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.**"

November
2023

What is the purpose of this Data Privacy Statement?

You might be reading this Data Privacy Statement because:

- we invited you to read it, so that you could obtain further information on EssilorLuxottica Group ("**EssilorLuxottica**", "**us**", "**our**", "**we**") and companies within the Group ("**Entities**") data processing activities, as, at the time we first obtained your personal data, we were not able to provide you with all of the necessary information relating to the processing;
- 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, or you got in contact with EssilorLuxottica's HR Department for any employment or post-employment requests;
- you landed on one of EssilorLuxottica's websites or you joined one of EssilorLuxottica events or initiatives 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. 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.

This Data Privacy Statement has the purpose of providing you with the basic information on how EssilorLuxottica and/or its Entities processes the personal data of those individuals it enters into a relationship with during the performance of its business. Therefore, the provisions hereafter shall be read and interpreted jointly with those of the relevant Privacy Notices that we provide you with while collecting your personal data and which integrate, supplement or complete this Data Privacy Statement.

At EssilorLuxottica, our expertise, which we continually strive to develop, is in respect of the professional services that we provide is in lens design and eyewear manufacturing and in the provision of contact lenses sometimes delivered by opticians/optometrists working in our Entities. In this context, your Personal Data is processed in a variety of ways, depending on the nature of the services or products that we provide to you, and the way we communicate with you, including in respect of the products/services you use. Sections II and III of this Data Privacy Statement contain 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 **privacy@essilorluxottica.com**.

Why this Data Privacy Statement?

To conduct our business, we process information about you to enable you to purchase products and services, browse our websites, participate in our recruitment processes and for many other purposes. As a customer, this may include, for example, information collected at the time of your visit to our websites, when you book or attend an eye examination appointment, during the ordering and purchasing process and when you possibly contact us. As an induvial seeking employment, this may be when you engage with us or when you ask for information after having been employed.

This implies the use and collection of Personal Data from all Websites users, apps and tools users, applicants and employees, suppliers, customers and, more in general, all business partners. We are committed to processing all Personal Data in compliance with applicable regulations, in order to protect your privacy and

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the security of your Personal Data.

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 (e.g., name, contact details, identification number, etc.). The main categories of Personal Data that we may process are listed in this Privacy Statement (hereinafter also "**Data**").
- "**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, 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 based on 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 for example, the Regulation EU no. 2016/679 ("GDPR") and the UK Data Protection Act (2018)
- "**Data Protection Officer**": the individual appointed pursuant to article 37 GDPR, who has the role to ensure that the organization processes the Personal Data of the Data Subjects in compliance with the applicable data protection rules;
- "**Data Protection Points of Contact**": individuals who are part of the IT, the HR, the Legal, or Compliance Departments or any relevant organization within EssilorLuxottica, who represent the points of contract for privacy related matters.

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EssilorLuxottica

Content

I.	General information	4
II.	The processing activities in which we act as a Data Controller	4
III.	The processing activities in which we act as a Data Processor	16
IV.	Data retention and Data deletion	16
V.	Data transfers	17
VI.	Your rights	17

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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 Data Privacy Statement, when we act in the capacity of Controller (i.e., when we determine purpose and means of the processing), the Data Controller could be, depending on the specific case, the parent company EssilorLuxottica or any of its Entities. For identifying the proper Data Controller, please refer to the relevant Privacy Notice that was provided to you at the time of the collection of your Personal Data or that is published on the relevant website and/or support (for example, QR codes).

When the Data Controller is the parent company, the Data Controller is:

EssilorLuxottica
147 rue de Paris, 94220 Charenton-le-Pont
France

I.2. Data Protection Officer

EssilorLuxottica has created a Data Protection Community composed by Data Protection Officers and Data Protection Points of Contact.

For identifying the relevant Data Protection Officer, you could refer to for any issue connected to the processing of your Personal Data, please refer to the relevant Privacy Notices.

Anyhow, you can always contact the EssilorLuxottica Data Protection Office at the following address:
EssilorLuxottica
147 rue de Paris,
94220 Charenton-le-Pont
France
Email privacy@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. 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), as well as on our B2C (Business To Customers) Websites (e.g., www.salmoiraghievigano.it, www.ray-ban.com, www.oakley.com, etc.) and on our B2B (Business To Business) Websites (e.g., https://www.barberinilenses.com, etc.) (jointly "**Websites**").

The goal is to enable you to learn more about the corresponding processing of your Personal Data in that specific context.

