

Privacy Notice

SUNGLASS HUT

1. Object

This policy illustrates how Sunglass Hut as part of Luxottica Retail UK Ltd, (hereinafter "Luxottica") in its capacity as Data Controller, processes personal data information of the data subjects, customers of its retail stores (hereinafter, "user", "users" or "you") according to art. 13 of the EU General Data Protection Regulation 2016/679 (hereinafter, the "GDPR") and how this information is used, shared and how may be accessed, changed or deleted. As proof of its commitment towards privacy, Luxottica part of Luxottica Group S.p.A., has defined this policy within the wider scope of a global management model on privacy, to ensure total compliance with privacy as the foundation of Luxottica's company culture. All personal information supplied by you is used exclusively for the objectives described below.

2. Source and type of personal information

Luxottica may process the following identification personal data provided by the user during the purchasing process when completing the order (e.g. name and surname; e-mail address; gender; country; postal address and phone numbers, and, with your prior consent, in case of purchase of prescription glasses, the health data contained in the prescription to be provided prior to the purchase (hereinafter the "Prescription Information") and other information contained in any correspondence or requests sent by the user).

All the identification data abovementioned are hereinafter jointly defined "information".

3. Purposes of the processing

3.1 Contractual purposes

Save for the Prescription Information, the information collected by Luxottica are used for the following contractual purposes without prior users' consent according to art. 6 (b) GDPR:

- to manage orders, to supply products and services, to process payments, to transmit orders, products, services;
- to register the purchase and for subsequently warranty purposes;
- to comply with the requirements of the laws, regulations, protocols and national and EU legislation;
- for Luxottica's defence in court, for example, in case of violations by the web-users, or in order to protect the rights and the property of Luxottica;
- to fulfil the user's requests (e.g. management of requests for information);
- to send users operational communications related to the supply of the service or products, sales and after sales assistance (such as communications about products availability if requested).

In relation to the Prescription Information, this can be processed by Luxottica only with the user's prior consent pursuant to Article 9 of the GDPR and will be used only for the purposes of performing the contract of purchase of prescription glasses bought by the users.

3.2 Marketing purposes

The information collected by Luxottica are used, with the exclusion of Prescription Information, for the following marketing purposes:

- to participate in and manage promotions and contests as available from time to time on the Website, if any;
- to send commercial and promotional communications and periodical updates (e.g. via e-mail, phone, SMS/MMS, postal service) related to Luxottica's products, services, initiatives and events;
- for the purpose of conducting, by post, telephone or e-mail, statistical analyses, surveys and market research relating to Luxottica's products and services.

In all the above-mentioned cases your information will be used previous your freely given consent unless you are already our customer and we obtained your information in the course of a purchase. In this case, Luxottica may send you commercial emails on similar products, events, fairs and services already provided by Luxottica based on PECR legislation and GDPR legitimate interest. You may opt out at any time by following the instructions available in every communication.

4. Processing modalities

The processing of users' information is made only within the limits necessary to pursue the purposes outlined above and is carried out by means of operations indicated in Article 4 GDPR and namely: collection, registration, organisation, storage, consulting, processing, modification, selection, extraction, comparison, use, interconnection, access and communication, blocking, erasure and destruction of the data. Users' data is processed electronically and manually through the servers in which it is stored.

5. Categories of persons who can access information

Any personal information given or collected will be processed by Luxottica as Data Controller. Personal information will be processed by the Luxottica staff deputed to the processing of the personal information being collected:

- with the exclusion of Prescription Information, employees and consultants in the marketing, finance, administration, accounting and other relevant department of Luxottica, in their capacity as persons in charge of the processing and/or internal data processors.

In addition, Luxottica may request its service providers to carry out some processing operations on its behalf, according to the instructions provided by Luxottica and in line with this Privacy Policy. These providers will process personal information in their capacity as external data processors based on adequate contractual commitments and or letter of appointments, and they include, for instance:

- suppliers of marketing activities

Finally, Information may be accessed by the companies of the Luxottica Group, in their capacity as external data processors, for management of intra-group services (e.g. commercial communications) and the fulfilment of the contractual purposes set forth above, including dispatching the products, managing any claim, analysing data, supplying marketing assistance. In carrying out the activities provided by the subjects above, Luxottica gives operating instructions and rules of conduct on processing personal information in compliance with this Privacy Policy.

