

PRIVACY POLICY – "CUSTOMER CARE"

This information note describes the purposes and methods by which Safilo S.p.A., in its capacity as data controller (the "Data Controller" or the "Company"), collects and processes the personal data ("Data") provided by you during the interaction with our Customer Care ("CC") and the related services offered by it. The information contained in this policy is provided pursuant to Articles 13 and 14 of Regulation 2016/679/EU of 27 April 2016 ("GDPR").

1. Contact details of the Data Controller and the Data Protection Officer

The Data Controller is the company Safilo S.p.A. with registered office in Padua, in via Settima Strada n. 15, 35129, which can be contacted at the following e-mail address, info@safilo.com.

Safilo S.p.A. has appointed a Data Protection Officer, who can be contacted at the following e-mail address: dpo@safilo.com.

In relation to the processing of personal data carried out for the purpose of managing product purchases, please refer to the information note provided by the Company or the relevant branch, with which it has a business relationship.

2. Categories and sources of processed data

The Data that the Company may process, within the limits of the purposes and methods described in this policy, are contact data (name and surname, e-mail addresses, telephone numbers). The Company does not process judicial data or data belonging to special categories (art. 9 GDPR), therefore the data subject is invited not to provide such information during phone calls with operators, unless any communication of particular data is relevant to your telephone request, in which case the Company will process them exclusively for this purpose. The Data collected relate to natural persons or legal representatives, attorneys, employees, persons in charge of managing the contractual relationship, as well as, for partnerships and sole proprietorships only, the bank name and details.

If you do not provide them directly, your Data may be communicated to the Data Controller by the companies and subsidiaries of the Safilo group, the list of which is shown at the bottom of this policy.

3. Purposes of processing and legal bases

The Company may process your Data for the following purposes:

1. Handling, management and processing of requests sent to the Company through the channels provided (including e-mail, telephone channel and WhatsApp), of any purchase orders directed to Safilo S.p.A. and activities in support of customers;

Legal basis: provision of services expressly requested by you as a data subject (art. 6, par. 1, lett. (b), of the GDPR): *"the processing is necessary for the performance of a contract, to which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same"*. The provision of Data is optional, but necessary for the provision of the

requested service. Therefore, if you do not provide the Data, the Company will not be able to follow up on your request.

2. Recording of telephone calls with Customer Care staff for the purpose of controlling the quality and effectiveness of the assistance services offered directly by the Company, in order to adequately guide the training actions of the personnel in charge and improve the service provided. For this purpose and with your express consent, the telephone conversation with our staff may be recorded.

Legal basis: your explicit consent, as a data subject (art. 6, par. 1, lett. (a), of the GDPR): *"the data subject has expressed consent to the processing of his or her personal data for one or more specific purposes"*.

The provision of Data and the recording of the phone call are optional. Failure to provide such data will make it impossible for the Company to satisfy, via telephone channel, the requests of the data subject who may in any case contact customer service by e-mail.

In particular, at the beginning of the call, the data subject will be notified of the purposes of the processing, with reference to this information note for more information, and of any recording of the phone call. The release of explicit consent to recording will take place through the willingness expressed by the data subject to continue the call. In the event that the data subject does not want to give his/her consent, it will be sufficient to hang up.

3. Fulfilment of legal and regulatory, accounting, tax, social security contributions obligations or of any other nature related to the provision of services by the CC.

Legal basis: fulfilment of legal obligations to which the Data Controller is subject (art. 6, par. 1, lett. (c), of the GDPR): *"the processing is necessary for compliance with a legal obligation to which the data controller is subject"*. The processing of Data is necessary and in the event of failure to provide such data, it will not be possible for the Company to comply with legal obligations.

4. Management of litigation in the event of non-compliance, disputes, legal disputes and/or settlements, as well as, in general, for the protection of the rights and legitimate interests of the Data Controller and/or third parties, including in court.

Legal basis: legitimate interest of the Data Controller to protect, exercise interests and rights, including that of defence, in any competent forum (art. 6, par. 1, lett. (f), of the GDPR): *"the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data"*. The provision of your Data is optional, however, if you do not provide them, the Company may not be able to provide the services requested through the CC.