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II.1.1 Operation of our Websites

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

This processing activity may include the following categories of Data:

- IP address of the requesting computer;
- date and time of access;
- name and URL of the retrieved file;
- transferred data volume;
- 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;
- website from which access is made; and
- any other information that you may provide us with at the time.

We may process Personal Data for the purpose of making our Websites available to you. We may also process Personal Data for the purpose of ensuring technical stability and security of our Websites (e.g., to prevent hacker attacks).

In this context, the processing of your Personal Data is based on your consent or our legitimate interests, depending on the specific processing carried out.

II.1.2 Contact Forms

We use contact forms on our Websites to facilitate communication with you. This enables you to contact us for various purposes, such as seeking additional information or issuing other service requests.

Your Personal Data will only be processed for the purpose of responding to your enquiry. This processing activity may include the following Data categories:

- the contact information you provided us with (such as your name, your surname, your country of residence and your email address); and
- other personal information that you may include in your request, including the nature of your request.

The processing is based on your consent.

II.1.3 Newsletters

On our Websites, we may also process your Personal Data if you have subscribed to our electronic newsletter.

Namely, if you wish to receive our newsletter in relation to the Group's financial reports or investor communications, you can enter your Personal Data in our registration form present on our Corporate Websites, tick the box "I agree to receive alerts" and then click on the "Submit" button. You will then receive an email from us at your email address, asking you to confirm the subscription.

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Newsletter registration form is also present on our B2C Websites for commercial and marketing communications (e.g., promotional offers) and on our B2B Websites for news and information (e.g., presentation of new products and services, their features, etc.).

This processing activity includes the Personal Data you are required to provide us with to subscribe, such as:

- as for Corporate Websites, your first and last name, your email address, your country and city of location, the organization to which you are attached to;
- as for B2C and B2B Websites, usually only your email address.

The processing is based on your consent, which you have provided us with during the subscription process.

II.1.4 Creation of an account

On our B2C Websites, we may process your Personal Data to create an account in order to provide you with our services. This enables you, for example, to make a booking for an appointment for our professional services (as a firm of registered optometrists), place orders and easily track their progress. When applicable, we also welcome you leaving reviews.

During the account creation process, we may collect your Personal Data such as your name, your surname, your email address, your date of birth, etc. and, after its creation, you will also be enabled to see your order history, change your marketing preferences and to update your Personal Data previously given to us.

The processing of your Personal Data for purposes of viewing information on the Websites of certain of our Entities or for the creation of an account is based, depending on the specific case, on the execution of a contract or on your consent. When used for the purpose of booking an appointment for professional services delivered by our Entities or any matters relating to these professional services (for example, providing the relevant Entities with your eye prescription), the processing of this information may be carried out, depending on the specific case, based on your consent or because it is required by applicable law. Where you purchase products from our Entities, pay for services, or provide them with information for purposes of delivering your order, the processing of the information is based on the execution of the contract that the relevant Entity has concluded with you.

II.1.5 Making an order without creating an account

On our B2C Websites, we may process your Personal Data to allow you make an order of our products with us without the need to create an account.

This processing activity may include your Personal Data such as your name, your surname, your email address, your phone number, your order, your delivery address and other personal information that you may include in your order.

This processing is based on the execution of a contract between you and us.

II.1.6 Cookies

Cookies improve your experience on our Websites because they allow, for example, the system to recognize returning visitors. The term “cookies” in this Data Privacy Statement refers both to cookies and any other similar tracking technologies. The term "computer" refers to computers, laptops, smartphones

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and all other devices with an internet access.

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

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

- faster Website loading and browsing;
- saving user settings, such as language and time zone;
- improved Website security through identity verification;
- improved Website performance;
- allowing us to customize our Website to your interests;
- understanding who our audience is so that we can provide content most relevant to you.

We usually include on our Websites the following four categories of cookies.

II.1.6.1 Strictly Necessary Cookies (or Technical Cookies)

These cookies ensure the proper functioning of the Website and the use of the services existing on it. They make it possible, for example, to recognize the language of the country from which you are connecting and to save the choices made on the banner containing a short privacy notice (i.e., consent to the use of cookies), thus avoiding having to make the choice again each time the Website is accessed, to make a purchase of a product as for B2C Websites, etc. They also improve your experience, for example on B2C Websites by storing log-in data or pre-selected products in the shopping bag.

These cookies are used exclusively to ensure the basic functionality of the Website and, therefore, your prior consent is not required for their installation. You can set your browser to block these cookies, but it may impact the functionality of some or all parts of the Website.