6. Third parties to which information can be communicated

In addition, user's information may be communicated to third parties for the following reasons:

- to permit to third companies a merger, acquisition or sale of all or part of Luxottica's assets;

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- to fulfil the obligation provided by the law, regulations, protocols and national and EU legislation;
- to implement laws required by public Authorities;
- to allow Luxottica's defence in court, for example, in case of violations by the users.

The said parties shall process the information in their capacity as autonomous data controllers.

7. Data transfer outside the EU

Luxottica may transfer the information to external data processors listed above and located outside of the European Union (for instance, companies of the Luxottica group or third parties) to allow the activities listed in this Privacy Policy to be carried out (e.g. hosting services). If the personal information will be transferred to countries that do not provide the same level of protection, or in any case an adequate level of protection (e.g. the United States of America), of personal information, we ensure that each service provider enters into specific contractual obligations according to the applicable data protection legislations (including the execution of the Standard Contractual Clauses as approved by the European Commission) unless Luxottica can rely on any other legal basis for transferring personal information.

8. Nature of providing personal information and the consequences of the refusal

Providing information for the contractual purposes is necessary to guarantee to users the use of services offered in section 3.1 of this Privacy Policy. If the user decides not to provide information for the contractual purposes, this may prevent them from using the services listed at section 3.1.

In relation to the Prescription Information, this can be processed for contractual purposes necessary to perform the purchase of prescription glasses, only with the free explicit consent from the relevant customer. However, if the users deny their consent to, it will not be possible for them to purchase prescription glasses. Providing information for the marketing purposes is voluntary and optional. Users' may freely decide not to provide information for the marketing purposes, as well as they may object to the further processing for this purpose: in this case users' information will not be processed for the marketing purposes listed at section 3.2.

9. Safety

All personal information supplied is kept on secure servers and within its internal systems. Luxottica uses adequate safety measures to protect information from non-authorised access or non-authorised changes, and from the circulation or distribution of data. To prevent non-authorised access, to maintain the accuracy of the data and guarantee the proper use of information, Luxottica uses adequate physical, electronic and managerial procedures to safeguard and protect the information and data stored in our system. Although no computer system is completely secure, Luxottica believes that the measures it has implemented reduce the possibility of security problems to an appropriate level for the type of data involved.

Personal information is kept and deleted in accordance with Luxottica security policy for the time necessary to achieve the purposes for which data were collected and further processed, including any retention period required under the applicable legislation (e.g. retention of accounting documentation). Luxottica will process users' information for contractual purposes (section 3.1) for 10 years after the termination of the contract, but Prescription Information will be held for 10 years from the date of the purchase of the prescription glasses. Luxottica will process users' information for marketing purposes for 24 months from the last affirmative action performed by the users (e.g. purchases, expression of interest, etc.). Users' information is processed at the premises of Luxottica and in the places where the servers are located. In case of EU data subjects, the servers are based in EU, while of the other data subjects' servers are based in their relevant country of residence. For further information, contact Luxottica to the details below.

10. Data subject's rights in relation to personal information

Users have the rights referred to in articles 16-21 GDPR (right of confirmation, right to be forgotten, right of processing limitation, right of data portability, right to object) and the right to complain to the Supervisor Authority.

Furthermore, Luxottica offers tools to users to update and amend the personal information given. Indeed, every registered user may access his/her own information and update it (e.g. through dedicated website accessible through the corporate website www.luxottica.com). Besides, it is also possible for users to modify and update their preferences on how they wish to receive e-mails or other communications from Luxottica. Users may also request that their information on their account is deleted.

In order to exercise the rights above and to request information, users may also write to the following e-mail address customerservice@uk.sunglasshut.com. Luxottica will respond within a reasonable time frame (within the limits of applicable law), after verifying users' identity.

11. Contact information

The Data Controller of the processing of users' data is Luxottica Retail UK, Verulam Point, Station Way, St. Albans, Hertfordshire, AL1 5HE. Luxottica is part of the Luxottica Group S.p.a ("Luxottica Group") with offices in 20123 Milan (Italy) Piazzale Cadorna, 3. Luxottica Group has appointed, in compliance with Article 37 co 2 of the GDPR, a Data Protection Officer for all the companies of the Group. The Data Protection Officer, registered to the Italian Data Protection Authority, can be contacted at the following email address: dpo@luxottica.com or to the addresses above indicated.

12. Changes to the Privacy Policy

For legal and/or organizational reasons, this Privacy Policy may undergo changes; we suggest, therefore, to check this Privacy Policy regularly and to refer to the latest version of it. If Luxottica makes any changes that the company believes to be important, users will be advised through the Website.