

# PRIVACY POLICY

## Swiss Eyewear Group (International) AG

Version from 16.08.2023

We are pleased that you visit our online store and thank you for your interest in our products. The protection of your privacy is of utmost importance to us. Below we inform you in detail about the handling of your data.

In this privacy statement, we, the Swiss Eyewear Group (International) AG, explain how we collect and otherwise process personal data. This is not an exhaustive description; other data protection declarations or general terms and conditions, conditions of participation and similar documents may regulate specific matters. Personal data is understood to be all information that relates to a specific or identifiable person.

If you provide us with personal data of other persons (e.g. family members, data of work colleagues), please make sure that these persons are aware of this privacy policy and only share their personal data with us if you are allowed to do so and if this personal data is correct.

This Privacy Policy is designed to comply with the requirements of the EU General Data Protection Regulation ("GDPR"), the Swiss Data Protection Act ("DPA") and the revised Swiss Data Protection Act ("revDSG"). However, whether and to what extent these laws are applicable depends on the individual case.

## 1. RESPONSIBLE PARTY

The data controller for the data processing activities we describe here is Jerry Dreifuss, unless otherwise indicated in a particular case. If you have any concerns regarding data protection, you can send them to us at the following contact address:

Swiss Eyewear Group (International) AG  
Jerry Dreifuss  
Freilagerstr. 39  
8047 Zürich  
E-Mail: [contact@swisseg.com](mailto:contact@swisseg.com)  
Website: <https://my.swisseg.com/>

## 2. COLLECTION AND PROCESSING OF PERSONAL DATA

We primarily process the personal data that we receive from our customers and other business partners in the course of our business relationship with them and other persons involved in it, or that we collect from their users when operating our websites, apps and other applications.

To the extent permitted, we also take certain data from publicly accessible sources (e.g. debt enforcement registers, land registers, commercial registers, press, Internet) or receive such data from other companies within the Swiss Eyewear Group, from authorities and other third parties (such as credit agencies, address dealers). In addition to the data about you

that you give us directly, the categories of personal data we receive about you from third parties include, in particular, information from public registers, information that we learn in connection with official and legal proceedings, information in connection with your professional functions and activities (so that we can, for example (e.g. so that we can conclude and process transactions with your employer with your help), information about you in correspondence and meetings with third parties, creditworthiness information (insofar as we process transactions with you personally), information about you that people close to you (family, advisors, legal representatives, etc.) give us so that we can conclude or process contracts with you or involving you (e.g. references, your address for deliveries, full addresses, etc.). references, your address for deliveries, powers of attorney, information on compliance with legal requirements such as anti-money laundering and export restrictions, information from banks, insurance companies, sales and other contractual partners of ours on the use or provision of services by you (e.g. payments made, purchases made)), information from the media and Internet about you (where this is appropriate in the specific case, e.g. in the context of a job application, press releases, etc.). e.g. in the context of an application, press review, marketing/sales, etc.), your addresses and, if applicable, interests and other sociodemographic data (for marketing), data in connection with the use of the website (e.g. IP address, MAC address of the smartphone or computer, information about your device and settings, cookies, date and time of visit, pages and content accessed, functions used, referring website, location information).

### 2.1 Visiting the website

When you visit our website, various information is automatically collected by our hosting provider's system. This includes, for example, your IP address, date and time of access, pages visited, type of browser used and operating system. This information is only used for statistical evaluations to improve our services and is generally not directly personal.

### 2.2 Order process

When you place an order in our online store, we collect the personal data necessary for processing, such as your name, address, e-mail address, payment information and order history. We use this data exclusively to process your order and to communicate with you.

### 2.3 Customer account

You have the option to create a customer account in which your order history and personal data will be stored. The use of a customer account facilitates future orders, because you do not have to enter your data again. The data in the customer account will be treated confidentially by us and will not be passed on to third parties.

### 2.4 Newsletter registration

If you register for our newsletter, we will use the e-mail address you provide to send you regular information about our products, offers and news. The registration for the newsletter is voluntary and requires your consent. You can unsubscribe from the newsletter at any time by using the corresponding link at the end of each newsletter or by informing us via the contact details above. Your e-mail address will then be deleted from our distribution list immediately.

