

## Unofficial Privacy Notice

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### Content

Unofficial is part of the EssilorLuxottica Group.  
At EssilorLuxottica, we are committed to protect **our Data Subjects' Personal Data**, including our customers, prospects and users.  
Upholding this commitment is essential to our success and reputation, and ultimately our ability to fulfil our mission of helping people **see more, be more and live life to its fullest.**

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## 1. INTRODUCTION

### 1.1 Who are we?

GrandVision Retail Holding B.V., with registered office at Postbus 75806, 1118ZZ Schiphol, Company registration number 34237823, a company which is part of the EssilorLuxottica Group and owner of the website unofficial-eyewear.com (“the **Website**”), is the party that determines the Purposes and the means of the Processing, so being the Data Controller over your Personal Data.

Further in this Privacy Notice, when it is made reference to **“Unofficial”** or **“we”** or **“us”** or **“our”**, we refer to GrandVision Retail Holding B.V.

### 1.2 What does this Privacy Notice apply to?

EssilorLuxottica and all its Affiliates (as defined below) attach particular importance to the Processing, confidentiality and security of your Personal Data.

The purpose of this Privacy Notice is to inform you in a clear, simple and complete manner about the Processing carried out on the Personal Data that you provide us with, or that we can collect from the points of contact that you may have with us (e.g., this Website, social media, etc.), their possible transfer to third parties as well as your privacy rights and the options that you have to control your Personal Data and to protect your privacy, in accordance with the applicable legislation.

We may update this Privacy Notice at any time, but if we do so we will provide you with an updated copy of this Privacy Notice as soon as reasonably possible as per Section 9 below.

Please also note that this Privacy Notice does not apply when you share your Personal Data on social media or other online platforms owned and managed by third parties, even when their links are included on our Website. These other companies have their own privacy notices in place, so remember that the way they use any Personal Data you give them will be subject to their own rules. Unofficial always encourages you to review the privacy notices of these third parties before connecting and/or providing them with your Personal Data.

### 1.3 What is this Privacy Notice about? Key definitions

<b>Affiliate(s)</b>	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
<b>Data Controller</b>	The natural or legal person, department or organisation which, alone or jointly with others, determines the Purposes and means of the Processing of Personal Data
<b>Data Processor</b>	The natural or legal person, department or other body which processes Personal Data on behalf and based on the instructions of the Data Controller
<b>EssilorLuxottica Group</b> (or, simply, <b>EssilorLuxottica</b> or <b>Group</b> )	EssilorLuxottica as global organization, i.e., jointly EssilorLuxottica (as ultimate holding company) and all its Affiliates
<b>GDPR</b>	The Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (the so called “General Data Protection Regulation”)
<b>Personal Data</b> (or simply <b>Data</b> )	Any information about an individual ( <b>Data Subject(s)</b> ) from which that person can be identified (e.g., name, contact details, identification number, etc.). The categories of Personal Data that we may process are enumerated below in this Privacy Notice
<b>Personal Data Breach</b>	A breach of security resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, Personal Data transmitted, stored or otherwise processed

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<b>Processing</b> (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
<b>Product(s)</b>	Frames, lenses, contact lenses and any other goods provided for sales in our stores or on our websites
<b>Purpose(s)</b>	The purpose(s) of the Processing; in other words, the reasons why Personal Data is collected
<b>Supervisory Authority</b>	An independent public authority, which is established by a Member State of the European Union or a state for which there is an adequacy decision in order to enforce the applicable data protection laws (such as, but not limited, the CNIL in France, the Irish Data Commission in Ireland, the ICO in the UK, the Garante per la protezione dei dati personali in Italy).

Likewise, this Privacy Notice will apply to the following Data Subjects:

<b>Web Users</b>	Data Subjects who access the Website
<b>Social Media Users</b>	Data Subjects who voluntarily follow Unofficial activity on social media.

## 2. WHERE ARE PERSONAL DATA COLLECTED FROM?

The Personal Data we collect depends on the point of contact through which you interact with us, as well as the purposes of such an interaction, and are also limited to those which are relevant and appropriate for it.

We may collect Personal Data about you:

### a) By using automatic tracking systems

On our Website, we use some technologies (e.g., cookies and automatic tracking systems) that automatically collect certain items of information relating to the way in which you utilize the Website. For further information on the use of Personal Data collected through cookies and automatic tracking systems, please read carefully our Cookie Notice available [here](#).

### b) From other sources

We may obtain information about you from other sources, such as publicly available sources, data analytics providers, marketing or advertising service providers, fraud prevention service providers, vendors that provide services on behalf of us, or publicly available sources. We may also create also information based on our analysis of the information we have collected from you.

