

PRIVACY POLICY

This Privacy Policy ("Policy") is effective as of October 17, 2024.

This Policy describes how Classic Optical Laboratories, Inc. ("Classic Optical") collects, uses, discloses and safeguards your information. This policy applies to individuals who access this Site. This Policy, together with our [Terms of Use](#), collectively govern your use of this Site.

From time to time, we may change this Policy. If we do, we will post an amended version on this webpage. Please review this Policy periodically.

You may submit a request to exercise rights you may have under applicable state law by submitting an email to privacyoffice@luxotticaretail.com or by calling us toll free at 1-888-522-2020.

The Privacy Policy covers the following topics:

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2. How do we use your information
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1. THE INFORMATION WE COLLECT

For the purpose of this policy, personal information is any information about an identifiable individual. We collect the following types of personal information:

Information You Provide

We may collect the following personal information that you voluntarily provide us in using our Platforms:

- *Create an Account.* If you create an account with us, you will provide us with your name, email address, and you will create a password for future logins.
- *Customer Service.* If you contact our customer service department, you may need to provide us with additional information so that we can respond to your questions or concerns as completely and thoroughly as possible.
- *Apply for a Job.* If you apply for a job through our website, we will collect any information you provide in your application, including, but not limited to, work authorization information, visa status, desired salary, language proficiency, educational background, employment history, and references. You may also choose to voluntarily provide optional information such as race, gender, or whether you are disabled.
- *Business Information.* We may collect personal information from business clients or vendors, including company name, physical address, phone number, and email address.
- *HIPAA.* Some of the affiliates and brands covered by this Policy are subject to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). These affiliates and brands may collect additional information that is considered "protected health information" ("PHI") as defined by HIPAA. When the information that we collect is considered PHI, we will handle that information in accordance with our Notice of Privacy Practices. Please visit that notice for information on our privacy practices, our legal duties, and your rights concerning your PHI.

2. HOW DO WE USE YOUR INFORMATION

We use the personal information we collect to improve our Site and to protect our legal rights. In addition, we may use the personal information we collect to:

- Process your account registration;
- Identify your preferences to customize our communications and marketing;
- Manage and record your settings, consents, communications and opt-out choices;

- Review your job application;
- Communicate with you about our Site or to inform you of any changes to our Site;
- Operate and improve the Site;
- Create audiences for our advertisements;
- Communicate with you, including responding to your inquiries;
- Comply with the law and to maintain the integrity and security of our Site;
- Defend our legal rights and the rights of others;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use and to otherwise fulfill our legal obligations; and
- Fulfill any other purposes for which you provide it, or any other purpose we deem necessary or appropriate.

3. SHARING INFORMATION WITH THIRD PARTIES

We may share the personal information that we collect about you in the following ways:

- We engage service providers to perform services in connection with the operation of our business. We may share personal information with service providers to the extent necessary for them to provide services to you or us that are aligned with the purposes outlined above. Examples of these services include payment processing and authorization, text messaging services, fraud protection and credit risk reduction, product customization, order fulfillment and shipping, marketing and promotional material distribution, website evaluation, data analysis and, where applicable, data enrichment and/or cleansing.
- Personal information collected through our Site may be shared between the brands and affiliates, including future affiliates that are owned or operated by Classic Optical.
- We may release personal information if we believe in good faith that: (i) the law or legal process requires it; (ii) we have received a valid administrative request from a law enforcement agency; or (iii) such release is necessary or appropriate (in our sole discretion) to protect the rights, property, or safety of Classic Optical, or any of our respective affiliates, service providers, customers, or (iv) as Classic Optical deems necessary to resolve disputes, troubleshoot problems, prevent fraud and otherwise enforce the Terms of Use.
- We may also share your information with your consent or as otherwise disclosed at the time of data collection or sharing.
- As with any business, it is possible that as ours develops, we might go through a business transition, such as a merger, acquisition by another company, or the sale of all or a portion of our assets, or buying online stores or other assets, including at bankruptcy. In such transactions, information about customers will likely be transferred.
- We are a multi-national organization with locations in many countries around the world. Your personal information may be stored and processed outside of your country, province or state of residence, in any jurisdiction where we have facilities or in which we engage service providers, to the extent allowed in accordance with applicable law. This means that your personal information may be transferred in jurisdictions that have less restrictive privacy laws than your

country, province, or state of residence, in which case we will ensure, through contractual means or otherwise, that it will receive an adequate protection in compliance with generally accepted data protection principles. We take steps to process personal information according to the provisions of this Privacy Policy and the requirements of applicable law.