### 3. COOKIES / TRACKING AND OTHER TECHNOLOGIES IN CONNECTION WITH THE USE OF OUR WEBSITE

We typically use “cookies” and similar technologies on our website to identify your browser or device. A cookie is a small file that is sent to your computer or automatically stored on your computer or mobile device by the web browser you are using when you visit our website.

This allows us to recognize you when you return to this website, even if we do not know who you are. In addition to cookies that are only used during a session and deleted after your website visit (“session cookies”), cookies can also be used to store user settings and other information for a certain period of time (e.g. two years) (“permanent cookies”).

However, you can set your browser to reject cookies, store them for one session only, or otherwise delete them early. Most browsers are preset to accept cookies. We use persistent cookies to store user preferences (e.g., language, autologin) so that we can better understand how you use our offerings and content. Certain of the cookies are set by us, and certain are also set by contractors with whom we work. If you block cookies, certain functionalities (such as language selection, shopping cart, ordering processes) may no longer work.

We also include visible and invisible image elements in our newsletters and other marketing e-mails, in part and to the extent permitted, by retrieving them from our servers we can determine whether and when you have opened the e-mail so that we can also measure and better understand how you use our offers and tailor them to you. You can block this in your email program; most are preset to do so.

By using our websites and agreeing to receive newsletters and other marketing emails, you consent to the use of these techniques. If you do not want this, you must set your browser or e-mail program accordingly, unless this can be adjusted via the settings.

We sometimes use Google Analytics or similar services on our websites. This is a service provided by third parties who may be located in any country in the world (in the case of Google Analytics, it is Google Ireland (based in Ireland), Google Ireland relies on Google LLC (based in the USA) as an order processor (both “Google”), [www.google.com](http://www.google.com)), with which we can measure and evaluate the use of the website (not on a personal basis).

Permanent cookies set by the service provider are also used for this purpose. We have configured the service so that the IP addresses of visitors are shortened by Google in Europe before being forwarded to the USA and thus cannot be traced. We have turned off the “Data Forwarding” and “Signals” settings. Although we can assume that the information we share with Google is not personal data for Google, it is possible that Google can draw conclusions about the identity of visitors from this data for its own purposes, create personal profiles and link this data to the Google accounts of these individuals. Insofar as you have registered with the service provider yourself, the service provider also knows you. The processing of your personal data by the service provider then takes place under the responsibility of the service provider in accordance with its data protection provisions. The service provider only informs us how our respective website is used (no information about you personally).

Permanent cookies set by the service provider are also used for this purpose. We have configured the service so that the IP addresses of visitors are shortened by Google in Europe before being forwarded to the USA and thus cannot be traced. We have turned off the “Data Forwarding” and “Signals” settings. Although we can assume that the information we share with Google is not personal data for Google, it is possible that Google can draw conclusions about the identity of visitors from this data for its own purposes, create personal profiles and link this data to the Google accounts of these individuals. Insofar as you have registered with the service provider yourself, the service provider also knows you. The processing of your personal data by the service provider then takes place under the responsibility of the service provider in accordance with its data protection provisions. The service provider only informs us how our respective website is used (no information about you personally).

We also use so-called plug-ins from social networks such as Facebook, Twitter, YouTube, Pinterest or Instagram on our websites. This is apparent to you in each case (typically via corresponding icons). We have configured these elements so that they are disabled by default. If you activate them (by clicking on them), the operators of the respective social networks can register that you are on our website and where and can use this information for their purposes. The processing of your personal data is then the responsibility of this operator according to its data protection regulations. We do not receive any information about you from him.

