

PRIVACY NOTICE

(WEBSITE)

Last modified: January 2024

Pursuant to this Privacy Policy, we, ESSILORLUXOTTICA (“We”, “ESSILORLUXOTTICA”), as “Data Controller” inform you of the type of personal data we collect from you when you visit our website or use our services, the purposes for which we collect them and how we use them.

This Privacy Notice is applicable to any **EssilorLuxottica** entities controlled by or under common control of EssilorLuxottica who refer to it in their purchase orders, agreements, or websites.

ESSILORLUXOTTICA group remains responsible for the collection and processing of Personal Data and is the data collector (or, as the case may be, the data processor) of the data it collects and processes.

EssilorLuxottica is a public limited company under French law with its head office located at 1-6 rue Paul Cézanne, 75008 Paris, France, registered in the Créteil Trade and Companies Register under number 712 049 618. It is a global organization with offices and operations throughout the world and most of your Personal Data relating to is stored and processed within a range of global applications that is used globally by the entities of EssilorLuxottica.

The majority of the processing of your personal data is carried out through the concentrated services of two entities: Essilor International and Luxottica Group S.p.A..

Essilor International, a public limited company under French law with its head office located at 1147 rue de Paris, 94220 Charenton-le-Pont, FRANCE, registered in the Créteil Trade and Companies Register under number 439 769 654, as a part of EssilorLuxottica Group.

Luxottica Group S.p.A., a public company under Italian Law, with registered office at Piazzale Cadorna no. 3 – 20123 Milan, Italy, as a part of EssilorLuxottica Group.

This Privacy Notice shall apply to all personal data received by us from our customers or business partners (the “Customer(s)” or “You”) whether relating to our customers, their purchasers, end-consumers and/or other users of our products. By purchasing our products or services, the Customer accepts the terms of this Privacy Notice.

The purpose of this Privacy Policy is to inform you of what personal data we collect, why we collect, use, disclose and process it, during our business relationship, including on our websites, online portals and applications (collectively, “Website(s)”).

Please take the time to read this Privacy Notice carefully, it is very important that you fully understand how we are processing your personal data and how we are protecting your privacy.

DEFINITIONS

The following definitions shall apply in the context and for the purpose of this Privacy notice:

“Personal Data”: which is any data relating to an identified natural person, or a natural person who can be identified, directly or indirectly, through the linking of data, by reference to an identifier such as his or her name, voice, picture, identification number, electronic identifier, geographical location, or one or more physical, physiological, cultural or social characteristics. Personal Data includes Sensitive Personal Data and biometric data.

“Data Subjects”: an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Data Processing”: any action conducted concerning your Personal Data such as, the collection, recording, organization, storage, modification, transfer, deletion, access, consultation, etc. of such data.

“Sensitive Personal Data”: which is as any information that directly or indirectly reveals a person’s race, ethnicity, political or philosophical views, religious beliefs, criminal record, biometric data, or any data related to such person’s health.

"Data Controller": which is anyone who determines the means, methods, standards and purposes of the processing of an individual's Personal Data.

"Data Processor": which is anyone who processes Personal Data on behalf of a Data Controller and under their supervision and instruction.

"Consent": which is the consent by which an individual authorises third parties to process Personal Data relating to him or her. Consent must be clear, simple, specific, unambiguous and accessible. It can be given electronically.

WHAT PERSONAL DATA WE COLLECT

We may collect Personal Data when you purchase our products or services requested by you or to respond and satisfy requests for assistance or information, including pre- and post-sales customer assistance or using or accessing our portal and/or the services contained therein, requesting information, submitting opinions, participating in events, promotions, etc.

We may collect the following categories of your Personal Data:

- **Identification data**, including your name, surname, e-mail address and telephone number (the latter exclusively in the "Store Locator" section, to put you in contact, if you wish, with the optical center of your choice)
- **IT data**, including data relating to your browsing on our website and in particular those processed by the IT tool used or by Google Analytics (for example the pages visited, the date and time of access to these pages, your searches, IP address, date and time of your request and referring URL).
- Information you provide us for scheduling business appointments.

Generally, we may collect Personal Data in various ways about you through this Website only when you voluntarily submit Personal Data.

If you do not wish your personal information to be collected, please do not submit it.

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.

HOW WE USE PERSONAL DATA WE COLLECT

We use your information to communicate with you about our products and services.

We only use your Personal Data within the limits authorized by the laws and regulations.

By providing us with Sensitive Personal Data, you undertake to obtain prior consent from the relevant Data Subjects for processing the data by us.

In any case, we do not make any automated decisions solely on automatic processing which may produce legal consequences concerning you, or which may significantly affect you.

We may share your personal information with our trusted third-party partners who assist us in providing our services to you. We will only share your information to the extent necessary for them to provide their services to us. We require these third-party partners to comply with data protection laws and to implement appropriate security measures to protect your personal information.

Where Personal Data is to be transferred outside of the country, we comply with the applicable data protection laws and ensure that personal data be transferred outside of the country only in accordance with the requirements prescribed under the applicable data protection laws, to ensure that a standard of protection that is comparable to the protection under such laws is provided to the personal data so transferred.

