

Welcome to the ESSILOR LTD's booking platform **privacy policy**.

Essilor Ltd respects your **privacy** and is committed to protecting your personal data. This **privacy policy** will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your **privacy** rights and how the law protects you.

This **privacy policy** is provided in a layered format. Please also use the Glossary to understand the meaning of some of the terms used in this **privacy policy**.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This **privacy policy** aims to give you information on how Essilor Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you :

For Eye Care Professionals (« ECPs »):

- Set up an account to benefit from the appointment service made available to you through the Company's store locator ;

For consumers :

- Set up an account to make an appointment with an Eye Care Professional.

This website is not intended for children (below 16 years of age) and we do not knowingly collect data relating to children. Appointment made for children may only be made by a responsible adult under his/her name.

IDENTITY AND DIRECTIONS OF THE CONTROLLER

Legal reminder: the controller is the person who determined the means and purpose of the processing. The processor is a person collecting personal data for the use of the controller.

Processor acts under the authority and control of the controller and on the basis of its instructions.

The controller for the personal data is:

1. For the personal data collected while the consumer/final user is taking the appointment with the business user in his agenda: the business user with whom the consumer is booking the appointment in his agenda. Essilor Ltd acts as processor and upon instruction of the business user
2. For the personal data from the consumer in the setting up of its account or while navigating on the website and in the creation of statistics on the use of the tool, their computation and anonymisation: Essilor Ltd, Cooper Road, Thornbury, BS35 3UW, UK.

Whether it is a controller or a processor, **Essilor Ltd** takes appropriate measures to ensure the protection and confidentiality of the Personal Data it holds or processes.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you directly or through the use of cookies which we have grouped together as follows:

Data collected as processor :

- **Identity Data** includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes [internet protocol (IP) address, your login data, passwords browser type and version, **time zone setting and location**, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website].
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.

Data collected as controller :

- **Identity Data** includes First name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, passwords browser type and version, **time zone setting and location**, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for statistical purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this **privacy policy**.

We do not collect any **Sensitive Category of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services and in particular the appointment module;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our **cookie policy** for further details.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

For ECPs

- Where we need to provide appointment services

For consumers :

- When we need to deliver confirmation or reminders on an appointment

Essilor Ltd processes your personal data to provide and administer services to perform tasks relating to the administration of the appointment platform you are using. This data processing is based on your consent. These services include, but are not limited to collecting appointments' requests and ensuring their proper processing. A complete list of these processing purposes can be found in the table in sections 4 and 8 of this Privacy Policy.

Essilor Ltd relies on your consent to process your personal data. You do not have to provide your consent and you can withdraw your consent at any time.

We need your consent in the following cases:

- to be able to send you appointment confirmation emails
- to send you appointment reminder emails
- to send you satisfaction emails after an appointment
- to send you appointment renewal emails
- to send you product marketing emails
- to send you confirmation by SMS and reminders
- for remarketing purposes.

If consent is not provided

If you do not provide your consent for Essilor Ltd to process your personal data for a specific service that is offered under the lawful basis of your consent then we might not be able to provide that service to you in full.

The right to withdraw consent

Where Essilor Ltd is relying on your consent to process your personal data, you have the right to withdraw your consent at any time. If you are unsure how to withdraw your consent please contact the following address: dp-request@essilor.co.uk

You can only withdraw your consent for data processing operations for which Essilor Ltd relies on consent to process the data .

You have the following different rights regarding the personal data that may be processed:

- you have the right of access to your data
- you have the right to correct your data if it is incorrect
- you have the right to ask for your data to be deleted
- you have the right to ask for a copy of your data to be transferred to another organisation
- you have the right to withdraw your consent at any time
- you have the right to be transferred to another organization
- you have the right to object to your data being processed for a specific purpose
- you have the right to request that the processing of your data be restricted for a certain period of time.