4. THIRD-PARTY LINKS & PLUG-IN

The Site may provide links to third-party websites or apps, including our social media pages. We do not control the privacy practices of those websites or apps, and they are not covered by this Policy. You should review the privacy policies of other websites or apps that you use to learn about their data practices.

The Site may also include integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share information or you otherwise interact with social media features on the Site, those social media companies may collect information about you and may use and share such information in accordance with their own policies, including by sharing such information with us or the general public. Your interactions with third-party social media companies and the use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to read the privacy policies for any social media accounts you create and use.

5. YOUR STATE PRIVACY RIGHTS

Depending on the state in which you reside, you may have certain privacy rights regarding your personal data. Please review the sections below if you are a California, Nevada, *Virginia*, or *Oregon* resident. For other state residents, your privacy rights may include (if applicable):

- The right to confirm whether or not we are processing your personal data and to access such personal data and the categories of personal data we are processing or have processed;
- The right to obtain a copy of your personal data that we collected from and/or about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another controller without hindrance, where the processing is carried out by automated means;
- The right to delete personal data that we collected from and/or about you, subject to certain exceptions;
- The right to correct inaccurate personal data that we maintain about you, subject to certain exceptions;
- The right, if applicable, to opt out of the processing of your personal data for purposes of (1) targeted advertising; (2) the “sale” of your personal data (as that term is defined by applicable law); and (3) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;

- If we are required by applicable law to obtain your consent to process sensitive personal data, the right to withdraw your consent; and
- The right not to receive discriminatory treatment by us for the exercise of your privacy rights.

To exercise your rights, please submit a request by emailing us at privacyoffice@luxotticaretail.com. If legally required, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the individual on whose behalf you are making such request. To do so, we will ask you to verify data points based on information we have in our records. If you are submitting a request on behalf of another individual, please use the same contact methods described above. If we refuse to take action regarding your request, you may appeal our decision by emailing us at privacyoffice@luxotticaretail.com.

6. NOTICE TO NEVADA RESIDENTS

Nevada law allows Nevada residents to opt out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. We currently do not sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt out of sales and will record your instructions and incorporate them in the future if our policy changes. You may send opt-out requests to privacyoffice@luxotticaretail.com.

7. NOTICE TO VIRGINIA RESIDENTS

The Virginia Consumer Data Protection Act (“VCDPA”) provides Virginia residents with the right to receive certain disclosures regarding the personal data we process about them. For purposes of this section, personal data means any information that is linked or reasonably linkable to an identified or identifiable natural person. Personal data does not include de-identified or publicly available information as the VCDPA defines those terms.

For a discussion of the categories of personal data we process, the purposes for our processing, the categories of personal data that we share with third parties, and the categories of third parties with whom we share personal data, please see Section 1 through 3 above, and Section 8 below.

If you are a Virginia resident, the VCDPA grants you the right to: (1) confirm whether or not we are processing your personal data to access such personal data; (2) correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data; (3) delete personal data you have provided or we have obtained about you; (4) obtain a copy of your personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance, where the processing is carried out by automated means; and (5) opt out of the processing of your personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

To exercise your rights, please email us at privacyoffice@luxotticaretail.com, with your name, the fact that you are a Virginia resident, and specifying the right(s) you wish to invoke. If we refuse to take action regarding your request, you may appeal our decision by email us at privacyoffice@luxotticaretail.com.

8. NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and of the rights of California residents regarding their personal information. This section of the Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this section does not apply to you and you should not rely on it.

The CCPA defines "personal information" to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this "**NOTICE TO CALIFORNIA RESIDENTS**" section we will refer to this information as "Personal Information."

If you are a California resident and a current or former employee, job applicant, or independent contractor of ours, please see our privacy notice available on our job applicant website(s) for more information on our collection and use of your Personal Information in that capacity.

Notice at Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated date of this Policy, have collected the following categories of Personal Information:

- Identifiers (name, postal address, online identifier, Internet Protocol address, email address, national provider identifier)

In addition to the purposes stated above in the Section "**HOW WE USE YOUR INFORMATION**" we currently collect and have collected and sold the above categories of Personal Information for the following business or commercial purposes:

- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services
- Providing advertising and marketing services, except for cross-context behavioral advertising, to you provided that, for the purpose of advertising and marketing, our service providers and/or contractors shall not combine the Personal Information of opted-out consumers that the service provider or contractor receives from us, or on our behalf with Personal Information that the

service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with you

Sale, Sharing, and Disclosure of Personal Information

We have not sold or shared information in the 12 months preceding the Last Updated date of this Privacy Policy.