## 3. WHAT PERSONAL DATA MAY WE PROCESS ABOUT YOU?

### 3.1 Categories of Personal Data

CATEGORY OF DATA	TYPES OF DATA
<b>Device information</b>	Including such as the IP address or other unique code of your device (computer, mobile or other devices), technical information that may include the URL from where you originate, time zone setting and location, browser information and language
<b>Navigation information</b>	Including such as information regarding your interactions with our Website, or advertisements and statistical Data relating to these interactions

## 4. WHY DO WE PROCESS YOUR PERSONAL DATA?

We are required to use your Data for Purposes defined according to the nature of our relationships. Thus, depending on the context in which your Data is collected, it may be used for one or more of the following Purposes:

PURPOSES	DETAILS	LEGAL BASIS
<b>Law compliance</b>	<ul style="list-style-type: none"> <li>Comply with the requirements of laws, regulations, protocols and national and EU legislation in force</li> <li>Implement the decisions issued by Public Authorities</li> <li>Manage your requests to exercise your privacy rights</li> <li>Retain Personal Data in compliance with legal obligations</li> <li>Combating frauds</li> </ul>	<b>Compliance with a legal obligation</b>
<b>Legitimate interest' pursuit</b>	<ul style="list-style-type: none"> <li>Exercise our rights and/or defend ourselves in court, administrative and out-of-court proceedings, including those concerning our Group, Affiliates, representatives, shareholders, officers and directors</li> <li>Enable the technical management of the Website and its operational functions, including solving any technical problems and performing tests, updates and upgrades that cannot be performed through the use of mere non-personal data</li> <li>Prevent or identify fraudulent activities and/or misuses of the Website, or in general against the EssilorLuxottica Group and/or the users of the Website</li> <li>Complete a potential merger, sale of assets, transfer of all or a material part of the business or financing transaction by disclosing and transferring the Personal Data to the third party (or parties) involved</li> <li>Anonymize Personal Data for analysis purposes</li> </ul>	<b>Legitimate interest</b>

## 5. HOW DO WE PROCESS YOUR PERSONAL DATA?

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

We undertake to protect your Personal Data. To better understand how we protect your Personal Data please refer to Section 6 below.

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

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

The majority of the Processing of your Personal Data is carried out through the concentrated services of two entities: Essilor International and Luxottica Group S.p.A.

### 5.2 Is your Personal Data transferred to third parties?

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

Your Personal Data may, also, be communicated to the external parties enumerated below, which will process your Personal Data as Data Processors or independent Data Controllers depending on the circumstances. More information about such third parties is available on request pursuant to Section 8 of this Privacy Notice.

#### a) Service providers

We may disclose your Personal Data with our third-party service providers that provide us with their services, assistance and advice, with special – but not exclusive – reference to technology, administrative, legal, insurance, IT and data analysis matters.

Each service provider may act, depending on the case and on the specific nature of our relationship, as:

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- Data Processors, on behalf of and in accordance with the instructions received from us, by virtue of a specific agreement in place per Article 28 of the GDPR, which sets out specific obligations and guarantees of implementation of appropriate technical and organizational measures;
- independent Data Controllers.

Please note that we require that any such third-party providers are subject to strict control and implement appropriate guarantees of security and confidentiality of your Personal Data.

## **b) Sale or merger**

We may also disclose your Personal Data in the event that we sell, buy, merge with, are acquired by, or partner with other companies or businesses, or sell some or all of our assets, or in the unlikely case we are part of a bankruptcy.

In such cases, we may disclose your Personal Data to the prospective purchaser of such business or assets or business counterparts in general, and your Personal Data may be among the transferred assets as well.

## **c) Click on social network icons present on the Website**

If you click on the icons dedicated to social networks (e.g., Instagram), you are redirected to these external websites.

[Brand/Banner] does not either collect or process Personal Data about you or the sharing that you make via social network. When you are redirected to the social network, your interactions and information are collected by the social network itself and are subject to that social network's own privacy notice.

## **d) Legal process**

We may disclose your Personal Data to any authority, court, administrative body, and/or other authorized third party (including, without limitation, external legal counsel), where the disclosure of such Personal Data is required by law, regulation or court order, or where such a disclosure is necessary for the protection and defense of our rights.

## **5.3 Is your Personal Data transferred across the border?**

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

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

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

For further information on international Personal Data transfers, you can contact us as set out at Section 8 of this Privacy Notice.

## **5.4 For how long do we retain your Personal Data?**

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

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

To determine the appropriate retention period for Personal Data, we consider jointly the amount, nature, and sensitivity of the processed Personal Data, the potential risk of harm arising from the unauthorized use or disclosure

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of your Personal Data, the Purposes for which we process your Personal Data and whether we can achieve those Purposes through other means, and the applicable legal requirements.

For any additional information on the retention of your Personal Data, you can contact us at the contact details set out in Section 8 of this Privacy Notice.

## 6. HOW DO WE PROTECT YOUR PERSONAL DATA?

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We regard the protection of Personal Data as an essential priority.

We are aware that we have the responsibility for the security and accuracy of the Personal Data that we process and also for keeping your Data up to date. To this extent, we have taken reasonable steps to eliminate duplicates of your Personal Data and to facilitate your updating of that Data which may change over time.