II.1.6.2 Analytical Cookies

Some of these cookies are installed and managed directly by EssilorLuxottica and are utilized to analyze the Website usage, including counting accesses, tracking traffic sources, and monitoring pages viewed. This information helps us to make informed changes and improvements to enhance the overall Website experience. These cookies may collect Data in anonymous form for statistical purposes only.

Other analytical cookies may be instead installed by third parties in order to track the user activity on the Website, providing valuable insights.

Prior consent is required to you for their installation.

II.1.6.3 Marketing and profiling Cookies

These cookies track your navigation on the Website, allowing, for example, the creation of personalized content, showing products that may be of interest to you or similar to those that you have already viewed, as well as the sending of messages in line with the preferences expressed.

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We will obtain your prior consent to place cookies for marketing and profiling purposes. Your refusal or withdrawal of consent will not interfere with the possibility of accessing or browsing the Website.

II.1.6.4 Social Network Cookies

These cookies allow you to use the various social network functions, thanks to the use of plug-ins, integrated into some of our Websites, which allow a direct connection with the social network server. The plug-in is managed by a third party.

These cookies are not necessary for browsing and prior consent is required to you for their installation.

While the aforementioned categories outline the primary cookies utilized on our Websites, please note that individual Websites within our network may use a varying number of cookies, different types, or may name the same cookie categories differently. This flexibility ensures that each Website can tailor its cookie usage to best suit its unique functionalities and user experience.

II.1.6.5 Management and Deletion of Cookies

Strictly necessary cookies, enabling the basic functions of the Website, are installed automatically when the Website is opened, without requiring consent.
You will encounter a cookie banner on your first visit to the Website, providing a brief notice on cookies and a link to the comprehensive Cookies Policy. Consent is required for other cookie categories.
You have the flexibility to view and change their cookies preferences anytime via the privacy settings page of the Website. However, if consent has been granted and you wish to delete cookies collected before revoking consent, you can do so through your browser settings.
For a detailed list of all the cookies used on our Websites, please refer to the dedicated Cookies Policy available on the specific Website you are browsing. You can, at any time, update your preferences.

II.2. Processing of your Personal Data in customers' relationship and business relationships

We also process your Personal Data upon your interaction with us regarding the products and services we offer.

This includes, for example, the processing of your Personal Data for marketing purposes, for communicating with you for commercial reasons as well as in the course of our scientific research and product development activities. It also includes the processing of your Personal Data collected in the stores by our retail Entities.

Typically, the processed Personal Data includes information necessary for the relevant processing purposes, such as your contact details, preferences and payment details.

The processing of your Personal Data here is usually based on your consent or on the contract, depending on the specific processing activity that is carried out and of the type of processed Data. Please refer to the individual Privacy Notice, which EssilorLuxottica Entities provide, 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 through events that you participated in, following a business appointment (e.g., by exchanging business cards) or as part of an assignment, we may use your

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contact and business details to maintain our business contacts. We also 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).

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

- your contact information (e.g., name, title, form of address, private address, 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).

The processing and the use of your Personal Data may be based on your consent or on the contract concluded with you, depending on the specific cases.

II.2.2 Purchase and use of products and services

If and to the extent that we provide services or products 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, 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. Regarding Health Data, legal basis for processing is consent.
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 Processing of your Personal data for purposes of providing our services

Where an Entity is a registered firm of opticians/optometrist, your Personal Data is processed for the purposes of providing r professional services. This includes, without limitation:

- appointment bookings including the date of your consultation and the reasons for the consultation;
- details and findings of any assessment or examination conducted;
- your prescription at the time;

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- details of any treatment;
- referral or advice provided, including an optical device or solution prescribed (and post market surveillance);
- consent obtained for any examination or treatment;
- details of those involved in the optical consultation, including name and signature, or other identification of the author of the information.

Your record is created and updated on a continual basis, including after each appointment with us.

If we receive a prescription (e.g., data prescription, eye sphere, cylinder and axis for astigmatism correction, pupillary distance, etc.) issued by another firm of opticians, we will need to verify the authenticity and accuracy of the prescription.

The processing of your personal data for the provision of professional services by our Entities is based on that it is required by laws regulating our services or based on the consent depending on the cases.

II.2.4 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 (e.g., customer reference, date of order, date of invoice);
- details on your eye prescription used to specify and manufacture the products (e.g., eye sphere, cylinder and axis for astigmatism correction, as well as for the correction of presbyopes, pupillary distance).