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed Personal Information.

Category of Personal Information	Categories of Recipients
Identifiers (name, postal address, online identifier, Internet Protocol address, email address)	Subsidiaries and affiliates; marketing service providers; operating systems and platforms

We disclosed Personal Information for the following business or commercial purposes:

- Performing services including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services

We do not knowingly collect, sell, or share the Personal Information of consumers under 16 years of age. We do not use Sensitive Personal Information for purposes other than those the CCPA and its regulations allow for.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Your Rights

If you are a California resident, you have the following rights with respect to your Personal Information:

- (1) The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose for collecting, selling or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;

- (2) The right to delete Personal Information that we collected from you, subject to certain exceptions;
- (3) The right to correct inaccurate Personal Information that we maintain about you;
- (4) If we sell or share Personal Information, the right to opt out of the sale or sharing;
- (5) If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
- (6) The right not to receive discriminatory treatment by us for the exercise of privacy rights the CCPA confers.

How to Submit a Request to Know, Delete, and/or Correct

You may submit a request to know, delete, and/or correct to privacyoffice@luxotticaretail.com or by calling us toll free at 1-888-522-2020.

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

Our Process for Verifying a Request to Know, Delete, and/or Correct

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request.

We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable.

For requests to access categories of Personal Information and for requests to delete or correct Personal Information that is not sensitive and does not pose a risk of harm by unauthorized deletion or correction, we will verify your identity to a “reasonable degree of certainty” by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities.

For requests to access specific pieces of Personal Information or for requests to delete or correct Personal Information that is sensitive and poses a risk of harm by unauthorized deletion or correction, we will verify your identity to a “reasonably high degree of certainty” by verifying at least three pieces of Personal Information you previously provided to us and which we have determined to be reliable for the purpose of verifying identities. In addition, you must submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

Right to Opt Out of Sale or Sharing of Personal Information

We do not sell or share personal information.

Shine the Light Law

If you are a California resident, California Civil Code § 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes (as those terms are defined in that statute). To make such a request, please send an email to privacyoffice@luxotticaretail.com with the subject line "Shine the Light Request."

9. NOTICE TO OREGON RESIDENTS

Oregon Consumer Privacy Act ("OCPA") provides residents of Oregon with the right to receive certain disclosures regarding the personal data we process about them. For purposes of this section, personal data means any information that is linked or reasonably linkable to an identified or identifiable natural person.

Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated date of this Policy, have collected the following categories of Personal Information. Not all categories will be collected or received for every individual. For more information on the categories of personal data we collect, please see "The Information We Collect" section of this Site's privacy policy.

- Identifiers (name, postal address, online identifier, Internet Protocol address, email address)

In addition to the purposes stated above in the Section "How Do We use Your Information" we currently collect and have collected and sold the above categories of Personal Information for the following business or commercial purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us
- Advancing our commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

Sale, Sharing, and Disclosure of Personal Information

We have not sold or shared information in the 12 months preceding the Last Updated date of this Privacy Policy.

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed Personal Information.

Category of Personal Information	Categories of Recipients
Identifiers (name, postal address, online identifier, Internet Protocol address, email address)	Subsidiaries and affiliates; marketing service providers; operating systems and platforms

We disclosed Personal Information for the following business or commercial purposes:

- Performing services including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services

We do not knowingly collect, sell, or share the Personal Information of consumers under 16 years of age. We do not use Sensitive Personal Information for purposes other than those the OCPA and its regulations allow for.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Your Rights

Generally, Oregon consumers have the following rights:

- The right to access personal data that has been collected about them and confirmation of the categories of personal data that have been processed by a controller;
- The right to know a list of the specific third parties that have received their personal data or any personal data from a controller;
- The right to correct inaccuracies in their personal data;
- The right to request their personal data to be deleted;
- The right to obtain a copy of their personal data; and
- The right to say “no” to (opt-out of) a controller doing certain things with their personal data.

How to Submit a Request to Exercise Your Rights

To exercise your rights, please submit a request by emailing us at privacyoffice@luxotticaretail.com. If legally required, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the individual on whose behalf you are making such request. To do so, we will

ask you to verify data points based on information we have in our records. If you are submitting a request on behalf of another individual, please use the same contact methods described above. If we refuse to take action regarding your request, you may appeal our decision by emailing us at privacyoffice@luxotticaretail.com.

