

PRIVACY NOTICE – CUSTOMERS

In accordance with Artt.13 and 14 of the Regulation (EU) 2016/679 (“GDPR”) the following information is provided regarding the processing of personal data.

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

Safilo S.p.A., with its registered office in Padua, at Via Settima Strada No. 15, 35129 (hereinafter, the “Company” or “Data Controller”), acts as the Data Controller in relation to the processing of personal data carried out in the context of managing customer relations.

The Data Controller has appointed a Data Protection Officer (“DPO”), who can be contacted at the following email address: dpo@safilo.com.

2. Categories of Data Processed

The information that the Company may process, within the limits of the purposes and methods described in this policy, may be classified as “General personal data”, which includes personal details, identification data, contact details, bank and billing details relating to you or to legal representatives, authorised agents, employees and staff responsible for managing the contractual relationship, as well as the name, bank and billing details relating to partnerships and/or sole traders.

3. Purposes of processing and legal bases

The Company may process your data for the following purposes:

1. Establishing, managing and organising activities relating to pre-contractual and contractual relationships with customers, as well as managing administrative, accounting and tax obligations, and the termination of the contractual relationship.

Legal basis: performance and proper management of the contract entered into between you and the Company, Article 6(b) of the GDPR: *“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”*. The processing of your Data is necessary and, should you fail to provide it, it will not be possible to enter into any contractual relationship with the Company.

Data retention period: Your Data will be processed for the entire duration of the contractual relationship with the Company, after which it will be retained for a period of 10 years from the end of the contractual relationship, in accordance with the ordinary limitation periods set out in specific national legislation, for administrative purposes and/or to assert or defend a right or a legitimate interest, and it will be erased once the purposes for which it was collected no longer apply.

2. Assessment of customers’ creditworthiness and commercial and financial reliability to prevent fraud, ensure sound management and the proper execution of commercial and contractual relationships.

Legal basis: the legitimate interest of the *Data Controller* and/or third parties, which, based on the assessments carried out by the Company, does not infringe upon your rights, Article 6(f) of the GDPR: *“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data”*. The provision of data is necessary. Failure to provide data will prevent the Data Controller from pursuing the legitimate interest set out in the purposes of this section. Any refusal must be weighed against the Data Controller’s legitimate interest set out in the purposes of this section.

Data retention period: Your data will be processed for a maximum of three years, unless you object.

3. Compliance with legal and regulatory obligations, including accounting, tax, social security and any other obligations related to the above, including in accordance with national and European Union legislation to which the Data Controller is subject.

Legal basis: compliance with legal obligations, Article 6(c) of the GDPR: *“processing is necessary for compliance with a legal obligation to which the controller is subject”*. The processing of your data is necessary and, should you fail to provide it, the Company will be unable to comply with its legal obligations.

Data retention period: Your Data will be processed for ten years, unless otherwise provided for by law.

4. Management of disputes in the event of non-compliance, claims, legal proceedings and/or settlements, as well as, in general, for the protection of the legitimate rights and interests of the Data Controller and/or third parties, including in court proceedings, and also in relation to the relevant Branches.

Legal basis: the legitimate interest of the *Data Controller* and/or third parties, which, based on the assessments carried out by the Company, does not infringe your rights, Article 6(f) of the GDPR: *“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data”*. The provision of data is necessary. Failure to provide data will prevent the Data Controller from pursuing the legitimate interest set out in the purposes of this section. Any refusal must be weighed against the Data Controller’s legitimate interest set out in the purposes of this section.

Data retention period: Your data will be processed for ten years, unless you object and subject to the time required for legal defence.

5. Management control aimed at guiding management towards the achievement of the objectives set during operational planning, by identifying, through the measurement of specific indicators, the deviation between planned objectives and actual results, and by informing the responsible bodies of such deviations so that they may decide on and implement the appropriate corrective actions.

Legal basis: the legitimate interest of the *Data Controller* and/or third parties, which, based on the assessments carried out by the Company, does not infringe your rights; Article 6(f) of the GDPR: *“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data”*.

The provision of data is necessary. Failure to provide data will prevent the Data Controller from pursuing the legitimate interest set out in the purposes of this section. Any refusal must be weighed against the Data Controller's legitimate interest set out in the purposes of this section.

Data retention period: Your data will be processed for ten years, unless you object.

