilment and shipping providers, customer service desk, credit agencies in order to run a credit check on orders, IT systems administrators, mailing houses, insurers, couriers, payment processors, support providers, data entry service providers, data analysts, electronic network administrators, debt collectors, archivists and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- referees whose details are provided to us by job applicants;
- to government and regulatory bodies and law enforcement agencies; and
- any other organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

We also may also share non-personal information, such as the number of users who visited our website during a specific time period or who purchased a specific product through the website, with our marketing partners, advertisers and others from time to time. This information generally is shared in an aggregated form.

Disclosure to overseas recipients

We may disclose your personal information to the persons listed above, including our related bodies corporate and third party suppliers and service providers, government and quasi-government organisations, prospective purchasers of part of or the whole of our business and stock exchanges located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. Disclosure to our related bodies corporate overseas will be governed by an intra-group data transfer agreement.

We may disclose your personal information to entities located outside of Australia and New Zealand, including to entities located in the United States of America, Canada, the United Kingdom, Ireland, Italy, France, Switzerland, Norway, Turkey, Philippines, Thailand, India, China, and EU member states.

We store your personal information securely

We take reasonable steps to ensure we protect any personal information that we hold from misuse, loss and unauthorised access, modification and disclosure.

Your personal information may be stored in hard copy documents and electronically.

We maintain physical and electronic security over our paper and electronic data storage. We also maintain computer and network security. For example, we use firewalls (security measures for the Internet) and other systems such as user identifiers and passwords to control access to computer systems.

If the personal information we collect is no longer needed for any purposes and we are not required by law to retain it, we take reasonable steps to destroy or permanently de-identify it.

In the unlikely event that your personal information is at risk of serious harm caused by a data breach, we will promptly investigate the breach and as soon as practicable after becoming aware that a notifiable privacy breach has occurred notify you, and, for Australia, the Australian Privacy Commissioner or for New Zealand, the Office of the Privacy Commissioner.

How you can access and correct your personal information

We require accurate personal information about you to ensure you receive the best possible service from us. You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge you for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

We take reasonable steps to ensure that your personal information is up-to-date whenever we collect it or use it. This may include, for example, using data obtained from third parties to verify the accuracy of your personal information.

If you find that current personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately using the details below and we will take reasonable steps to correct it.

Complaints

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will investigate your complaint and will advise you of the outcome of our investigations in writing.

If you are not satisfied with our response or wish to make a direct complaint to the regulator, you may contact the applicable Privacy Commissioner in Australia or New Zealand.

In Australia: Office of the Australian Information Commissioner <u>www.oaic.gov.au</u> In New Zealand: Office of the Privacy Commissioner <u>www.privacy.org.nz</u>

Contact us

If you have any questions or concerns about this Privacy Policy, or if you wish to make a complaint regarding your personal information or our handling of it, please use the "Contact Us" link on our website or contact us using the details provided below. We will respond to your inquiry or complaint within a reasonable timeframe, typically within 30 days.

You can contact our Essilor Customer Service team at:

For customers in Australia: **Essilor Australia Pty Ltd** Post: Attn: Privacy Officer, Level 34-36, 1 Denison Street North Sydney NSW 2060 Telephone: 1800 801 399 Email: <u>nsw.cs@essilor.com.au</u>

For customers in New Zealand: **Essilor New Zealand Limited** Post: Attn: Privacy Officer, Level 34-36, 1 Denison Street North Sydney NSW 2060 Telephone: +64 9 970 7400 Email: <u>nzorders@groups.essilor.com</u>

Updates

We reserve the right to make changes to this Privacy Policy, and other related policies posted from time to time. Please review our website periodically to see any updates to the information provided here.

This Privacy Policy was last updated in March 2025.