5. Carrying out direct marketing activities through outbound calls made by the CC relating to the Company's products, services, events and commercial initiatives,

Legal basis: your explicit consent, as a data subject (art. 6, par. 1, lett. (a), of the GDPR): *"the data subject has expressed consent to the processing of his or her personal data"*. Consent can be revoked at any time, interrupting the performance of these activities, without, however, the revocation affecting the lawfulness of the processing operations carried out up to that moment.

4. Data retention period

Your Data will be processed for the entire duration of the contractual relationship with the Company, after which they will be stored for a period of 10 years from the end of the contractual relationship, in compliance with the ordinary limitation periods identified by the Civil Code or by

specific legal provisions, for administrative purposes and/or to assert or defend a right, or legitimate interest, and the same will be deleted when the purposes for which they were collected cease to exist. Any telephone recordings will be kept for a period of 60 days. In addition, if you have given consent to the processing of your Data for direct marketing purposes, your Data will be processed for 24 months from the date on which the consent was given, unless you revoke your consent. This period may be extended if you renew your consent to the processing for this purpose.

5. Data processing methods

The processing of the Data will take place using IT and/or telematic tools, suitable for guaranteeing their security and confidentiality and will be carried out by personnel duly trained in compliance with the legislation on the protection of personal data, as well as formally appointed to process the Data. There are no automated decision-making processes.

6. Recipients of the Data

Your Data may be communicated, for the purposes indicated above, to employees of the Data Controller, who have been duly authorised and instructed to process the data, as well as to the following categories of subjects, who may act as duly designated data processors or data controllers:

- (i) other companies belonging to the Safilo Group that carry out production, logistics and commercial activities;
- (ii) persons, companies, associations or professional firms that provide services and activities of assistance and consultancy to the Company (such as, for example, data processing companies, documentation archiving firms, logistics service providers, professional consultants);
- (iii) Banks;
- (iv) subjects who have the right to access the Data by law and secondary legislation or by provisions issued by the competent authorities.

7. Transfer of data abroad

Your Data may be transferred to entities established outside the European Economic Area ("EEA"), in countries where Safilo Group companies are present, for the purposes set out above. Your Data will be transferred on the basis of adequacy decisions of the European Commission, pursuant to Article 45 of the GDPR. Only for those countries in which such adequacy decisions are not present, your Data will be transferred on the basis of the derogation referred to in Article 49 par. 1, lett. (b), of the GDPR, i.e. for the performance of a contract concluded between the data subject and the data controller or for the execution of pre-contractual measures adopted at the request of the data subject. The list of third countries to which your Data may be transferred is available at <https://www.safilogroup.com/en/customers/customer-care>.

8. Your rights

You may exercise, in the cases expressly provided for by law, the rights referred to in Articles 15 - 22 of the GDPR. In particular, you have the right to:

- request confirmation that your Data is being processed and, if so, ask the Data Controller for access to information relating to the processing itself;

- request the correction of inaccurate or incomplete Data;
- ask the Data Controller to delete the data;
- request the limitation of processing;
- request to receive the Data concerning you in a commonly used and machine-readable format and to transmit them to another controller, or to obtain direct transmission from one controller to another, if technically feasible (so-called data portability);
- revoke any consent given at any time. In any case, the revocation does not affect the lawfulness of the processing carried out up to that moment;
- object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you and processed on the basis of the legitimate interest of the Data Controller or third parties.

The Data Controller must do so without delay and, in any case, no later than one month after receipt of the request. The deadline may be extended by two months, if necessary, taking into account the complexity and number of requests received by the Data Controller. In such cases, the Data Controller will inform you and illustrate the reasons for the extension within one month of receipt of your request.

You may exercise these rights by sending a request by e-mail to the Data Controller at the following e-mail address, dataprotection@safilo.com.

Finally, if you believe that the processing of your Data violates the legislation on the protection of personal data, you have the right to lodge a complaint with the Data Protection Authority.

9. Changes

This information note was updated on 7 May 2025 and may be subject to subsequent amendments, also related to the possible entry into force of new sector regulations, the updating or provision of new services by the Data Controller or technological innovations that have taken place.

The latest version of this policy is always available at <https://www.safilogroup.com/en/customers/customer-care>.