

# Privacy policy

The General Data Protection Regulation (“**GDPR**”) and the UK version of the GDPR (“**UK GDPR**”) establish specific obligations in relation to personal data, particularly for retail businesses operating in the European Union and the United Kingdom. IZIPIZI is therefore subject to these regulations and is committed to protecting your personal data. This privacy policy (the “**Policy**”) is designed to provide you with all information necessary for understanding how we use your personal data.

**IZIPIZI may amend this Policy at any time. We therefore recommend you regularly check back on it. In the event of substantial changes being made to the Policy in relation to your rights, IZIPIZI will draw your attention to these as soon as reasonably possible.**

## 1. WHO PROCESSES YOUR PERSONAL DATA?

The company, IZIPIZI, is a “SAS” (simplified joint-stock company) with capital stock amounting to €50,000.00 registered with the Commercial and Company Register in Paris under SIREN number 524 478 138 and with TVA number FR45524478138, with head office at 19 Rue de Calais, 75009 Paris (referred to in this Policy as “**IZIPIZI**”, “**we**”, “**our**”, or “**us**”). We sell glasses and related accessories that you can buy online at the website at <https://www.izipizi.com> (the “**Website**”) and in our stores.

IZIPIZI may, as the data controller, process personal data relating to visitors to the Website, as well as customers and prospective customers for our products. Personal data means any information about an individual from which that person can be identified (“**personal data**”). It does not include data where the identity of the individual has been removed (anonymous data).

## 2. WHAT PERSONAL DATA DO WE PROCESS?

IZIPIZI may collect, use, store and transfer the following types of personal data from you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth, phone number, mail and postal address.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions,

operating system and platform, and other technology on the devices you use to access the Website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Website and view our products.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any 'special categories of personal data' about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

The Website is not intended for children, and we do not knowingly collect or process data relating to children.

### ***If you fail 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 contract we have or are trying to enter into with you (for example, to deliver our products to you). In this case, we may have to cancel a contract you have with us but we will notify you if this is the case at the time.

## **3. HOW DO WE COLLECT YOUR PERSONAL DATA?**

We may collect the types of personal data set out in paragraph 2 above in the following ways:

3.1 directly from you:

3.1.1 when a customer account is created;

3.1.2 when signing up for our newsletter;

3.1.3 when you use our contact form or otherwise contact us;

3.1.4 when you give us your contact details in-store; and

3.1.5 when you use the Website.

3.2 indirectly:

- 3.2.1 through social networks such as Facebook, Instagram, Tiktok, LinkedIn, YouTube and X (formerly Twitter): personal data is liable to be exchanged between IZIPIZI and social networks when, for example, you visit the Website and are simultaneously logged into these social networks on your device. These exchanges can be prevented by logging out of social media before visiting the Website; and
- 3.2.2 through cookies and trackers. To find out more, please contact us at [contact@izipizi.com](mailto:contact@izipizi.com).

Your personal data may also be collected on our behalf and provided to us when you purchase our products in any of our stores. For example, when you purchase any of our products in our UK stores you are contracting with our UK subsidiary, IZIPIZI UK Ltd. That company may collect your personal data on our behalf as part of the purchase transaction or for subsequent marketing purposes.

#### **4. WHY DO WE PROCESS YOUR DATA?**

IZIPIZI uses the personal data we collect about you:

- 4.1 when this is necessary to fulfil our contract with you or for the execution of pre-contractual measures taken at your request, for example when:
  - 4.1.1 creating your customer account;
  - 4.1.2 managing your orders, for their tracking and invoicing;
  - 4.1.3 sending product availability notifications;
  - 4.1.4 managing communications and exchanges, notably in the event of disputes;
  - 4.1.5 managing electronic newsletters, SMS and commercial offers;
  - 4.1.6 monitoring your satisfaction;
  - 4.1.7 managing any requests to exercise your rights applicable within the framework of the GDPR or UK GDPR;
- 4.2 when this is necessary to enable us to fulfil our legal and regulatory obligations, for example when:
  - 4.2.1 managing the risks related to fraudulent use of your personal data. IZIPIZI takes every precaution we deem useful and/or necessary to ensure the security of your personal data and our information systems, and to defend our interests. These measures may, where necessary, lead to suspension

- of your online account if we reasonably suspect that it is being used for fraudulent purposes; and
- 4.2.2 fulfilling our legal obligations or complying with applicable legislation, such as requests from the tax or data protection authorities;
- 4.3 when we have a legitimate interest, to promote and improve our retail services, for operations related to sales prospecting or for the completion of studies, with respect for your rights and where your interests and fundamental rights do not override those interests, for example:
- 4.3.1 managing the risks related to fraudulent use of your personal data. IZIPIZI takes every precaution we deem useful and/or necessary to ensure the security of your personal data and our information systems, and to defend our interests. These measures may, where necessary, lead to suspension of your online account if we reasonably suspect that it is being used for fraudulent purposes;
  - 4.3.2 managing any disputes, notably linked to the recovery of any sums owed to us and when managing payment incidents;
  - 4.3.3 when you visit the Website, we record your visits in order to show advertising for our products when you browse other websites. Neither the advertising agencies nor the third party sites displaying our advertising have access to your personal data. If you no longer wish to see our advertising, you can delete the cookies from your web browser: <https://www.comment-supprimer.com/les-cookies/>; and
  - 4.3.4 to improve our retail services and the relevance of our offers, we use software and services operated by third-party providers that enable us to better understand our business. To this end, we provide these programs with access to personal data in our customer database, your browsing history on the Website, and information on the products you have ordered from us; and
- 4.4 when you have given your permission. In this case, you can retract your permission at any time, without this having any retroactive effect. This is notably the case for our weekly newsletter, which you can unsubscribe from at any time by clicking on the link “me désabonner” (unsubscribe) at the bottom of the newsletter or directly from the Website in your customer account in the section “mon compte/vos données personnelles” (my account/your personal data). This will have immediate effect.

