

EssilorLuxottica Events Privacy Notice

EssilorLuxottica and your Personal Data
Understanding why and how EssilorLuxottica processes your Personal Data

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Content

At EssilorLuxottica, we are committed to protecting the Personal Data of our stakeholders, including that of our customers, prospects and business partners. Upholding this commitment is essential to our success and reputation, and ultimately to our ability to fulfil our mission of helping people to **see more and be more**.

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1. INTRODUCTION

Within the EssilorLuxottica Group, different types of events (including events such as the “EssilorLuxottica Days”, scientific congresses, promotional or public relations events, etc. – hereinafter the **“Event(s)”**) can be organized for the benefit of any its Affiliates, notably Luxottica Group S.p.A. Such Events are mainly addressed to you as our customer, or prospects or, more in general, professional business partner of our different Affiliates (hereinafter, **“Data Subjects”**, **“you”**, **“your”**, **“yours”**).

In order to organize these Events and your participation to them, your Personal Data is processed.

Pursuant to the GDPR as well as any other local and/or EU laws applicable in the data protection field, this Privacy Notice intends to inform you about how your Personal Data is collected, used, shared and secured for the purposes of the Events. It also describes your rights regarding how your Personal Data is used.

1.1 Who is the Controller of your personal Data?

For the purposes of this Privacy Notice, the Affiliate in which favor the Event is organized and specified in the invitation email that was sent to you (hereinafter **“EssilorLuxottica Entity”**) will act as Data Controller over your Personal Data.

For certain specific Purposes, the EssilorLuxottica Entity may act as Joint Controller with Luxottica Group S.p.A., with registered office at Piazzale Cadorna 3, 20123, Milan, Italy, Company registration number 10182640150, acting as Event organizer (hereinafter **“Luxottica”**). This means that, in such cases, the EssilorLuxottica Entity and Luxottica are jointly responsible for deciding on the Purposes and the means of the Processing of your Personal Data.

Further in this Privacy Notice, EssilorLuxottica Entity and Luxottica may be hereinafter also jointly or independently referred to as **“EssilorLuxottica”** or **“we”** or **“us”** or **“our”**.

For the purposes of sharing your Personal Data, we have conducted a balancing test and determined that our legitimate interests do not override your interests, rights, or freedoms because:

- (a) Data Processing is limited to professional contact information;
- (b) there is a reasonable expectation of receiving such communications in a business context;
- (c) we provide easy opt-out mechanisms;
- (d) the processing benefits you by providing information about relevant Events.

Thus, we entered into an intra-group Data Sharing Agreement in accordance with our legitimate business purpose.

1.2 What is this Privacy Notice about? Key definitions

In this Privacy Notice, the following words and expressions have the following meaning:

Affiliate(s)	Any legal entity that, directly or indirectly, controls, is controlled by, or is under the common control of EssilorLuxottica S.A. (as the ultimate holding company of the EssilorLuxottica Group), where “control” means the ownership, direct or indirect, of at least 50% of the share capital or voting rights in such a legal entity
Data Controller	The natural or legal person, department or organisation which, alone or jointly with others, determines the Purposes and means of the Processing of Personal Data
Data Processor	The natural or legal person, department or other body which processes Personal Data on behalf of and on the instructions of the Data Controller
EssilorLuxottica Group (or, simply, Group)	EssilorLuxottica as global organization, i.e. jointly EssilorLuxottica (as ultimate holding company) and all its Affiliates
GDPR	The Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (the “General Data Protection Regulation”)
Joint Controllers	The party which, together with others, decides about Purposes and means for the Processing of Personal Data. So, we speak about Joint-Controllershship over Personal Data, when two or more data controllers jointly determine Purposes and means of the Processing.

Personal Data (or simply Data)	Any information about an individual (Data Subject(s)) from which that person can be identified (e.g., name, contact details, identification number, etc.). The categories of Personal Data that we may process are enumerated below in this Privacy Policy
Processing (of Personal Data)	Any action conducted concerning your Personal Data such as, the collection, recording, organization, storage, modification, transfer, deletion, access, consultation, etc. of such Data
Purpose(s)	The purpose(s) of the Processing; in other words, the reasons why Personal Data is collected
Supervisory Authority	An independent public authority, which is established by a Member State of the European Union or a state for which there is an adequacy decision in order to enforce the applicable data protection laws (such as, but not limited, the CNIL in France, the Garante per la protezione dei dati personali in Italy, the Irish Data Commission in Ireland, the ICO in the UK.

