

PRIVACY POLICY

Welcome to Carl Zeiss India (Bangalore) Private Limited (“**CZ India**”) privacy policy (“**Privacy Policy**” or “**Policy**”). CZ India shall be responsible for the protection of all personal data that may be transmitted and stored on the Digital Platform (as defined below).

This Policy outlines **CZ India’s** and its affiliates’ (“**we**”, “**us**”, or “**our**”) practices in relation to the storage, use, processing, and disclosure of personal data that You have chosen to share with us or that we collect about You (including, for example, when You contact us through the information available on our Lead Generation Platform [•] (“**Digital Platform**”). This Policy explains how we process and use Your personal data.

At CZ India, we are committed to protecting any personal information that we may receive while You access our Digital Platform. We believe it is important for You to know how we treat information about You that we receive when You engage with us. This Privacy Policy is devised to help You feel more confident about the privacy and security of Your personal details. “You” shall mean You, the User of the Digital Platform and “Yourself” interpreted accordingly. “Users” means the Users of the Digital Platform collectively and/or individually as the context allows.

By interacting with us, submitting information to us, or using the Digital Platform, You confirm that You have read this Policy and consent to the collection, use, disclosure, and/or retention of Your personal information in accordance with the processing activities described under this Policy.

1. CONSENT

1.1 User Consent

This Policy applies to all individuals who access or use the Digital Platform. By providing Your unambiguous and clear acceptance, on the Digital Platform when You register for an account, communicate with us, on our Digital Platform or input any of Your data on the Digital Platform, You agree and provide consent to the collection, storage, usage, and disclosure of Your personal data, as described in and collected by us in accordance with this Policy.

1.2 Third-Party Services

The Digital Platform may include links to third-party websites, plug-ins, and applications such as payment plug-ins, delivery providers, virtual try-on, etc. Clicking on those links or enabling those connections may allow third parties to collect or share

data about You. We encourage You to read the privacy policy of such third-party service providers.

1.3. Data sharing with ECPs

We may share Your data with the specific Eye Care Professional (“ECP”) that You choose through the Digital Platform for fulfillment of services affiliated with the Digital Platform. We ensure that any sharing of personal information with the ECPs is governed by contractual agreements that necessitate the ECPs to adhere to applicable data protection laws and to use Your information solely for the purposes specified by us.

2. PERSONAL DATA COLLECTED

2.1 We collect different types of personal data about You in various ways, which we have grouped together as follows. The information that we collect may include:

- i. **Identity Data**, such as Your name, email address and any similar identifier.
- ii. **Contact Data**, such as Your address, email addresses, and telephone Number/s.
- iii. **Technical Data**, which includes Your IP address, device ID, device type or other identifier, browser information including browser type and version, browser language preference, time zone setting and location, browser plug-in types and versions, web browser application details, corresponding location details, date and time stamp, operating system, and other technology on the devices You use to access the Digital Platform.
- iv. **Usage Data**, which includes information about how You use the Digital Platform and Your activity within the sites, time spent using the Digital Platform, referring URL, and page views.
- v. **Health Data**, which includes eye prescription values .
- vi. **Order Data**, which includes the items selected as well as shipment details
- vii. **Marketing and Communications Data**, which includes Your preferences

in receiving marketing from us and our third parties and Your communication preferences and any other data that may form a part of communication between You and our agents, employees, consultants, contractors or representatives of ours.

2.2 We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from Your personal data but is not considered personal data under law as it does not directly or indirectly reveal Your identity. 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 Policy.

2.3 What happens if You refuse to provide Personal Data?

Where we need to collect personal data by law, or under the terms of a contract we have with You, and You fail to provide that data when requested, we may not be able to perform the order we have or are trying to enter into with you. In this case, we may not be able to provide You access to our Digital Platform.

3. COLLECTION OF PERSONAL DATA

3.1 We use different methods to collect Your data, including through:

- a. **Direct Interactions.** You provide us Your personal data when You interact with us. This includes personal data You provide when You request marketing information to be sent to You, create or log in with your ZEISS ID account, subscribe to our newsletters, interact with the Digital Platform chat assistant, or when You give us feedback or contact us.
- b. **Automated technologies or interactions.** As You interact with the Digital Platform, 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 Digital Platforms that employ our cookies.
- c. **Third parties or publicly available sources.** We will receive personal data about You from various third parties once you have consented to

sharing your data for marketing purposes via their consent notice and accepted their Privacy Policy.

4. USAGE OF PERSONAL DATA

- 4.1 We will only use Your personal data when the law allows us to. Most commonly, we will use Your personal data where we need to provide You access to the Digital Platform. We use Your personal data for the following purposes:
- a. User registration, administration and access control
 - b. To collect Your order details to be shared with the seller of the products/ECPs
 - c. To fulfill Your order including production of lenses and shipment and to provide related services
 - d. **To personalize Your experience.** Your information helps us to better respond to Your individual needs.
 - e. **To improve our services.** We continually strive to improve our service offerings based on the information and feedback we receive from You.
 - f. **To send periodic emails, including marketing emails.** The email address and phone number You provide may be used to send You marketing emails (Subject to Your explicit consent), information, and updates, in addition to receiving occasional company news and updates related to us or our business.
 - g. **To comply with legal obligations.** In order to enable us to comply with any requirements imposed on us by the law and for the law.