### ***Change of purpose***

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the contact details referred to in paragraph 10 below.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### ***Marketing***

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You may receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

## **5. WHO HAS ACCESS TO YOUR DATA?**

Your personal data is accessible to authorised IZIPIZI staff.

Your order information is sent to the various service providers involved in ensuring your order reaches you, including our subsidiary company IZIPIZI UK Limited, and our logistician who prepares the package and the shipping company who delivers it to your address, all acting as data processors. They are not permitted to use your personal data for any purpose other than the processing of your order and must delete your personal data from their information systems once the order has been processed. These service providers store your personal data in data centers in Europe.

Your personal data will be stored by our cloud data storage provider, Adobe, acting as a data processor. Your data will be stored by Adobe on servers within the EU.

We also use a French service provider, acting as a data processor, for our newsletters which is ISO-27001 certified.

Our service provider Diduenjoy, acting as a data processor, receives your email address, full name, and order reference number for the sole purpose of sending you a satisfaction survey

to assess your purchasing experience on the Website. Diduenjoy is a simplified joint-stock company with a capital of €1,000, registered at the Paris Trade and Companies Registry under the number B 801 901 273, headquartered 8, rue Cadet à Paris (75009), France.

Our service provider Antadis, acting as a data processor, has access to your personal data as part of its tasks to develop and maintain the Website. Antadis is a simplified joint-stock company registered under SIRET: 443 924 527 and headquartered at 1 Rue de Clairefontaine 78120 Rambouillet, France.

## **6. HOW LONG IS YOUR DATA STORED?**

Your personal data is stored for as long as reasonably required for the purposes outlined above, plus for the purposes of satisfying any legal, regulatory, tax, accounting 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 prospect of litigation in respect of our relationship with you.

The personal data that you provided on registration for an account with us (plus details of your orders with us) will be stored for the duration of the period for which you retain your account with us. Your personal data may then be stored for three years following your last contact with us, notably to enable us to send you commercial offers and newsletters.

## **7. WHAT SECURITY MEASURES ARE IN PLACE TO PROTECT YOUR PERSONAL DATA?**

In accordance with the GDPR, UK GDPR and other applicable data protection legislation, IZIPIZI has put in place appropriate technical, physical, and organisational measures which are designed to ensure the security and confidentiality of your personal data and to prevent your personal data from being distorted, damaged, or accessed by unauthorised third parties.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Additionally, IZIPIZI chooses its sub-contractors and service providers carefully, and they must provide guarantees in terms of quality, security, reliability, and resources that enable implementation of these security measures.

## **8. DOES YOUR PERSONAL DATA LEAVE THE EUROPEAN UNION?**

The servers for the Website are hosted exclusively by OVH Groupe SAS, in France, in data centers in the north of France. These servers contain our databases required for operating the Website and information on customer accounts. OVH is registered in the commercial court of Lille Metropole under SIREN: 537 407 926, headquartered at 2 rue Kellermann, 59100 Roubaix, France.

Some of our statistics tools operate in the United States. All personal data handled for statistics purposes outside of Europe are fully anonymised prior to being made available in the United States.

If you opt for delivery outside Europe, your data and postal address will need to be sent to the logistics department of the shipping company, acting as a data processor, that will deliver your order in that country. Whenever we transfer your personal data outside of the European Economic Area (EEA), we ensure that a similar degree of protection is afforded to it by: only transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or using specific contractual clauses approved for use in the EEA or the UK.

## 9. WHAT RIGHTS DO YOU HAVE OVER YOUR DATA?

Under certain circumstances, you have rights under the relevant data protection regulations, in relation to your personal data. Please see below to find out more about these rights.

Note that you can amend most of your personal data yourself in your customer space in your account on the Website.

If you wish to exercise any of the rights set out below, please contact us using the details set out in this policy.

You have the following rights:

**Request access to your personal data (commonly known as a "data subject access request").** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data

for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request Restriction of processing.** You can ask to exercise your right to restrict the processing of your personal data, in the following scenarios

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

**Withdraw consent where we are relying on consent to process your personal data .** You can also at any time withdraw your consent when this is the legal basis for processing (the withdrawal of consent will have no consequence on the legality of the processing completed before withdrawal of consent).

**Request a transfer.** You may also request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You may exercise the rights set out in this section at any time, subject to any conditions or requirements for any of the rights detailed above. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



## **10. HOW CAN YOU CONTACT US?**

Please do not hesitate to contact us if you have any questions about your personal data or wish to exercise your rights in relation to your personal data. You can do this by emailing [contact@izipizi.com](mailto:contact@izipizi.com), providing details of your question or request.

You have the right to make a complaint at any time to your applicable regulator for data protection issues (for example, in the UK the Information Commissioner's Office (ICO), ([www.ico.org.uk](http://www.ico.org.uk))). We would, however, appreciate the chance to deal with your concerns before you approach any regulatory body, so please contact us in the first instance.

## **11. THIRD-PARTY LINKS**

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy of every website you visit.