We have also implemented appropriate technical, organizational and security measures and safeguards to protect the Personal Data we process. This is reflected in the EssilorLuxottica Group Data Protection Policy, and related guidelines, policies and procedures, as well as in the Information Security policies, procedures and measures implemented throughout the Group.

Namely, we put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. The security measures in place range from technical security measures that protect IT systems, to the physical security measures employed at EssilorLuxottica Group's sites and offices.

We have also implemented a policy to deal with any suspected Personal Data Breach, and we undertake to notify you and any applicable regulator of such a breach where we are legally required to do so.

Furthermore, we limit the access to your Personal Data to those of our employees, agents, contractors and third parties which have a business need to know it. They will process your Personal Data only based on our instructions and they are subject to a strict confidentiality duty.

We also require our staff to participate in data protection and information security training.

More details on the security measures implemented within the EssilorLuxottica Group may be required by contacting us at the contact details set out in Section 8 of this Privacy Notice.

## 7. YOUR RIGHTS

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Pursuant to Chapter 3 of the GDPR, you can exercise any of the following rights, subject to verification of your identity where necessary. Anyhow, please note that these rights shall not be intended as "absolute rights", meaning that they are evaluated by us on a case-by-case basis and some exceptions, grounded on applicable laws, may apply. For example, we will delete your Personal Data, unless we can demonstrate compelling legitimate grounds for the Processing which override your interests, rights and freedoms.

### **a) Right of Information and Access**

You may ask us for confirmation of the existence of your Personal Data, to be informed on its content and source and obtain a copy of that Personal Data which our databases currently contain.

### **b) Right to Rectification**

If you notice that the Personal Data we have about you is incorrect, or we are missing important information, you may request us to rectify your Personal Data that our databases currently contain. We may not accommodate a request to rectify your Personal Data if we believe the change would violate any law or legal requirement or cause the information to be incorrect. Where applicable, we will also ensure such changes are shared our trusted third parties engaged to perform Processing activities on your Personal Data for the Purposes set forth in this Privacy Notice.

### **c) Right to Restriction of the Processing**

In some cases, you have the right to demand that our Processing of your Personal Data should be restricted. When such restrictions are not possible, we will inform you accordingly. You can then choose to exercise any of the other

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rights enumerated under this Privacy Notice, including withdrawing your consent to the Processing of your Personal Data when consent represents the legal basis for Processing.

## **d) Right to Object to the Processing**

You have the right to object to the Processing of any Personal Data that we process about you based on our legitimate interests. In your request, please specify in writing the Processing that you are objecting to. When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Privacy Notice, including the withdrawing of your consent to the Processing of your Personal Data when consent represents the legal basis for Processing. Where applicable, we will ensure that such changes are shared with our trusted third parties engaged to perform Processing activities on your Personal Data for the Purposes set forth in this Privacy Notice.

## **e) Right to Erasure**

You have the right to request that we erase your Personal Data in certain situations. Upon receipt of such a request, we will acknowledge its receipt and, thereafter, we will also acknowledge the successful deletion of your Data, unless we can demonstrate compelling legitimate reasons that require us to continue their Processing and that override your legitimate rights and interests. Where applicable, we will also ensure that such changes are shared with our third parties engaged to perform Processing activities on your Personal Data for the Purposes set forth in this Privacy Notice.

## **f) Right to Data Portability**

Upon request, when possible and where applicable under local laws, we can provide you with copy of your Personal Data in a structured, commonly used and machine-readable format and/or you can have it transmitted to you or to another Data Controller. When such a request cannot be honored, we will advise you accordingly.

## **g) Right to Withdraw your Consent**

Where Processing is based on consent, you may withdraw your consent at any time to the Processing of your Personal Data. Upon receipt of such a withdrawal of consent, we will confirm its receipt and proceed to stop Processing your Personal Data.

In order to exercise your rights, you may contact us at [ebm-privacy@grandvision.fr](mailto:ebm-privacy@grandvision.fr)

## **h) Right to lodge a complaint with the relevant Supervisory Authority**

If you are not satisfied with the way we process your Personal Data and/or respond to a request to exercise your rights, you can lodge a complaint with the relevant Supervisory Authority.

## **8. HOW CAN YOU CONTACT US?**

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The Data Controller over the Processing of your Personal Data is GrandVision Retail Holding B.V., which contact details are set out in Section 1.1 of this Privacy Notice.

Should you have questions or comments on this Privacy Notice or on any Processing carried out by us, we may be contacted at the postal address set out in Section 1.1 above and/or at the email address specified in the preceding Section 7.

## **9. HOW CAN YOU KEEP TRACK OF CHANGES TO THIS PRIVACY NOTICE?**

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For legal and/or organizational reasons, this Privacy Notice may undergo changes. We suggest, therefore, checking this Privacy Notice on a regular basis and referring to the latest version of it (we will post the date it was last updated at the top of this Privacy Notice).

An updated version of this Privacy Notice will be always available on the Website, and we will provide additional notice to you if we make any changes that materially affect your privacy rights.