5. Your rights as a data subject

Of course, You retain control over all personal data that You provide to us when using our services. You have the following rights, which You can exercise free of charge. If You have any questions regarding data protection or questions relating to the processing of Your personal data or the exercise of Your rights, please contact us by either using our [contact form](#), [Principal Rights Page](#) or email address:

Indian Data Protection Officer

E-mail: dpo.in@zeiss.com (Please do not send confidential content by e-mail)

To claim any of the following rights against our company, please contact the Grievance Officer provided below at Clause 5.5.

- 5.1 **Right of access:** You have the right to obtain information about Your personal data stored by us at any time. You have the right to know for what purposes Your personal data is processed, how long it is processed (see [Storage duration](#)) and to whom it is disclosed, if applicable (see [Data categories](#)). Please understand that we must first verify the identity of the requesting person before we can provide information.
- 5.2 **Right of revocation/objection:** If You have given us consent for a certain processing of Your data, You have the right to revoke this consent at any time with effect to the future through our Principal Rights Page. If we process Your personal data within the framework of a balancing of interests due to our overriding legitimate interest, You have the right to object to this processing at any time with effect for the future.
- 5.3 **Right to data portability:** You have the right to request a transfer of Your personal data from us to another entity.
- 5.4 **Right to rectification, erasure or restriction of processing:** You have the right to have Your data rectified and/or supplemented by means of an additional declaration, You also have the right to have Your data deleted for the purposes for which they were collected or to limit the processing of Your data thereof. This can be done through our Principal Rights Page.
- 5.5 **Right of complaint:** You have the right to complain to a supervisory authority or our Grievance Officer (please see Clause 14 below), insofar as You should have a reason to complain.

6. COOKIES

- 6.1 You should be aware that information and data may be automatically collected through the Use of Cookies. "Cookies" are text files placed to Your computer browser that store basic information that a website can use to recognize repeat site visits and as an example, recall Your name if this has been previously supplied.
- 6.2 We use cookies to help us understand and save Your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contact third-party service providers to assist us in better understanding our site visitors. These service providers are not

permitted to use the information collected on our behalf except to help us conduct and improve our business.

- 6.3 Additionally, You may encounter cookies or other similar devices on certain pages of the Digital Platform that are placed by third parties. We do not control the use of cookies by third parties. If You send us personal correspondence, such as emails, or letters, or if other users or third parties send us correspondence, such as emails, or letters, or if other users or third parties send us correspondence about Your activities or postings on the Digital Platform, we may collect such information.

7. DISCLOSURES OF PERSONAL DATA

- 7.1 You agree and acknowledge that any and all information pertaining to You, whether or not directly provided by You to us (via the Digital Platform or otherwise), including but not limited to personal correspondence such as emails, instructions from You, etc., may be collected, compiled, and shared by us in order to render the Digital Platform to You. This may include but not be limited to third-party service providers, storage providers, data analytics providers, consultants, lawyers, and auditors.
- 7.2 You expressly consent to the sharing of Your information with third party service providers for fulfilment of services related to this Digital Platform. Such sharing of Your data/information shall be processed and treated as per that policy here.
- 7.3 You agree and acknowledge that we may share data where we are required by law, any court, a government agency, or authority or for any other purpose as prescribed under relevant laws, to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or in order to comply with any applicable laws and regulations.

8. TRANSFER OF PERSONAL DATA

- 8.1 We comply with applicable laws in respect of storage and transfers of personal data. As a part of Your use of the Digital Platform, the information, and personal data You provide to us may be transferred to and stored in countries (including but not limited to Germany) other than the country You are based in. This may happen if any of our servers are from time to time located in a country other than the one You are based in,

or one of our service providers is located in a country other than the one You are based in.

- 8.2 By submitting Your information and personal data to us, You agree to the transfer, storage, and processing of such information and personal data in the manner described above.

9. DATA SECURITY

- 9.1 We have implemented appropriate security measures to prevent Your personal data from being accidentally lost, used, or accessed without authorization, altered, or disclosed, and are fully compliant with the standards laid down under applicable laws.

10. DATA RETENTION AND DURATION OF STORAGE

- 10.1 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, 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 legal obligation to retain such data in respect of our relationship with You.

11. BUSINESS TRANSITIONS

- 11.1 In the event we go through a business transition, including but not limited to a merger, acquisition by another organization or sale of all or portion of our assets, Your personal data might be among the assets transferred.

12. USER GENERATED INFORMATION

- 12.1 We invite Digital Platform users to submit feedback and suggestions, make service requests, and submit details of grievances on the Digital Platform. Please note that such content may be available to visitors to our Digital Platform.
- 12.2 We cannot prevent such information from being used in a manner that is contrary to this Policy, applicable laws, or Your personal privacy, and we disclaim all liability (express or implied) in this regard. Further, You agree to comply with all applicable laws in relation to the content uploaded or otherwise shared and received by You on our Digital Platform. You understand and acknowledge that You will be solely

responsible for any information published or shared by You on or through our Digital Platform that violated applicable laws.

13. UPDATES TO THIS POLICY

13.1 We may occasionally update this, Policy. If we make changes to this Policy, we will notify You of the changes through the Digital Platform or through other means, such as email. To the extent and subject to the extent permitted under applicable law, by using our Digital Platform after such notice, You consent to updates made to this Policy.

13.2 We encourage You to periodically review this Policy for the latest information on our privacy practices.

14. GREVIANCE OFFICER

14.1 If You have any questions about this Policy, how we process or handle Your personal data, or otherwise, You may reach out to us, with Your queries, grievances, feedback, and comments at dataprivacy@zeiss.com (Please do not send confidential content by email) or contact our grievance officer whose contact details are provided below:

Grievance Officer

Name: Mahalakshmi PG

Designation: Data Protection Officer

Email: dpo.in@zeiss.com