We may disclose your personal information if required by law or to protect our rights, property, or safety, or the rights, property, or safety of others. For example, we may disclose your personal information to law enforcement agencies, regulators, or other government authorities if required by law or if we believe that such disclosure is necessary to comply with a legal obligation or to protect our interests or the interests of others.

We may use your Personal Data to analyse and improve our services, such as by identifying trends in customer preferences or usage patterns. We may also use your information to comply with legal or regulatory requirements, such as tax or export control laws.

We may collect this information from various sources, including when you register for an account, place an order, or communicate with us. We will only be able to collect your personal data if you voluntarily submit the information to us or when it is needed to execute a contract with you.

If you choose not to submit your personal data to us or subsequently withdraw your consent to our use of your personal information, we may not be able to provide you with our services.

You may access, update your personal data submitted to us or withdraw your consent at any time by the contact details provided below.

We thank you for providing us with complete and accurate data, and please do 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 and/or access to our Websites.

We will not be able to distinguish the age of persons who access and use the Website. If a minor (as determined under applicable laws) has provided us with Personal Data without parental or guardian consent, the parent or guardian should contact us to request in writing, the removal of the relevant Personal Data.

HOW LONG WE KEEP PERSONAL DATA WE COLLECT

We will retain your personal information for as long as necessary to provide our services to you and for any legal or regulatory purposes.

PERSONAL DATA WE SHARE

As a global organisation with offices and operations throughout the world, we may transfer Personal Data collected by us on an aggregated or individual level to various divisions, subsidiaries, joint ventures and affiliated companies of the EssilorLuxottica Group around the world located inside or outside the European Economic Area for the Purposes stated above and in accordance with applicable laws, as well as to data processors outside of the EssilorLuxottica Group globally for storage and service purposes.

We may also share your information with companies, organizations, public authorities or individuals outside of the EssilorLuxottica Group (such as hosting providers, IT systems providers, market and analyst service providers, database management and maintenance services), as well as to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

Some of these recipients of the data may be located overseas. Where applicable data protection laws for such countries deems that the level of data protection in such countries is not comparable with the level of data protection in the European Union or under the relevant data protection legislation, we will ensure that personal data be transferred outside of the country only in accordance with the requirements prescribed under the applicable data protection laws, to ensure that a standard of protection that is comparable to the protection under such laws is provided to the personal data so transferred.

HOW WE PROTECT PERSONAL DATA

We have measures in place to protect your Personal Data against unauthorized access, use, or disclosure, including without limitation:

- 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 monitoring of the access, use, and transfer of Personal Data.
- Our personnel or third parties 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 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 following rights:

- Right to be informed: Data subjects have the right to know how their personal data is being collected, processed, and used.
- Right to access: Data subjects have the right to access their personal data held by data controllers.
- Right to rectification: Data subjects have the right to request the correction of inaccurate or incomplete personal data.
- Right to erasure: Data subjects have the right to request the deletion or removal of their personal data under certain circumstances.
- Right to object: Data subjects have the right to object to the processing of their personal data under certain circumstances, such as direct marketing.
- Right to data portability: Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format.
- Right to withdraw consent: Data subjects have the right to withdraw their consent to the processing of their personal data at any time.

In some cases, we may need to retain certain personal information to comply with legal or regulatory requirements, to resolve disputes, or to enforce our agreements. If we are unable to fulfill your request, we will explain the reasons for this and any applicable legal or regulatory obligations.

If you have any questions or concerns about our privacy practices or your personal information, please contact us using the contact details provided below.

If you do not get satisfaction by contacting us, you can also lodge a complaint about our processing of your Personal Data with a data protection authority.

DATA PROTECTION IN ESSILORLUXOTTICA

Data protection compliance in EssilorLuxottica is supported by a network of Data Protection Officers and a Data Protection community headed by the EssilorLuxottica Group Data Protection Officer.

For more information about Data Protection Program and Data Protection Organization, visit the Data Protection intranet or contact the Data Protection Officer.

CONTACT

If you have any question regarding our use of your personal data, you can contact us as set out below:

BAHRAIN:

Essilor Optical Supplies LLC

Dubai , Lens technology Center DIP Plot N° 598-304, United Arab Emirates

Email: customerservice@essilorme.com; privacy@luxottica.com

KUWAIT:

Essilor Trading Co W.L.L.

Al Othman Center, 1st floor, Office 106H
Ibn Khaldoun Street, Hawalli, Kuwait
Email: cskuwait@essilorme.com; privacy@luxottica.com

OMAN

Essilor Optical Muscat

Muscat, Sultanate of Oman. Al Khuwair, Building Number 63
4th Floor, Office Number 41

Email address: cs.oman@essilorme.com; privacy@luxottica.com

QATAR

Essilor Optical Supplies Doha W.L.L.

50 Aamir Bin Rabiah St, Doha, Qatar

Email address: customerservice.qa@essilorme.com; privacy@luxottica.com

NIGERIA/KENYA

Optical Supplies Middle East FZE

36GQ+7R6 - Al Barsha - Al Barsha South - Dubai - United Arab Emirates

Email: cs@essilor.ng; privacy@luxottica.com

OTHER COUNTRIES:

Email: privacy@luxottica.com; privacy@essilorluxottica.com