2. WHAT PERSONAL DATA MAY WE PROCESS ABOUT YOU?

2.1 Categories of Personal Data

For the Purposes set out below at Section 3 of this Privacy Notice, we may process Personal Data relating to you, including the following categories and types of Personal Data:

CATEGORY OF DATA	TYPES OF DATA
Identifiable information	- First name, Middle Name, Last Name - Residence address, - Nationality, date of birth, gender (where required for travel/visa purposes) - Passport number, ID number, expiration date, issuing authority - Emergency contact details; - airline, railway or hotel loyalty program number, - Car plate number (for parking/transport reimbursements) - Data requested by local authorities to process visa requests (strictly for visa purposes) - May include additional personal life data such as family details (if required for travel/visa), personal social media address (if contact established via such channels)
Professional information	- Employer/company/organization of the Data Subject - Site of affiliation - Professional status, job title, - medical specialty (if applicable, e.g., for HCPs) - Professional contact details (e.g., e-mail, mobile number), Professional registration number (where required by law)
Personal Data strictly connected to the Event organization	- Transportation needs (flight, rail, car, local transfer) - Accommodation needs (hotel booking details, check-in/check-out dates) - Dietary requirements / preferences - Location of departure, destination, travel dates Visa and travel document support data - Participation details (sessions registered for, activities selected, attendance records)

CATEGORY OF DATA	TYPES OF DATA
Possible sensitive Data connected to the Event organization	Possible sensitive Data strictly needed to us to match your special needs connected to your participation in the Event, such as: • Information on food allergies and/or intolerances, • Information on health conditions or need of special assistance relevant to participation
Financial & Transaction Data (if applicable)	In certain cases, we may process financial and transaction data, such as: • Bank account or payment details (if reimbursement of travel/parking expenses is made directly) • Expense claims and receipts (travel, accommodation, meals, transportation, visa fees) • Per diem/indemnification records
Image & Audiovisual Data	• Photos and/or videos taken during the event (for organizational, communication, or promotional purposes, depending on consent/legal basis) • Audio recordings (if applicable, e.g., interviews, panels, or sessions)
Connection Data	Data concerning your use of the technological resources and tools provided by EssilorLuxottica and/or connected to the EssilorLuxottica network for the purposes of your registration to the Event, such as IP addresses, network identification Data (identification numbers, login, passwords), connection logs and metadata, hardware and software used, activity conducted, Data usage, etc.

2.2 Processing of Sensitive Data

Certain categories of Personal Data we may process to manage your participation to the Event may be qualified as “sensitive” (“**Sensitive Data**”): this is particularly the case of the possible sensitive Data (listed at Section 2.1. above) collected for the purposes to manage your special needs for your participation to the Event, that we may process if you decide to provide them to us.

However, please note that we only process such Sensitive Data:

- where it is required or allowed under local applicable legislation,
- while implementing adequate safeguards to ensure the protection of such Special Personal Data, and
- (if applicable) where the relevant legal basis is fulfilled.

However, please note that, when your explicit consent to process your Sensitive Data is necessary and you don't grant it to us, we will not be able to satisfy your special needs in the context of the Event (for example, if you have food allergies and/or intolerances and you do not give us your consent to process this Data, we will not be able to deliver you meals that fit your special situation).

2.3 Where are your Personal Data collected from?

We collected your Personal Data:

- directly from you during your previous interactions with the EssilorLuxottica Affiliate or other entities within the EssilorLuxottica Group; and/or
- during previous business transactions, events, or when you expressed interest in our products or services.

In the context of your registration to the Event through the completion of the registration form, please note that no third-party or tracking cookies are used, and only browsers and resolution information to access the site are collected for statistical purposes.

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We are required to use your Personal Data for Purposes defined according to the nature of our relationships.

Thus, For the purposes of this Privacy Notice, the EssilorLuxottica Entity processes your Personal Data as independent Data Controller for the following purposes and based on the following legal basis:

PURPOSES	DETAILS	LEGAL BASIS
Managing your invitation to the Event	Defining the pool of business partners to be involved in the Event	Legitimate interest
	Transferring your Personal Data to Luxottica for the management of your participation to the Event	Legitimate interest
	Sending you a personalized email with a unique link per guest to the Event registration form in order to properly secure access to the Event registration form, ensure security, control access to the platform and prevent unauthorized use	Legitimate Interest / Consent

For the purposes of this Privacy Notice, the EssilorLuxottica Entity and Luxottica process your Personal Data as Joint Controllers for the following Purposes and based on the following legal basis:

PURPOSES	DETAILS	LEGAL BASIS
Managing your invitation and participation in the Event	Sending you a personalized email with a unique link per guest to the Event registration form in order to properly secure access to the Event registration form, ensure security, control access to the platform and prevent unauthorized use	Legitimate Interest / Consent
	Arrange your participation to the Event (e.g., means of transportation, meals and accommodations, including visa, where necessary, and reimbursement of costs, where applicable)	Execution of a contract (Consent for Sensitive Data processing)
	Managing access logistics of the Event (e.g., through the generation of a unique QR code containing all your information filled in your Event Registration Form to be shown at the location of the Event for the purpose of entry control by the terminals made available only to the hosts/hostesses assigned to the Event)	Execution of a contract (Consent for Sensitive Data processing)
	Ensuring your access to the Event venue in compliance with security regulations	Legitimate interest
	Communicate with you regarding the Event (such communication may come from our local Affiliates involved in the Event organization)	Execution of a contract or Legitime interest
	Carry out data analysis activities and/or create statistics in an aggregated form (e.g., by analyzing the number of participants per site, the means of transportation chosen, etc.)	Legitimate interest
Managing the promotion and the communication of the Event	Use pictures and/or audio/video recordings to promote and/or communicate the Event on corporate websites and corporate profiles on social networks	Consent
	Use audio/video recordings of the Event for training purposes (e.g., publication on EssilorLuxottica Group online training platform “Leonardo”)	Consent
Law / Regulatory compliance constraints	Obtaining authorization and/or carrying out mandatory procedures in front of professional and/or medical bodies and organizations	Compliance with a legal obligation / Legitimate interest

	Release transparency declarations (if and where applicable)	Compliance with a legal obligation / Legitimate interest
	Implement the decisions / fulfill requests issued by Public Authorities / Public Bodies	Compliance with a legal obligation
	Manage your requests to exercise your privacy rights	Compliance with a legal obligation
	Retain Personal Data in compliance with accounting and tax obligations	Compliance with a legal obligation
Other company's interests' pursuit	Exercise our rights and/or defend ourselves in court, administrative and out-of-court proceeding, including those concerning our Group, Affiliates, representatives, shareholders, officers and directors	Legitimate interest
	Enable the technical management of the registration form and the relevant website/app and its operational functions, including solving any technical problems and performing tests, updates and upgrades that cannot be performed through the use of mere non-personal data	Legitimate interest
	Prevent or identify fraudulent activities and/or misuses of the registration form and the relevant website/app, or in general against the EssilorLuxottica Group	Legitimate interest
	Complete a potential merger, sale of assets, transfer of all or a material part of the business or financing transaction by disclosing and transferring the Personal Data to the third party (or parties) involved	Legitimate interest
	Conduct surveys concerning the Event	Legitimate interest

4. HOW DO WE PROCESS YOUR PERSONAL DATA?

The Processing of your Personal Data is carried out, electronically and manually, only within the limits necessary to pursue the Purposes outlined above.

We undertake to protect your Personal Data. To better understand how we protect your Personal Data please refer to Section 5 below.

4.1 Do we share your Personal Data with other Affiliates of the Group?

EssilorLuxottica Group is a global organization with offices and operations throughout the world and most of your Personal Data is stored and processed within a range of global applications that is used globally by the Affiliates of our Group.

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.

4.2 Is your Personal Data transferred to third parties?

Your Personal Data will be processed by our employees bound by confidentiality and privacy obligations and based on specific authorizations and instructions from us.

In particular, your Data may be accessed by the following entities/individuals where applicable and based on a need-to-act and/or need-to-know basis:

- EssilorLuxottica marketing departments;
- EssilorLuxottica external communication department;
- other participants in the Event;
- Social Media publishers;

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- service providers, generally acting as Data Processors pursuant to art. 28 of the GDPR (or any other equivalent provision of law) on behalf and based on the instructions of EssilorLuxottica, when services are needed to be performed for the purposes of the Event;
- other third parties (including Public Authorities) the Data shall be shared with for regulatory and compliance purposes.

Additional information about such third parties is available on request pursuant to Section 7 of this Privacy Notice.

4.3 Is your Personal Data transferred across the border?

Given the presence of the EssilorLuxottica Group in many countries around the world and in order to provide you with personalized services worldwide, some of your Personal Data may be transferred to, made accessible from and/or stored outside your country of residence, including in countries which do not have data protection laws equivalent to those existing within the European Economic Area (EEA). In such cases, EssilorLuxottica ensures that, at all times, appropriate safeguards are implemented to ensure that your Personal Data is processed in accordance with applicable legislation.

In this respect, where your Personal Data is processed by any of our Affiliates, the mentioned safeguards are based on the commitments taken on the basis of (i) a dedicated transfer agreement binding upon the Affiliates involved in the Processing and (ii) a set of common rules applicable throughout the EssilorLuxottica Group (the EssilorLuxottica Group Data protection policies).

Where your Personal Data is processed by Affiliates or third parties located outside the EEA (such as, but not limited to, in the United States), EssilorLuxottica ensures that specific contractual protection is implemented to ensure that this requirement is addressed in accordance with the applicable legislation, as per art. 44 and following of the GDPR.