### 4. DATA TRANSFER AND DATA TRANSFER ABROAD

In the course of our business activities and for the purposes set out in section 3, we also disclose personal data to third parties, insofar as this is permitted and appears to us to be appropriate, either because they process it for us or because they want to use it for their own purposes. This concerns in particular the following entities:

- Service providers of us (within the Swiss Eyewear Group, as well as externally, such as banks, insurance companies), including
- order processors (such as IT providers);
- Dealers, suppliers, subcontractors and other business partners;
- customers;
- domestic and foreign authorities, official agencies or courts;
- Media;
- The public, including visitors to websites and social media;
- Competitors, industry organizations, associations, organizations and other bodies;
- acquirers or parties interested in acquiring business units, companies or other parts of the Swiss Eyewear Group;
- other parties in potential or actual legal proceedings;

Other companies of the Swiss Eyewear Group; all joint recipients.

These recipients are partly domestic, but may be anywhere in the world. In particular, you should expect your information to be transferred to all countries in which Swiss Eyewear Group is represented by group companies, branches or other offices.

If a recipient is located in a country without adequate legal data protection, we contractually obligate the recipient to comply with the applicable data protection laws (for this

purpose, we use the revised standard contractual clauses of the European Commission, which are available here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?), unless the recipient is already subject to a legally recognized set of rules to ensure data protection and we cannot rely on an exception. An exception may apply in particular in the case of legal proceedings abroad, but also in cases of overriding public interests or if the execution of a contract requires such disclosure, if you have given your consent or if it is a matter of data made generally available by you, the processing of which you have not objected to.

## 5. DURATION OF STORAGE OF PERSONAL DATA

We process and store your personal data as long as it is necessary for the fulfillment of our contractual and legal obligations or otherwise the purposes pursued with the processing, i.e. for example for the duration of the entire business relationship (from the initiation, processing to the termination of a contract) as well as beyond that in accordance with the legal storage and documentation obligations.

In this context, it is possible that personal data will be retained for the time during which claims can be asserted against our company and insofar as we are otherwise legally obligated to do so or legitimate business interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymized as a matter of principle and to the extent possible.

For operational data (e.g., system logs, logs), shorter retention periods of twelve months or less generally apply.

## 6. DATA SECURITY

We take appropriate technical and organizational security precautions to protect your personal data from unauthorized access and misuse.

## 7. OBLIGATION TO PROVIDE PERSONAL DATA

Within the scope of our business relationship, you must provide those personal data that are necessary for the establishment and implementation of a business relationship and the fulfillment of the associated contractual obligations (you do not generally have a legal obligation to provide us with data). Without this data, we will generally not be able to enter into or perform a contract with you (or the entity or person you represent). Also, the Website cannot be used if certain traffic-securing information (such as IP address) is not disclosed.

## 8. PROFILING

We process your personal data partially automated with the aim of evaluating certain personal aspects (profiling). We use profiling in particular to be able to inform and advise you about products in a targeted manner. In doing so, we use evaluation tools that enable us to provide needs-based communication and advertising, including market and opinion research.

## 9. RIGHTS OF THE DATA SUBJECT

Within the framework of the data protection law applicable to you and insofar as provided therein (such as in the case of the GDPR), you have the right to information, correction, deletion, the right to restrict data processing and otherwise object to our data processing, in particular that for the purposes of direct marketing, profiling operated for direct advertising and other legitimate interests in the processing, as well as to the release of certain personal data for the purpose of transfer to another entity (so-called data portability).

Please note, however, that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, have an overriding interest in doing so (insofar as we are entitled to rely on this) or require it for the assertion of claims.

If you incur costs, we will inform you in advance. We have already informed you about the possibility of revoking your consent in section 3. Please note that the exercise of these rights may conflict with contractual agreements and may have consequences such as the premature termination of the contract or cost consequences. We will inform you in advance if this is not already contractually regulated.

The exercise of such rights usually requires that you clearly prove your identity (e.g. by means of a copy of your identity card, where your identity is otherwise not clear or cannot be verified). To assert your rights, you can contact us at the address given in section 1.

Every data subject also has the right to enforce his or her claims in court or to file a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## 10. CHANGES

We may amend this privacy policy at any time without prior notice. The current version published on our website shall apply. To the extent that the Privacy Policy is part of an agreement with you, we will notify you of the change by email or other appropriate means in the event of an update.