

PRIVACY POLICY

1. PROTECTING YOUR PRIVACY

Luxottica and its related bodies corporate knows that you care how information about you is used and recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. This Privacy Policy explains how we collect and manage your personal information. In this Privacy Policy, "Luxottica", "we", "our", "us" refers to Luxottica Retail Australia Pty Limited (ACN 000 025 758) and Luxottica Retail New Zealand Limited (NZCN 636829), their related bodies corporate, and the ultimate holding company EssilorLuxottica, including related entities and stores that trade under the brand "OPSM", "Ray-Ban", "Sunglass Hut", "Laubman & Pank" and "Oakley".

2. WHAT IS YOUR PERSONAL INFORMATION?

The term 'personal information' has the meaning given to it in the applicable privacy laws, for Australia Privacy Act 1988 (Cth) and for New Zealand Privacy Act 2020. In general terms, personal information is any information that can be used to personally identify you. This may include your name, address, telephone number, email address, profession or occupation. If any of the information we collect from you identifies you, or is reasonably capable of identifying you, then it will be considered personal information.

3. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect the following types of personal information:

- full name;
- mailing or street address;
- email address;
- telephone number;
- your gender and date of birth;
- your lifestyle, occupation and hobbies;
- health fund details;
- your employer;
- details of the products and services you have ordered or purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- your payment details, such as your credit card information;
- details of your style and preferences, such as your choices of glasses, lens, frame or other factors relevant to eyewear choice;
- any information that you provide to us directly through any of our websites, mobile apps or indirectly through the use of our websites, mobile apps or online presence, through our representatives or otherwise;
- information you provide to us through our Customer Care team or our Customer Experience Surveys;
- biometric technologies (for example facial scanning); and
- medical information and medical history about you, such as the parameters of your prescription glasses and information about the health of your eyes.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect aggregated information about how users use our website.

We are required to collect your name, address and date of birth as part of our legal and regulatory obligations, including under the Health Practitioner Regulation National Law as enacted in each state and territory of Australia and for New Zealand, the Health Practitioners Competence Assurance Act 2003

4. HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in different ways including:

- when you visit any of our stores for an eye test;

- when you attend a vision screening organised by us at a public or industry event or a vision screening organised by your employer;
- when you visit any of our stores to purchase eyewear products (such as sunglasses, frames, lenses and contact lenses) and associated products and services;
- when you book an eye test using our website, our apps, over the phone or when you visit our store or attend our screening clinic;
- when you contact us via our social media pages (such as Facebook, Twitter or Instagram);
- your lifestyle, occupation and hobbies;
- when you enter a competition;
- when you order or complete a purchase order with us, including online purchases;
- when you visit our mobile van clinic for an eye test;
- when you contact us with an enquiry or complaint in relation to our products and services;
- through your registration, access and use of our website or mobile apps; and
- when you apply for a job with us.

We may also collect personal information from third parties including:

- from third party companies such as credit reporting agencies, law enforcement agencies and other government entities (such as the Department of Veterans Affairs);
- from data analysis agencies and other commercial partners;
- from employment recruitment agencies;
- from health funds;
- from our franchisees who operates optometry practices under any of our brand;
- from third party optometry practices which have been converted to our stores;
- from our related bodies corporate; and
- from other optometrists and health practitioners with your consent

When you use our website or our mobile apps, we may use aggregated, anonymous analytic tracking via a third party to gather information about the way the website or app is used. In some cases we may also collect your personal information through the use of cookies. When you access our website by typing the address in your browser or by clicking on our advertisement on a third party website, we or a third party on our behalf may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register or to log in. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movements, and gather broad demographic information.

We also work with other companies who use tracking technologies, including web beacons, to serve ads on our behalf across the internet. These companies may collect non-personally identifiable information about your visit to our website about your interaction with our mobile app or communications, including advertising and e-mails. If you object to web beacons, we recommend that you follow the instructions for deleting existing cookies and disabling future cookies.

5. WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION?

Whether or not you provide personal information to us is entirely up to you. If you do not provide us with the personal information described above, then depending on the context, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to process your order and purchase;
- we may not be able to process health fund discounts or rebates;
- we may not be able to process any third party discounts or benefits;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions;
- some functions our website or mobile apps may be restricted or not operational; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

6. FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION

We collect personal information about you so that we can understand your needs better, provide you with the most appropriate eye care and eye wear products and services, improve our products and services, and to provide you with a high quality of customer service.

We also collect, hold, use and disclose your personal information for the following primary purposes:

- to provide products and services to you and to facilitate the use of any of our websites or apps, including personal shopping and “virtual try on” experiences;
- to provide products and services to you as a result of a contractual arrangement with your employer;
- to answer enquiries and provide information or advice about existing and new products or services;
- to advise you on your eye care needs including when it's time to come and see us for another eye test;
- advise you if we or one of our optometrists relocate;
- advise you if your store has merged/rebranded, relocated or closed;
- to assess the performance of the website and mobile apps and to improve the operation of the website and mobile apps;
- to assess our customer service and to improve our customer service to you;
- to administer any contest, promotion and survey that we may run from time to time (for instance to deliver a prize you may have won in a contest);
- to conduct business processing functions including providing personal information to our related bodies corporate, franchisees, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing and marketing research), other communications, planning, product or service development, support, quality control, human resources, educational, data analytics and research purposes of Luxottica, its related bodies corporate, franchisees, contractors or service providers;
- to provide relevant data and information to our franchisees or a purchaser when they acquire any of our stores;
- to provide your updated personal information to our related bodies corporate, franchisees, contractors or service providers;
- to update our records and keep your contact details up to date
- to process and respond to any complaint or enquiry made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

