

PRIVACY POLICY

pursuant to Article 13 of the Regulation EU 2016/679 (“**GDPR**”)
(hereinafter also referred to as the “**Policy**”)

1. Data Controller

Luxottica Group S.p.A., a company registered under the laws of the Republic of Italy, with registered office at Piazzale Cadorna 3, 20123, Milan, Italy, Company registration number 10182640150, is the party that determines the purpose and the means of the processing, so being the data controller (under the meaning of Article 4, paragraph 1, n.7 of the GDPR) over your Personal Data (hereinafter “**Luxottica**”).

In some specific cases, for managing your support request, Luxottica could be a joint controller over the Personal Data you submitted through the customer support form with the relevant Affiliate in charge of such an activity in the country and for the brand your request refers to (hereinafter, the “**EssilorLuxottica Entity**”). This means that Luxottica and the EssilorLuxottica Entity are jointly responsible with such an entity for deciding on the purposes and means of the processing.

For the purposes of this Policy, “Affiliate” means 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.

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

2. Processed Personal Data

The following Personal Data about you is processed for the purposes set out below under Section 3 of this Policy:

- identifiable information, including such as name and surname;
- contact information, including such as e-mail address, postal address, phone;
- purchase information, including such as year of purchase, name of retailer, location of retailer, product model code;
- details on the problems which lead you to submit the support request, including such as images of the product, details on the defect(s)/problem, additional notes;

(hereinafter individually or collectively referred to as “**Personal Data**”).

3. Processing Purposes and applicable legal basis

We process your Personal Data to pursue the following purposes:

- (i) to manage your support request. The legal basis for the processing of your Personal Data is here represented by the execution of a contract pursuant to Article 6, paragraph 1, letter b) of the GDPR;
- (ii) to manage possible claims, defaults, complaints, litigation and/or settlements, arising from (or as a consequence of) the contractual purposes above. The legal basis for the processing of your Personal Data is here represented by the pursuit of a legitimate interest of the data controller and/or third parties (e.g., in the event of disputes), pursuant to Article 6, paragraph 1, letter f) of the GDPR;
- (iii) purposes related to the fulfillment of legal obligations (e.g., reimbursements) and compliance to national and EU laws and regulations, and/or provisions issued by public and/or legal authorities. The legal basis for the processing of your Personal Data for this specific purpose is the fulfillment of obligations under the law and applicable regulations pursuant to Article 6, paragraph 1, letter c) of the GDPR;

(hereinafter individually or collectively referred to as the “**Purposes**”).

4. Nature of Personal Data provision and consequences of failure to provide Personal Data

The provision of your Personal Data for the Purposes above is mandatory to fulfil support request request, and failure to provide such Personal Data will make it impossible for us to fulfil your request.

5. Communication of your Personal Data to third parties

The collected Personal Data is processed by EssilorLuxottica's employees based on specific authorizations and instructions, and bound by legal and/or contractual confidentiality obligations.

If necessary, EssilorLuxottica may also ask third-party providers to carry out certain data processing activities on your Personal Data on its behalf and in accordance with its instructions, such as persons, companies, associations providing assistance, advice and/or services to EssilorLuxottica, with particular but not exclusive reference to administrative, accounting, legal, tax and financial matters, including also companies of the corporate group which EssilorLuxottica belongs to (the "**EssilorLuxottica Group**").

The provided Personal Data may also be communicated to third parties in the following context:

1. in the event of a merger, acquisition or transfer of the company or company branch;
2. in order to fulfil the obligations provided for by law, regulations, protocols, national or applicable international legislation;
3. in order to implement rules required by and/or decisions issued Public Authorities, Bodies and/or Institutions;
4. in order to enable EssilorLuxottica's defense in court.

The third parties above will process your Personal Data as data processors on the basis of appropriate contractual commitments and/or letters of appointment drawn up in accordance with Article 28 of the GDPR, or as independent data controllers, as applicable. EssilorLuxottica requires that any such third-party provider is also obliged to implement measures and controls and provide appropriate guarantees so as to ensure that security and confidentiality of your Personal Data.

Given the transnational nature of the EssilorLuxottica Group, your Personal Data may be transferred to countries outside the European Economic Area. Where such a transfer occurs, EssilorLuxottica guarantees, in any case, compliance with applicable legislation and the adoption of appropriate measures to ensure the necessary levels of security, including (where necessary) Standard Contractual Clauses, subject to further analysis of the security of the transfer. You can always request specific information on the location of your Personal Data by writing to "privacy@luxottica.com."

6. Personal Data storage and retention

EssilorLuxottica retains all or part of your Personal Data for the time strictly necessary in order to:

- meet applicable statutory requirements for Personal Data retention,
- meet and comply with legal and/or contractual obligations,
- as long as necessary to carry out each of the purposes mentioned in this Policy, including for the purposes of satisfying any legal, accounting, reporting requirements.

To determine the appropriate retention period for your Personal Data, EssilorLuxottica considers jointly the amount, nature, and sensitivity of the provided Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which it processes your Personal Data, whether it can achieve those purposes through other means, and the applicable legal requirements.

In particular, your Personal Data will be retained for a period of 10 (ten) years after it is necessary to process it for the Purposes, including for the processing for accounting and legal reasons, save for the circumstances in which applicable laws may provide for different retention requirements.

7. Processing means and Personal Data security

EssilorLuxottica considers the protection of your Personal Data an essential priority.

Your Personal Data is processed using both manual and computerized methods and tools and it is protected through the adoption of appropriate security measures, necessary to minimize the risks of destruction or loss, even accidental, of the Personal Data, of unauthorized access or processing that is not permitted or does not comply with the purposes of collection as indicated in this Policy.

The security measures in place include, but are not limited to, technical measures aimed at ensuring that Personal Data is recorded and processed in the strictest confidentiality and security and restrictions on access to Personal Data

8. Your Rights

Pursuant to Chapter III of the GDPR, you have certain rights, including the right to:

- request confirmation that Personal Data about you is being processed and, if so, request access to information relating to such a processing;

- ask for the correction of inaccurate or incomplete Personal Data;
- ask EssilorLuxottica to erase your Personal Data;
- request the restriction of the processing of your Personal Data or oppose such a processing;
- ask EssilorLuxottica to be provided with your Personal Data in a commonly used and machine-readable format or to have it transmitted directly to another data controller, where technically feasible (so-called “right to data portability”).

To this extent you may contact EssilorLuxottica by writing to “privacy@luxottica.com”.

If, after having contacted EssilorLuxottica, you are not satisfied with the response received, you may lodge a complaint with the competent Supervisory Authority (pursuant to Article 77 of the GDPR) or file a complaint with the competent Courts (pursuant to Article 79 of the GDPR).

9. Data Protection Officer

Luxottica appointed a Data Protection Officer (DPO) who can be contacted by writing to “dpo@luxottica.com”.