Our Process for Verifying a Request to Exercise Your Rights

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the resident of Oregon on whose behalf you are making such request.

We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable.

For requests to access categories of Personal Information and for requests to delete or correct Personal Information that is not sensitive and does not pose a risk of harm by unauthorized deletion or correction, we will verify your identity to a “reasonable degree of certainty” by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities.

For requests to access specific pieces of Personal Information or for requests to delete or correct Personal Information that is sensitive and poses a risk of harm by unauthorized deletion or correction, we will verify your identity to a “reasonably high degree of certainty” by verifying at least three pieces of Personal Information you previously provided to us and which we have determined to be reliable for the purpose of verifying identities. In addition, you must submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.

Right to Opt Out of Sale or Sharing of Personal Information

We do not sell or share personal information.

10. NOTICE TO CANADA RESIDENTS

Please see Parts 1-3, above, for a description of the personal information held by us, a general account of its use, and what personal information we make available to related organizations. Subject to exceptions set out in privacy legislation, residents of Canada may request to view, update, or correct their personal information by contacting our privacy officer at the information provided in the “**CONTACT**” section below. In order to protect your privacy, we will take steps to verify your identity before granting you access to the information or enabling you to make corrections. Please keep in mind that certain information may be subject to exceptions if, for example, the information is protected by solicitor-client privilege, part of a formal dispute resolution process, about another individual that would reveal their personal information or confidential commercial information, or would be prohibitively expensive to provide. In some instances, you may have consented to the collection of your personal information. Subject to legal and contractual requirements and reasonable notice, you may withdraw your consent at

any time; however, without your consent, we may not be able to provide you with our services or products if your personal information is necessary for us to be able to provide them.

11. YOUR CHOICES

To opt out of our email marketing or to unsubscribe from our email newsletters, you can contact our customer service department using the information in the **“CONTACT”** section below, or you can use the link provided at the bottom of each marketing message or newsletter. If you choose to opt out, you will continue to receive all email communications related to our transaction with you.

If you would like to update your mailing information or want your name and address removed from our direct mailing list, you can contact our customer service department using the information in the **“CONTACT”** section below.

We obtain your consent before contacting you with certain non-emergency, automated, autodialed, prerecorded, or other telemarketing phone calls or text messages. You are not required to grant consent to telemarketing calls or texts as a condition of buying any goods or services. Also, you may revoke your consent at any time at the contact information listed at the end of this policy. Message and data rates may apply. We will retain your personal information for the period necessarily to fulfill the purposes of your personal information collection, unless a longer retention period is required or permitted by law.

12. CHILDREN’S PRIVACY

We understand the importance of protecting children’s privacy, especially in an online environment. Our Platforms are not intentionally designed for or directed at children less than 16 years of age. We do not knowingly collect personal information from children under the age of 16 without the consent of the child’s parent or guardian. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any personal information relating to children that we have collected, we will take steps to securely remove it from our systems.

13. UPDATING YOUR INFORMATION

You may request to view, update, or correct your personal information by contacting our privacy office at the information provided in the **“CONTACT”** section below. In order to protect your privacy, we will take steps to verify your identity before granting you access to the information or enabling you to make corrections.

14. SECURITY

We maintain reasonable and appropriate safeguards to help protect your personal information from loss and from unauthorized acquisition. We monitor activity on our Platforms to prevent any unauthorized disclosure of information. In addition, we utilize a licensed system for credit card authorization and fraud detection. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal information, we cannot guarantee absolute security.

15. DO NOT TRACK SIGNALS

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but we are not responsible for the completeness or accuracy of this third-party information.

16. TRACKING ACROSS TIME AND TECHNOLOGIES DISCLOSURE:

Some information about your use of the service and certain third-party services may be collected by us or by third parties using tracking technologies across time and services and used by us and third parties for purposes such as to associate different devices you use and deliver relevant ads and/or other content to you on the service and certain third-party services.

17. CONSUMERS WITH DISABILITIES

We are committed to ensuring this Policy is accessible to individuals with disabilities. To request this Policy in an alternative format, please reach out to us at the Contact information provided below.

18. CONTACT

If you have questions or wish to contact us about this Policy, please direct inquiries to:

Privacy Officer
Luxottica Retail North America, Inc.
4000 Luxottica Place
Mason, Ohio 45040
Phone: 1-800-776-4085
Email: privacyoffice@luxotticaretail.com