The legal basis for processing the Personal Data involved in this could be, depending on the cases, either our legal obligation to comply with high standards of quality and safety of health products or health devices or law, or your explicit consent, or our legitimate interest that results 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 collected, unless the information therein is still required or there is a legal obligation to archive it (e.g., information regarding adverse events).

II.2.5 Instruments

We process your Personal Data in the context of producing medical devices (measurement instruments) 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:

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- 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 Data (e.g., prescription data, refraction data, diagnosis).

Processing of Health Data is carried solely based on explicit consent. The processing of the other Personal Data (not being Health Data) may be carried out based on the need to perform a contract or, in some cases, based on our legitimate interest. We may 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: in such case the relevant processing activities are carried out in compliance with the limits and rules defined by art. 89 GDPR.

Your contribution of this information is vital for the successful development of these instruments.

II.2.6 Marketing

We process your Personal Data within the scope of our public relations and marketing activities. This includes, in particular, the issuance of newsletters (ref. II.1.3 above), press kits, and registrations for press distribution lists, press contacts, press representatives, satisfaction surveys (voluntary and anonymous), loyalty programs, organization of webinars and events, organization of prize and competitions, appointment scheduling in store or via the Websites of our Entities.

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

- your contact information (e.g., name, title, form of address, private address, telephone numbers, email address);
- details on your profession (e.g., job title, position, personnel number, place of work, branch office, department);
- preferences and interests (e.g., references in receiving marketing communications, product preferences, shopping behavior, etc.);
- interaction data (e.g., Website interactions, engagement with marketing materials, responses to surveys or promotions, etc.).

Personal Data processing is generally based on your consent. Sometimes it can be based on our legitimate interest.

II.2.7 Accounting

EssilorLuxottica may process your Personal Data to ensure orderly and lawful accounting practices. This includes processing and recording invoices, issuing monetary compensation or refunds and verifying 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.

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

- your contact information (e.g., name, title, form of address, private address, 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, the processing relies on our legitimate business interest in establishing and maintaining an adequate accounting process, in particular for issuing or settling invoices.

II.2.8 Research and Development

We may also process your Personal Data for the purpose of consumer research, scientific vision research and other R&D projects mainly concerning our frames and lenses. 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 Data (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, behavior data or anatomical data;
- pictures or video recordings, for behavioral observation.

In these cases, we process your Personal 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).

II.2.9 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 Personal Data:

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

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This Personal Data processing is based on our legitimate interest to protect your data as well as EssilorLuxottica'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, in accordance with our retention policies.

II.2.10 CCTV

We may process your personal data through CCTV (video surveillance) or other surveillance systems at our premises and/or in our stores for security purposes, in order to protect EssilorLuxottica's assets and people from thefts and from other potential criminal actions.

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

- pictures of you, and
- video recordings of you and, in some instances, sound recordings.

This Personal Data processing is based on our legitimate interest to protect individuals working or visiting our premises, as well as EssilorLuxottica's assets against any unauthorized access, loss, theft or any other criminal action. We may share the Data with third parties having a lawful reason for receiving it, for example, the police.

In the event your Personal Data is involved in a detected incident, the Data is stored for as long as necessary to assess and resolve the incident or to file the necessary complaints with judicial authorities. Additional retention time may be required by the said authorities.

II.2.11 Customer Service and After Sales support

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

This processing may include the following categories of Personal Data:

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

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 service providers appropriately designated as Data Processors pursuant to Art. 28 GDPR.

Where we appoint a Data Processor, we will conclude a contract which as a minimum includes the required clauses required from a contract as stipulated by Data Protection Laws. The processing by a Data Processor is conducted on the lawful basis of fulfilling contractual obligations including the provision of the agreed services or support.

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II.2.12 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 and contact details (e.g., email address, postal address);
- your nationality

This Personal Data processing is based on our legitimate interest to be able to register and use these intellectual property rights effectively. The processed Data may be transmitted to national intellectual property offices, as necessary for these purposes.

II.3. Processing of your Personal Data in the context of pre-working and working relationships

We also process your Personal Data if you applied to a job position opened at EssilorLuxottica, as well as for the purposes connected with the management of your employment and your daily work and business activities at EssilorLuxottica.

II.3.1 Recruiting management

In the context of recruitment within EssilorLuxottica, except for exceptional cases involving entities in certain countries, EssilorLuxottica SA and its affiliates act as joint controllers, within the meaning of the GDPR, for the processing of Data for the purpose of administering recruitment within the Group. This means that they jointly define the human, technical and material resources required for processing, as well as its purposes.

In order to understand who you are and evaluate the potential of your career path, we need to process your Personal Data, such as your contact details, Personal Data concerning your private life, and information about your professional experiences and expectations, etc.

