

Marcolin USA Privacy Policy

Last Updated: November 14th, 2024

This Privacy Policy describes how Marcolin U.S.A. Eyewear Corp (“Marcolin”) handles the personal information of individuals to whom we market and provide our services, of individuals who provide us their services, as well as the information we collect on our website, from third parties, and from other sources.

We treat all personal information covered by this Privacy Policy, including information about any visitors to our website, as pertaining to individuals acting as business representatives, and not in their individual or household capacity.

Personal Information We Collect

Information you provide to us:

- **Business contact details**, such as your first and last name, business email address, business mailing address, and I-9 information such as driver’s license, social security number, and passport number.
- **Payment and transaction data** needed to complete your orders on or through the services (including name, payment card information, bank account number, billing information), and your purchase history. This information is processed directly by our third party payment service provider.
- **Communications** that we exchange with you, including when you contact us with questions, feedback, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications, and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Third parties**, such as data providers, event co-sponsors, and others.
- **Public sources**, such as social media platforms.

Automatic data collection. We, and our service providers, may automatically log information about you, your computer or mobile device, and your interaction over time with our website and services (in your capacity as our customer’s authorized user), our communications and other online services, such as:

- **Device data**, such as your computer’s or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.

- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the website, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.
- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

How We Use Personal Information

Service delivery. We use your personal information to:

- Provide, operate and improve our services and our business;
- Communicate with you about the services, including by sending announcements, updates, security alerts, and support and administrative messages; and
- Provide support for our services, and respond to your requests, questions and feedback.

Research and development. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve our services, and promote our business.

Direct marketing. We may send you direct marketing communications as permitted by law, including, but not limited to, notifying you of special promotions, offers and events via postal mail, email, telephone, text message, and other means. You may opt out of our marketing communications as described in the "Opt out of marketing communications" section below.

Compliance and protection. We may use your personal information to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- Audit our internal processes for compliance with legal and contractual requirements and internal policies;
- Enforce the terms and conditions that govern our website and services; and

- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How We Share Personal Information

We do not sell your personal information. We may share your personal information with:

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. Companies and individuals that provide services on our behalf or help us operate our services or our business (such as hosting, information technology, customer support, email delivery, payment processing and website analytics services).

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Marcolin or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your Choices

Personal information requests. Depending on your location and the nature of your interactions with us, you may request the following in relation to personal information:

- **Information** about how we have collected and used personal information. We have made this information available to you without having to request it by including it in this Privacy Policy.
- **Access** to a copy of the personal information that we have collected about you. Where applicable, we will provide the information in a portable, machine-readable, readily usable format.
- **Correction** of personal information that is inaccurate or out of date.
- **Deletion** of personal information that we no longer need to provide the Services or for other lawful purposes.
- **Appeal** our denial of your personal information request by contacting us as set out in the “How to Contact Us” section below.

To make a request, please email us or write to us as provided in the “How to Contact Us” section below. We may ask for specific information from you to help us confirm your identity. You are entitled to exercise the rights described above free from discrimination.

Limits on your privacy rights and choices. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in the “How to Contact Us” section below.

Opt out of marketing communications. You may opt out of marketing-related communications by following the opt out or unsubscribe instructions contained in the marketing communications we send you.

Online tracking opt-out. There are a number of ways to limit online tracking, which we have summarized below:

- **Blocking cookies in your browser.** Most browsers let you remove or reject third party cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.
- **Using privacy plug-ins or browsers.** You can block our websites from setting cookies by using a browser with privacy features, like Brave, or installing browser plugins like Privacy Badger, Ghostery, or uBlock Origin, and configuring them to block third party cookies/trackers. You can also opt out of Google Analytics by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout>.

Note that because these opt out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Other Sites and Services

Our services may contain links to websites and other online services operated by third parties. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be integrated into web pages or other online services that are not associated with us. We do not control websites or online services operated by third parties, and we are not responsible for their actions.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

Children

Our services are not intended for use by children under 13 years of age. If we learn that we have collected personal information through our services from a child under 13 without the consent of the child's parent or guardian as required by law, we will delete it.

Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

How to Contact Us

You can reach us by email at infousa@marcolin.com.