

EssilorLuxottica

DATA PRIVACY STATEMENT

Understanding why and how EssilorLuxottica processes your Personal Data



At EssilorLuxottica, we are committed to protecting the Personal Data we process. Upholding this commitment is essential to our success, reputation, and our ability to fulfill our Mission of helping people “**see more and be more.**”

April 2022

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What is the purpose of this Data Privacy Statement?

You might be reading this Data Privacy Statement because:

- We invited you to read this Data Privacy Statement so that you are able to obtain further information on EssilorLuxottica Group's ("**EssilorLuxottica**", "**us**", "**our**" and "**we**") data processing activities. At the time we first obtained your Personal Data, we were not able to provide you with all the necessary information;
- You are looking for publicly available information on how EssilorLuxottica processes personal data which is not directly obtained from you;
- You have been involved in a recruitment process in contact with EssilorLuxottica's HR Operations. Depending on the recipient of your request to HR Operations, your current or former employer as legal entity within EssilorLuxottica, each entity in its capacity as autonomous data controller for the processing of your personal data, wishes to provide you with information on the processing of your personal data;
- You landed on one of EssilorLuxottica's B2C websites and you would like to find out more about our data processing activities.

This Data Privacy Statement is addressed to anyone ("**data subjects**", "**you**", "**yours**") within or outside EssilorLuxottica Group. It is meant to help you understand the types of Personal Data we collect, why we collect it, and how you are able to exercise your data protection rights.

At EssilorLuxottica, we are developing expertise in lens design and eyewear manufacturing. In this context, your Personal Data is processed in a variety of ways, depending on your specific role, the way we communicate and the products/services you use. Section 4 of this data privacy statement contains further details to guide you in each individual situation.

Should you have questions or queries regarding EssilorLuxottica's processing of your Personal Data, please send an email to our Data Protection Office at compliance@essilorluxottica.com.

Why this Data Privacy Statement?

To conduct our business, we process information about you to enable you to purchase products and services, to enable you to browse our websites, to allow you to participate in our recruitment processes and for many other purposes. This may include information collected at the time of your navigation, during the process of purchasing an order and, when you possibly contact us.

These tools imply the use and collection of Personal Data from all website users, customers and business partners. We are committed to processing all Personal Data in compliance with applicable regulations, in order to protect your privacy and the security of your Personal Data.

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Better understand this Data Privacy Statement with the following definitions:

- **“Personal Data”**: any personal information, about an individual from which that person can be identified (name, contact details, identification number, etc.) The categories of Personal Data that we may process are listed in this Privacy Statement.
- **“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.
- **“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, genetical, mental, economical, cultural or social identity of that natural person.
- **“Data Controller”**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (hereinafter also “Controller”).
- **“Data Processor”**: a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the controller (hereinafter also “Processor”).
- **“Data Protection Laws” or “Regulations” or “Privacy Laws”**: any applicable law relating to data protection, privacy or similar laws applicable to the gathering, archiving, and processing of personal data, including the Regulation EU no. 2016/679 (“GDPR”).

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I. General information

This section informs you who is the Controller of the processing of your Personal Data and how you may contact the Controller.

I.1. Data Controller

For the processing activities described in this privacy notice, EssilorLuxottica is the Data Controller.

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147 rue de Paris, 94220 Charenton-le-Pont

I.2. Data Protection Officer

EssilorLuxottica has appointed a Group Data Protection Organization with a Group Data Protection Officer.

You can contact them at the following address:

GROUP DATA PROTECTION OFFICER

EssilorLuxottica

147 rue de Paris, 94220 Charenton-le-Pont

compliance@essilorluxottica.com

II. The processing activities in which we act as a Data Controller

This section explains the different data processing activities in which we process your Personal Data as a Data Controller.

II.1. Privacy notice for Corporate Websites

This section explains the different data processing activities in which EssilorLuxottica processes your Personal Data for the operation of the services provided on our corporate websites www.essilorluxottica.com; www.essilor.com; www.luxottica.com (“**Services**”) to learn more about the corresponding processing of your Personal Data in that specific context.

II.1.1 Operation of our Services

We process your Personal Data for the purpose of the operation of our services. Whenever you access our services, you automatically transfer Personal Data to our servers for technical reasons.