If you wish to exercise your rights please contact the following address: dp-request@essilor.co.uk

Standard policies for processing Data transfers

- Your personal data is shared with other organisations Essilor Ltd has a lawful agreement with to process information on its behalf. We will share your personal data with third-parties including service providers.
- If you consent to receive communications and/or marketing material from Essilor Ltd, we will share your personal data with external service providers.
- Your personal data may be used for research or analysis purposes.
- Your personal data may also be used by our auditors to assess our compliance with standards and regulations.
- A full list of these organisations is [available here](#).
- Your personal data is shared using secure transfer methods .

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Business User To register you and your stores as a new beneficiary of the appointment tool	(a) Identity (b) Contact	Consent
Customer To register you and enable you to make an appointment with the Business User and to be able to send you confirmation and information regarding the status of your appointment as well as reminders in relation to said appointments for up to 24 months as from the initial appointment	(a) Identity (b) Contact	Contract for performance of a service & consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Contract for performance of a service & consent (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) consent & contract for performance of a service (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and this website	(a) Identity	(a) Necessary for our legitimate interests (for running our business,

(including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Consent (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Consent (b) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Consent (b) Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by [emailing us](#). You can also manage your email preferences and unsubscribe at any time by clicking unsubscribe at the bottom of our emails.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure 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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for [six] years after they cease being customers for [tax] purposes.

Purpose/Activity	Type of data	Data retention period
Business User	(a) Identity	Business contract length

To register you and your stores as a new beneficiary of the appointment tool	(b) Contact	
Customer To register you and enable you to make an appointment with the Business User and to be able to send you confirmation and information regarding the status of your appointment as well as reminders in relation to said appointments for up to 24 months as from the initial appointment	(a) Identity (b) Contact	24 months after making an appointment
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Time of the contractual relationship 3 months after the end of the survey
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	3 months after the end of the survey
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	24 months
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	24 months

	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	24 months
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	24 months

In some circumstances you can ask us to delete your data: see [*your legal rights*] below for further information.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.* **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- *Request correction of your personal data.* **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- *Request erasure of your personal data.* **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- *Object to processing of your personal data.* **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

- *Request restriction of processing your personal data.* **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- *Request the portability of your personal data.* **Request the portability** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- *Right to withdraw consent.* **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the following address: dp-request@essilor.co.uk.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are

overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Giving your consent means that is any free, specific, informed and unambiguous manifestation of your will by which you accept, by a declaration or by a clear positive act, that personal data concerning you may be processed.

Public interest mission means that data processing is carried out by public authorities for the purpose of carrying out their tasks.

Safeguarding the vital interests of the person means that the processing is necessary to protect the vital interests of the data subject or of another natural person, in the event that the data subject is physically or legally incapable of giving his consent.

THIRD PARTIES

INTERNAL THIRD PARTIES

Internal Third Parties refer to other companies in the Essilor Group acting as joint controllers or processors and who are based in France and provide IT and system administration services and undertakes leadership reporting.

EXTERNAL THIRD PARTIES

External Third Parties refer to:

- Service providers Amazon Web Services acting as processors based in Dublin, Ireland who provide IT and system administration services. Managed by Claranet based in Paris, France.
- Service providers Salesforce.com acting as processors based in Germany who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom and Ireland who provide consultancy, banking, legal, insurance and accounting services.
- Tax administrations regulators and other authorities acting as processors or joint controllers based the United Kingdom and Ireland who require reporting of processing activities in certain circumstances.

10. ADDITIONAL INFORMATION

CONTACT DETAILS

If you have any questions about this **privacy policy** or our **privacy** practices, please contact our DPO in the following ways:

Full name of legal entity: Essilor Ltd

Email address: dp-request@essilor.co.uk

Postal address: Essilor Ltd, Cooper Road, Thornbury, BS35 3UW, UK

You have the right to make a complaint at any time to the Court of England and Wales.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our **privacy policy** under regular review. This version was last updated on 01/03/2021. Historic versions are archived here **OR** can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their **privacy** statements. When you leave our website, we encourage you to read the **privacy policy** of every website you visit.