We may also collect personal information about third parties from you, such as personal information about your family members, so that we can provide products and services to those third parties. If you provide personal information about a third party individual to us, you must ensure that the third party individual is aware of this Privacy Policy, understands it and agrees to accept it. If you provide personal information about a third party individual and that individual does not have the capacity to understand and agree to these terms (for example, a minor), we require a parent or guardian to acknowledge and agree to this paragraph.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

7. TO WHOM MAY WE DISCLOSE YOUR INFORMATION?

We may disclose your personal information to:

- our employees, related bodies corporate, franchisees, contractors or service providers for the purposes of operating our website, mobile apps or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, lens suppliers and manufacturers, contact lens vendors, web and cloud hosting providers, cyber security service providers, order fulfilment and shipping providers, customer service desk, IT systems administrators, mailing houses, couriers, payment processors, support providers, data entry service providers, data analysts, electronic network administrators, debt collectors, archivists and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- referees whose details are provided to us by job applicants;
- to government and regulatory bodies and law enforcement agencies, ;
- with your consent, to other health practitioners and medical practitioners and forward relevant information to that health practitioner or medical practitioner about your particular condition; and
- any other organisation for any authorised purpose with your express consent, including your insurers and your solicitors.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

We also may also share non-personal information, such as the number of users who visited our website during a specific time period or who purchased a specific product through the website, with our marketing partners, advertisers and others from time to time. This information generally is shared in an aggregated form. As with any business, it is possible that as our business develops, we might go through a business transition, such as a merger, acquisition by another company, sale of all or a portion of our assets or buying online stores or other assets. In such transactions, information about customers will likely be transferred. You will be notified via a prominent notice on our site for 30 days of any such change in ownership or control of your personal information. To the extent permitted by law, you will be deemed to have consented to the transfer of your personal information to any such successor entity unless you notify us via email to the contrary within the 30-day period. Please note that, if you withhold your consent to the transfer, the purchaser or new business may not have your contact details or prescription records, and thus may not be able to provide you with eye check reminders and the like.

We are not responsible for the privacy policies of any third party. Third parties are responsible for informing you about their own privacy practices.

8. DIRECT MARKETING

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (AU) and the Unsolicited Electronic Messages Act 2007 (NZ). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications, and we will then ensure that your name is removed from our mailing list.

We may also disclose your personal information to our related bodies corporate, our other business partners and our service providers to give you information and offers about products and services offered by us or these companies. We may also provide your personal information to our service providers for the purposes of contacting you when it's time to come and see us for another eye test.

Please note that by opting out of receiving marketing communications, you may still receive communications from us (such as invoices and notices) in relation to the products and services you have purchased from us.

9. HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

We require accurate personal information about you to ensure you receive the best possible service from us. You may request access to any personal information we hold about you at any time by contacting us (see the details below). Please ensure you are able to advise which store you last visited for eye care services and eyewear products. Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge you for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal. We take reasonable steps to ensure that your personal information is up-to-date whenever we collect it or use it. This may include, for example, using data obtained from third parties to verify the accuracy of your personal information.

If you find that current personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will take reasonable steps to correct it.

10. WE STORE YOUR PERSONAL INFORMATION SECURELY

We take reasonable steps to ensure we protect any personal information that we hold from misuse, loss and unauthorised access, modification and disclosure.

Your personal information may be stored in hard copy documents and electronically.

We maintain physical and electronic security over our paper and electronic data storage. We also maintain computer and network security. For example, we use firewalls (security measures for the Internet) and other systems such as user identifiers and passwords to control access to computer systems.

If the personal information we collect is no longer needed for any purposes and we are not required by law to retain it, we take reasonable steps to destroy or permanently de-identify it.

In the unlikely event that your personal information is at risk of serious harm caused by a data breach, we will promptly investigate the breach and as soon as practicable after becoming aware that a notifiable privacy breach has occurred notify you, and, for Australia, the Australian Privacy Commissioner or for New Zealand, the Office of the Privacy Commissioner.

11. DISCLOSURE TO OVERSEAS RECIPIENTS

We may disclose your personal information to the persons listed above, including our related bodies corporate and third party suppliers and service providers, government and quasi-government organisations, prospective purchasers of part of or the whole of our business and stock exchanges located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. Disclosure to our related bodies corporate overseas will be governed by an intra-group data transfer agreement.

We may disclose your personal information to entities located outside of Australia and New Zealand, including to entities located in the United States of America, Canada, the United Kingdom, Ireland, Italy, France, Switzerland, Norway, Turkey, Thailand, India, China, and EU member states.

12. COMPLAINTS

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will investigate your complaint and will advise you of the outcome of our investigations in writing.

If you are not satisfied with our response or wish to make a direct complaint to the regulator, you may contact the applicable Privacy Commissioner in Australia or New Zealand.

In Australia

Office of the Australian Information Commissioner

www.oaic.gov.au

In New Zealand

Office of the Privacy Commissioner

www.privacy.org.nz

13. LINKS

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

14. CONTACT US

If you have any questions about this Privacy Policy, any concerns or a complaint relating to your personal information, please use the Contact Us link on our website or contact us using the details set out below.

Please contact us at:

Customer Care Australia

Luxottica Retail Australia Pty Ltd

Post: Attn: Privacy Officer, Level 34-36, 1 Denison Street North Sydney NSW 2060

Telephone: 1800 626 300

Email: supportaustralia@shop.ray-ban.com

15. UPDATES

We reserve the right to make changes to this Privacy Policy, and other related policies posted from time to time. Please review our website periodically to see any updates to the information provided here. This Privacy Policy was last updated on 25 May 2022.