This processing activity may include the following data categories:

- IP address of the requesting computer;
- Date and time of access;
- Name and URL of the retrieved file;
- Transferred data volume;

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- Access status (file transferred, file not found, etc.);
- Identification data of the browser and operating system used;
- Name of the provider of the user's internet access; and
- Website from which access is made

The data processing is based on your consent or our legitimate interests. We process these Personal Data for the purpose of presenting our services and to ensure its technical stability and security (e.g., to prevent hacker attacks).

II.1.2 Contact Forms

We process your Personal Data to operate the contact form we provide in our service. This enables you to contact us, and for example, request for additional information or issue other service requests.

Your Personal Data will only be processed for the purpose of responding to your inquiry.

This processing activity may include the following data categories:

- The contact information you provided to us (such as your name, your surname, your country of residence and your email address); and
- Other personal information that you include in your request.

The processing is based on your consent.

II.1.3 Newsletters

We process your Personal Data if you have subscribed to our electronic newsletter. If you wish to receive our newsletter in relation to the Group's financial reports or investor communications, you can enter your email address in our registration form and click on the "Submit" button. You will then receive an email from us at your email address.

This processing activity includes the following categories of Personal Data: the information you provided to subscribe, such as your first and last name, your email address, your country and city of location, and the organization to which you are attached.

The processing is based on your consent, which you have provided to us during the subscription process. Your Personal Data will be deleted when you withdraw your consent.

II.1.4 Cookies

Cookies improve the user experience on our services because they allow, e.g., the system to recognize returning visitors. The term "cookies" in this privacy notice refers to cookies and similar technologies. The term "computer" in this privacy notice refers to computers, smartphones and all other devices with internet

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access. Cookies are small text files which are stored on your computer by your web browser. . These cookies allow your browser to track certain information that may be retrieved and used by internet servers at a later stage.

All types of cookies will not be retained for more than 13 months.

EssilorLuxottica uses cookies and similar technologies on its services for several reasons, for example:

- Websites load faster;
- Websites may be browsed faster;
- Your settings, such as language and time zone, may be saved;
- Security on websites is improved since your identity may be verified; and
- Your login to secured websites is facilitated.

We include the following five categories of cookies on our services:

II.1.4.1 Necessary Cookies

These cookies are necessary to safeguard the functionalities of our services and for the website to operate. Cookies are set, in particular, in response to your actions and depend on your specific service requests (e.g., setting your privacy preferences, filling out forms, or logging in).

The processing is based on our legitimate business interest to be able to provide our basic webservices in a secure and useful manner. Our website cannot function without these cookies and they can only be disabled by changing your browser preferences.

II.1.4.2 Preference Cookies

These cookies enable the provision of advanced functionalities and are used for personalization. The cookies are set in particular in response to your actions and depend on your specific service requests (e.g., setting the language).

The processing is based on the consent you provided to us in the course of the subscription process. You either grant your consent by accepting all cookies in our cookie banner or by activating the cookie type(s) you have selected. Your consent is voluntary, and you may revoke it at any time with effect for the future. You can revoke your consent by reopening our cookie banner and deactivating the cookie type. If you do not grant your consent or revoke it, this will not result in any disadvantages for you. However, without your consent, the functions explained above will not be available to you.

II.1.4.3 Statistics Cookies

Statistical cookies help website owners to understand how visitors interact with sites by collecting and transmitting information anonymously.

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The processing is based on the consent you provided to us in the course of the subscription process. You either grant your consent by accepting all cookies in our cookie banner or by activating the cookie type(s) you have selected. Your consent is voluntary, and you may revoke it at any time with effect for the future. You can revoke your consent by reopening our cookie banner and deactivating the cookie type. If you do not grant your consent or revoke it, this will not result in any disadvantages for you. However, without your consent, the functions explained above will not be available to you.

II.1.4.4 Targeting Cookies

These cookies may be set to learn more about your interests and show you relevant ads on other websites. These cookies work by uniquely identifying your browser and device. By integrating these cookies, we aim to learn more about your interests and your surfing behavior, in order to place our advertising in a targeted manner.

The processing is based on the consent you provided to us in the course of the subscription process. You either grant your consent by accepting all cookies in our cookie banner or by activating the cookie type(s) you have selected. Your consent is voluntary, and you may revoke it at any time with effect for the future. You can revoke your consent by reopening our cookie banner and deactivating the cookie type. If you do not grant your consent or revoke it, this will not result in any disadvantages for you. However, without your consent, the functions explained above will not be available to you.