6. Service satisfaction survey via email (no marketing).

Legal basis: legitimate interest of the *Data* Controller and/or third parties, which, based on the assessments carried out by the Company, does not infringe your rights, Article 6(f) of the GDPR: *"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data"*. The provision of data is necessary to enable the Data Controller to conduct the survey (no marketing). Failure to provide the data will prevent the Data Controller from achieving the legitimate interest set out in the purposes of this section.

Retention period: the information you provide for the purposes of the survey will be anonymised and, in any event, your data will be retained for 3 months from the date of collection, unless you object.

7. Handling of requests relating to the protection of personal data and requests from other data subjects, in accordance with Articles 15 et seq. of the GDPR (rights of the data subject).

Legal basis: compliance with legal obligations, Article 6(c) of the GDPR: *"processing is necessary for compliance with a legal obligation to which the controller is subject"*. The processing of your data is necessary and, should you fail to provide it, the Company will be unable to comply with its legal obligations.

Data retention period: Your Data will be processed for five years from the closure of the request, unless there are any disputes.

4. Methods of data processing

Data processing will be carried out using IT and/or telecommunications tools designed to ensure security and confidentiality, and will be performed by staff who have been duly trained in compliance with data protection legislation and who have been formally appointed to process the Data. Please note that no fully automated decision-making processes are carried out.

5. Recipients of the Data

Your personal data will be disclosed to parties who will process the data in their capacity as independent data controllers or data processors (Article 28 of the GDPR) and processed by natural persons (Article 29 of the GDPR) acting under the authority of the data controller and data processors on the basis of specific instructions provided regarding the purposes and methods of processing. The data will be disclosed to recipients falling into the following categories: (i) other companies belonging to the Safilo Group that are involved in the production, logistics and commercial processes; (ii) individuals, companies, associations or professional firms providing services and assistance in the areas of tax consultancy and administrative/accounting management to the Company (such as, for example, data processing companies, document archiving firms, logistics service providers and professional consultants); (iii) banks; (iv) entities that manage, support or assist the Data Controller, even on an occasional basis, in the administration of the Information System and telecommunications networks (including email,

websites and/or web platforms); (v) commercial credit agencies for the assessment of creditworthiness and payment habits and/or entities for debt recovery purposes; (vi) bodies designated by current accounting and tax legislation as recipients of mandatory communications; (vii) competent authorities for the fulfilment of legal obligations and/or provisions issued by public bodies, upon request.

6. Transfer of data abroad

Where the personal data being processed is processed within the European Economic Area (EEA), it circulates freely in accordance with Regulation (EU) 2016/679 (GDPR).

Where data is transferred to third countries outside the EEA (for example, for the purposes of using suppliers or group companies established there), the Data Controller guarantees that this takes place in accordance with Chapter V of the GDPR, on the basis of an adequacy decision by the European Commission (Article 45) or, failing that, the Standard Contractual Clauses (SCCs) (Article 46), supplemented where necessary by appropriate additional safeguards.

The data subject may request a copy of the adequacy decisions and intra-group safeguards at the following email address: dataprotection@safilo.com

7. Your rights

Data subjects may exercise their rights as set out in Articles 15 et seq. of the GDPR by contacting the Data Controller at the following email address: dataprotection@safilo.com.

The Data Controller guarantees data subjects the right to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure (Article 17) and restriction of processing (Article 18). The Data Controller shall notify (Article 19) each recipient to whom personal data have been disclosed of any rectification, erasure or restriction of processing carried out. The Data Controller shall inform data subjects who so request of the identities of such recipients.

The data controller guarantees the right to data portability (Article 20) and, in the event of requests pursuant to Article 20, will provide data subjects with their data in a structured, commonly used and machine-readable format.

Data subjects have the right to object (Article 21), at any time, to the processing of data based on legitimate interest, by writing to the contact details provided above with the subject line 'objection'.

Should data subjects consider that the processing of personal data carried out by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, they are free to lodge a complaint with [the national](#) supervisory [authority](#), in particular in the Member State where they habitually reside or work, or in the place where the alleged infringement of the Regulation occurred, or to bring the matter before the appropriate courts.

8. Amendments

This privacy notice was updated on 22 June 2026 and may be subject to further amendments, including those relating to the entry into force of new sector-specific regulations, the updating or provision of new services by the Data Controller, or technological innovations.