EssilorLuxottica has a legitimate interest in processing Personal Data during the recruitment process and for keeping records for a certain period of time. Processing applicants' Data allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and make informed decisions about job offers.

II.3.2 Employment management

We may process your Personal Data for the purposes connected with your employment and your daily work and business activities at EssilorLuxottica. This may include information collected at the time of your recruitment, throughout your employment and even when you eventually leave the company, in line with legitimate and compliant employer's obligations.

This processing activity includes a wide range of Personal Data, such as identification Data, Data concerning your personal life, career Data, Data regarding your employment at EssilorLuxottica, mobility Data, financial Data, Health and disability status Data, etc.

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The Personal Data processing is carried out mainly on a contractual basis or as required by applicable laws and regulations. Only in specific and limited cases (for examples for the use of pictures captured during a company's event), processing is carried out based on your consent.

III. THE PROCESSING ACTIVITIES IN WHICH WE ACT AS A DATA PROCESSOR

This section explains the different Data processing activities where EssilorLuxottica acts as a Data Processor. Where we act in the capacity as a Processor: this is as a result of us having been appointed by a Data Controller which requires the processing of Personal Data in order to meet our contractual obligations undertaken to the Data Controller.

In such a case, we are permitted to only act on the instruction of the Data Controller in the processing of your Personal Data, as stated in the contract.

Please find below the description of the main cases where we act as Data Processors.

III.1.1 Production of frames, lenses and general vision aids

We may act as Data Processors of our B2B customers (being them ophthalmologists, optometrists, opticians, etc. depending on the case) for the production of frames, lenses and general vision aids you ordered to them.

In such a case, EssilorLuxottica may access or receive some of your Personal Data 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 frames and lenses (e.g., refraction data, name and surname, etc.), issuance of authenticity cards, and billing of your equipment to opticians.

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The processing of your Personal Data is here necessary to process the order you made with your ophthalmologist / optometrist / optician, which is our customer.

III.1.2 Customers' portals and software

We may also act as a Data Processor of our B2B customers (being them ophthalmologists, optometrists, opticians, etc. depending on the case) when we provide them with portals and software solutions aimed at managing, among other things, order processing, such as the ordering phase, the order management, the order of advertising material and other information exchanges.

In such a case, EssilorLuxottica will provide its B2B customers with the associated credentials for the access to the portal or software and may also have access to the Data stored therein in order to be able to provide support in the event of functional and technical problems.

IV. DATA RETENTION AND 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, statutory data retention obligations cease to apply, the defined data retention periods outlined in the relevant Privacy Notices expired, or you withdraw your consent.

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In general, you are neither contractually nor statutorily obliged to provide your Personal Data for the purposes listed above in this Data Privacy Statement. However, please note that choosing not to share your Data may have repercussions, such as reduced features and functionalities on our Websites, reduced ability to utilize the information and services offered in this context, denial of access to our products and services and/or potential 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 (via access, visualization, storage, etc.) Personal Data collected by us both on an aggregated or individual level to various divisions, subsidiaries, joint ventures and affiliated companies of EssilorLuxottica globally whether inside or outside the European Economic Area for the purposes stated above.

We may also share your Personal Data with external entities (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, etc.), as well as with any national and/or international regulatory, enforcement, public body or court (when we are required to do so, by applicable law or regulation or at their request).

Some of these recipients of the Data above may be located overseas. Where such countries may be regarded as not providing the same level of protection as in the European Union or in the UK (as applicable) under the relevant Data Protection Laws, we will ensure that adequate safeguards, as prescribed under the applicable Data Protection Laws, are implemented (including such as the European Commission's Standard Contractual Clauses and the UK's Data Transfer Addendum or International Data Transfer Agreement, as applicable).

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 a request is based upon legitimate grounds as duly evaluated by EssilorLuxottica;
- 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 on 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 us with be returned to you or transferred to the person or entity of your choice, in a structured, commonly used and machine-readable format without hindrance from us and

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subject to confidentiality obligations;

- right to lodge a complaint with a supervisory body;
- right to receive a summary of joint controller agreements that we entered into;
- right to receive a copy of a Data Transfer Agreements upon request.

In order to exercise your rights, you can send an e-mail to the address indicated in the relevant Privacy Notice applicable to you. Furthermore, you can always send an email to privacy@essilorluxottica.com.

However, please note that that, depending on local Data Protection Laws or other laws and regulations, certain Personal Data may be exempt from the above-mentioned rights.

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