II.1.4.5 Not Classified Cookies

Unclassified cookies are cookies that haven't been classified into cookie categories according to their type and purpose.

The processing is based on your consent you provided to us in the course of the subscription process. You either grant your consent by accepting all cookies in our cookie banner or by activating the cookie type(s) you have selected. Your consent is voluntary, and you may revoke it at any time with effect for the future. You can revoke your consent by reopening our cookie banner and deactivating the cookie type. If you do not grant your consent or revoke it, this will not result in any disadvantages for you. However, without your consent, the functions explained above will not be available to you.

II.1.4.6 Management and Deletion of Cookies

Some computer browsers automatically accept all cookies. In this case, you may not see the cookie banner which allows you to manage your cookies individually. However, you can change your browser settings to block all cookies. You may also be able to configure your browser settings so that only certain types of cookies are blocked or so that you are notified as soon as a new cookie is to be stored on your computer. In this case, you can accept or reject cookies individually. If this function is available to you, you will find

explanations that are more detailed in the help function of your browser. There you will also find information on how to delete all or certain cookies for which you have given us your consent.

For the list of all the cookies used and installed on our websites please refer to the dedicated Cookies Policy available on the website you are browsing. You can, at any time, update your preferences.

II.2. Processing of your Personal Data in business relationship and business context

We also process your Personal Data upon your interaction with us regarding the products and services we offer. This includes the processing of your Personal Data for marketing purposes, to communicate with you for commercial reasons, and in the course of our scientific research and development. This usually involves the processing of Personal Data, which we require to pursue these purposes, such as your contact details, preferences and payment details.

If we receive a prescription (e.g., data prescription, eye sphere, cylinder and axis for astigmatism correction, as well as for the correction of presbyopes, visit of an ophthalmologist or optometrist, pupillary distance...), this is information about your health status that may disclose diagnoses or illnesses.

Such processing of your Personal Data is usually based on your consent or on the contract. Please refer to the individual privacy notice, which we provide in the context of our business communication with you to learn more about the corresponding processing of your Personal Data in this context.

II.2.1 Business contacts and commercial prospection

If EssilorLuxottica has received your contact details from business events, for example as part of a business appointment (e.g., by exchanging business cards) or as part of an assignment, we use your contact and business details to maintain our business contacts. We process your Personal Data, if you enter and submit them via one of our contact forms or contact us otherwise (e.g., in the context of a service request).

For these purposes, we usually transfer your contact details to our CRM (Customer Relationship Management).

These processing activities may include the following categories of Personal Data:

- Your contact information (e.g., name, title, form of address, private address, gender, telephone numbers, email address, country of residence);
- Details on your profession (e.g., job title, position, personnel number, place of work, branch office, department, qualifications);
- Any further information you provide to us, e.g., in the process of your request or which is otherwise required to respond to your request.

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The processing and the use of your Personal Data is based on your consent and on the contract concluded with you, in particular to offer products and services similar to those that you had already subscribed to. The processing of your Personal Data is necessary to process your request, as well as to establish or maintain contact.

II.2.2 Purchase and use of goods and services

If and to the extent that we provide services or goods to you, or receive them from you, we may process your Personal Data (e.g., to receive your services and/or provide our goods, prepare invoicing and cash collection).

This processing activity may include the following categories of Personal Data:

- Your contact information (e.g., name, title, form of address, private address, gender, telephone numbers, email address);
- Accounting data (e.g., purchased goods and services, bank details, customer reference, tax identification number, tax category);
- Details on your profession (e.g., job title, position, personnel number, place of work, branch office, and department).
- Health data (e.g., prescription data, refraction data: health and technical data used to define your vision correction).

The processing of these Personal Data is based on the necessity for the performance of a contract with you as a client, or an individual. Without your provision of these Personal Data, we usually cannot establish and maintain contact with you, issue and receive invoices as well as receive or deliver services and/or goods in the context of the specific contract.

II.2.3 Product Safety and Product Quality

As a company that supplies health products and devices, we need to be able to identify any side effects, lack of correction effect, errors, gray market products/counterfeit devices, incorrect or off-label uses, quality complaints and/or other issues regarding the safety or quality of our products.

These processing activities may include the following categories of Personal Data:

- Your contact information (e.g., name, title, form of address, private address, gender, telephone numbers, email address, country of residence);
- Details on your purchase (customer reference, date of order, date of invoice)
- Détails on your eye prescription used to specify and manufacture the products (eye sphere, cylinder and axis for astigmatism correction, as well as for the correction of presbyopes, pupillary distance).