For further information on international Personal Data transfers, you can contact us as set out at Section 7 of this Privacy Notice.

4.4 For how long do we retain your Personal Data?

We retain all or part of your Personal Data for the time strictly necessary:

- (a) to meet applicable legal and/or statutory requirements for Data retention,
- (b) to meet and comply with our legal and/or contractual obligations,
- (c) for as long as necessary to carry out each of the Purposes mentioned in this Privacy Policy, including for the Purposes of satisfying any legal, accounting, reporting requirements.

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 unauthorized 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 requirements.

In particular, your Personal Data processed for the purpose of organizing your participation at the Event shall be kept for a maximum duration of five (5) years in order to satisfy transparency ("Sunshine Act"-type) declarations or publications and legal record-keeping requirements in relation to hospitality provided to healthcare professionals, without prejudice to (i) the permanence of picture, recordings and information provided in web and social media posts relating to the Event and (ii) any longer retention periods required by current legislation for administrative purposes and/or to assert or defend a legitimate right or interest.

In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

For any additional information on the retention of your Personal Data, you can contact us at the contact details set out in Section 7 of this Privacy Notice.

5. HOW DO WE PROTECT YOUR PERSONAL DATA?

EssilorLuxottica regards the protection of your Personal Data as an essential priority.

In this respect, EssilorLuxottica has implemented appropriate measures and safeguards to protect the Personal Data it processes.

In particular, 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. These measures range from technical security measures that protect our IT systems to the physical security measures implemented at EssilorLuxottica sites, including such as the following:

- we implement and maintain 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 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, confidentiality or similar agreements, which impose an obligation on them to comply with our confidentiality and privacy requirements;
- we limit access to your Personal Data to those third parties who have a business need to know / need to act;
- we regularly provide privacy trainings to our employees who have access to Personal Data.

Additionally, 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.

6. WHICH RIGHTS DO YOU HAVE OVER YOUR PERSONAL DATA?

Pursuant applicable data protection laws (including notably the GDPR), you can exercise any of the following rights, subject to verification of your identity where necessary. Anyhow, please note that these rights shall not be intended as “absolute rights”, meaning that they are evaluated by us on a case-by-case basis and some exceptions, grounded on applicable laws, may apply. For example, we will delete your Personal Data, unless we can demonstrate compelling legitimate grounds for the Processing which override your interests, rights and freedoms.

1. Access to your Personal Data and request information about what Personal Data about you is processed, for what purposes and who such Personal Data may be disclosed to.
2. Request rectification or erasure of your Personal Data, when they are inaccurate or if the purpose for Processing is no longer lawful or appropriate.
3. To the extent (or in the limited circumstances where) 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 carried out before its withdrawal.
4. Restrict the processing of your Personal Data.
5. Object to the processing of your Personal Data for reasons relating to your particular situation.
6. Receive your Personal Data in a commonly used, machine-readable format, or obtain its direct transmission to another data controller where technically feasible (so-called “right to data portability”).

Please be aware that in the event of a post concerning the Event on our social media accounts, the respective deletion rules of the said social media will also apply to all data held by them and of which they are considered the data controllers.

To exercise your rights as a Data Subject, please see Section 7 below.

Please also note that if you are not satisfied with the way we process your Personal Data and/or respond to a request to exercise your rights, you can lodge a complaint with the relevant Supervisory Authority (for Luxottica, the Italian Supervisory Authority “Garante per la protezione dei dati personali” located in Rome, Piazza Venezia 11 – www.garanteprivacy.it).

7. HOW CAN YOU CONTACT US?

7.1 Contact of the Data Controller

The Data Controllers over the Processing of your Personal Data are set out in Section 1.1 of this Privacy Notice.

Should you have questions or comments on this Privacy Notice or on any Processing carried out by us, or should you wish to exercise your privacy rights pursuant to Section 6 above, you can contact us at the email address privacy@luxottica.com.

The Data Controllers will liaise to properly manage and fulfill the received request according to the existing agreements in force.

7.2 Contact of the Data Protection Officer

Luxottica has also appointed a Data Protection Officer, who can be contacted at the email address dpo@luxottica.com.

8. HOW CAN YOU KEEP TRACK OF CHANGES TO THIS PRIVACY NOTICE?

For legal and/or organizational reasons, this Privacy Notice may undergo changes. We suggest, therefore, checking this Privacy Notice on a regular basis on our corporate website www.essilorluxottica.com (the “**Website**”) and referring to the latest version of it (we will post the date of its last update at the top of this Privacy Notice).

In any case, an updated version of this Privacy Notice will be always available on the Website.