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The legal basis for processing the Personal Data involved in this is either our legal obligation to comply with high standards of quality and safety of health products or health devices your explicit consent, or legitimate interests that result from our need to be able to know and react to any safety or quality issues in respect of our products.

We delete personal data as soon as they are no longer required for the purposes they were initially acquired, unless the information therein is still required or there is a legal obligation to archive such personal data (e.g., information regarding adverse events).

II.2.4 Instruments

We process your Personal Data in the context of developing products related to the improvement and diagnosis of visual health, ophthalmic and scientific applications and instruments adapted to the person.

This processing activity may include the following categories of Personal Data:

- Your contact details (e.g. name, title, form of address, home address, gender, telephone numbers, email address);
- Details of your occupation (e.g. job title, function, staff number, place of work, branch, department, education).
- Health information (e.g. prescription data, refraction data, diagnosis)

The Personal Data processing is based on the need to perform a contract with you as an individual or on your consent, in particular in order to be able to process your health information. Without the data you have provided to us, we cannot conclude the process of developing the instruments. This processing may also be necessary based on a legitimate interest. We have a legitimate economic interest in processing Personal Data for the purpose of developing innovative and attractive products to increase sales, monitor technological developments and develop business models.

II.2.5 Marketing

We process your Personal Data within the scope of our public relations and marketing processes. This includes in particular, the issuance of newsletters, press kits, and registrations for press distribution lists, press contacts, press representatives, satisfaction surveys (voluntary and anonymous), loyalty programs and organization of webinars and events, making an appointment in store via our websites.

This processing activity may include the following categories of Personal Data:

- Your contact information (e.g., name, title, form of address, private address, gender, telephone numbers, email address);
- Details on your profession (e.g., job title, position, personnel number, place of work, branch office, department).

This data processing is based on your consent or can be based on our legitimate interest.

II.2.6 Accounting

EssilorLuxottica may process your Personal Data for the purpose of an orderly and lawful accounting. This is, for instance, necessary to process and record invoices, issue monetary compensation or refunds and to verify claims. In addition, EssilorLuxottica is subject to legal documentation and retention obligations based on tax and accounting laws, which also involve the processing of your Personal Data. The record keeping, documentation and archiving of such documents at EssilorLuxottica usually takes place in our IT systems, in some cases also in the form of paper files.

This processing activity may include the following categories of Personal Data:

- Your contact information (e.g., name, title, form of address, private address, gender, telephone numbers, email address, etc.);
- Accounting data (e.g., purchased goods and services, bank details, customer number, tax identification number, tax category, etc.);
- Details on your profession (e.g., job title, position, personnel number, place of work, branch office, department, etc.).

The Personal Data processing is necessary for EssilorLuxottica to manage, document, maintain and archive files and documents in order to fulfill legal obligations under tax, commercial and corporate laws. If and to the extent such laws do not apply for the processing of your Personal Data in this context, this processing activity relies on our legitimate business interest to establish and maintain an adequate accounting process, in particular to issue or settle invoices.

II.2.7 Research and Development

We may also process your Personal Data for the purpose of consumer research, scientific vision research and other R&D projects. This includes for example, studies on your visual needs and habits, ergonomics studies, satisfaction studies on vision solutions, assessment of real-life characteristics of eyeglasses and sensory analysis.

This processing activity may include the following categories of data:

- Your contact details (e.g. name, title, form of address, home address, gender, telephone numbers, email address, date of birth, etc.)
- Health information (e.g. refraction data, diagnosis, existence of an illness or disability, details of accidents, treatment history, relevant health parameters, etc.)
- Diverse data depending on the studies purpose, as lifestyle data, opinions, behaviour data or anatomical data

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- Pictures or video recordings, for behavioral observation.

In the case of biomedical research or clinical studies, the legal basis for processing the Personal Data is generally public interest in the area of public health. For consumer research and satisfaction studies, the legal basis will be your consent. In any case, we process your data only if you have explicitly consented to the processing in question, for example with regard to the processing of your special categories of Personal Data (in particular your health data).

This Personal Data is generally retained for a period of two years from the end of the study, although the retention period may depend on the data processing nature, in compliance with both local and global regulations.

II.2.8 Cyber Security

We may process your personal data for cyber security purposes. In order to protect EssilorLuxottica's data assets from unauthorized disclosure to third parties, we use a Data Loss Prevention ("DLP") tool and similar systems to prevent possible data leakage incidents by detecting and blocking certain data flows of sensitive information.

This processing activity may include the following categories of data:

- Your contact details and in particular your mail address (e.g. name, title, form of address, home address, gender, telephone numbers, email address, etc.)
- Authentication and log information

This Personal Data processing is based on our legitimate interest to protect your data as well as EssilorLuxottica group's assets against any unauthorized access, loss or theft.

In the event your Personal Data is included in a detected incident, the data is stored for as long as necessary to assess and resolve the incident or as evidence.

II.2.9 Customer Service and After Sales support

We may process Personal Data of our patients in B2B relationships and clients in B2C relationships for Customer Service and After Sales support purposes. This includes, for example, fulfilling your request via e-mail or giving assistance on the products you bought.

This processing may include the following categories of Personal Data:

- Your contact details (e.g., email address, name and surname)
- Your voice if you call our Customer Service;
- Shipping address and information related to your purchase in case of after-sale assistance.

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Your Personal Data will be processed by EssilorLuxottica's staff, duly authorized pursuant to Art. 4, no. 10, and Art. 29 GDPR and / or by the authorized personnel of third parties appropriately designated as Data Processors pursuant to Art. 28 GDPR.

II.2.10 Intellectual property

We may process Personal Data for the purpose of obtaining and using certain intellectual property rights (trademark, patent, design and copyright).

This processing may include the following categories of Personal Data:

- Your identity, contact details (e.g., email address, postal address)
- Nationality

This Personal Data processing is based on our legitimate interest to be able to register and use these intellectual property rights and can be processed and transmitted to national intellectual property offices.

III. The processing activities in which we act as a Data Processor

This section explains the different data processing activities in which we process your Personal Data as a Data Processor, bound by an agreement concluded with a Controller, being an ophthalmologist, an optometrist, an optician, that do instruct us to process.

EssilorLuxottica may access or receive some of your Personal Data from an ophthalmologist, an optometrist or an optician in the context of:

- analysis and diagnosis of your visual health, through ophthalmic or scientific instruments that are manufactured by EssilorLuxottica
- orders placed for the manufacturing and delivery of your equipment (e.g., refraction data, name and surname, etc.), the issuance of authenticity cards, and billing of your equipment to opticians.

The processing and use of your data is based on the contract (terms and conditions) with our optician customers and our legitimate interest in providing a customer service. The processing of your Personal Data is necessary to process your order.

This data is collected with your consent delivered to our customers and we process it based on their instructions in order to provide you with equipment adapted to your sight.

IV. Data deletion

Unless otherwise stated in this Data Privacy Statement, your Personal Data are regularly deleted as soon as we do not need them any more to meet our business interests, no statutory data retention obligations

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apply, or you withdrew your consent. If we make use of automated decision-making or profiling, you will be informed through a separate privacy notice.

In general, you are neither contractually nor statutorily obliged to provide your Personal Data for the above purposes. However, your decision with hold your data may lead to negative consequences, such as reduced features and functionalities, the reduced possibility of using our information and services offered in this context, the denial of access to our services and/or exclusion from our business activities to the extent the processing of your Personal Data is key in these contexts.

V. Data transfers

As a global organization 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 EssilorLuxottica 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 EssilorLuxottica Group globally, for storage and service purposes.

We may also share your information with companies, organizations, public authorities or individuals outside of EssilorLuxottica Group (such as hosting providers, IT systems providers, market and analyst service providers, payment gateways, shipping providers, credit agencies in order to run a credit check on orders, database management and maintenance services, professional advisors and external lawyers), 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.

VI. Your rights

You have the right to:

- access your Personal Data;
- request information about what data is processed about you, for what purposes and who such data may be disclosed to;
- request that EssilorLuxottica ceases processing your Personal Data provided that such request is based upon legitimate grounds as duly evaluated by EssilorLuxottica.

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- request rectification, blocking or deletion of your data when they are inaccurate or if the purpose for processing is no longer lawful or appropriate.
- 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 before its withdrawal;
- request, where applicable by local laws, your Personal Data portability, i.e. that the Personal Data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations

In order to exercise your rights, please send an email to compliance@essilorluxottica.com

Please note, however, that depending on local data privacy laws or other laws and regulations, certain Personal Data may be exempt from the above-mentioned rights.