

Personal data protection policy

1. BASIC DATA PROTECTION INFORMATION: FIRST TIER

SECTION	BASIC DATA PROTECTION INFORMATION
Data processor	"COORDINADORA INTEGRAL ÓPTICA DE SERVICIOS AGRUPADOS, S.L." (CIOSA), hereinafter the CIONE GROUP , with Tax ID no.: B82396235, with registered address at Parque Empresarial Pinar de las Rozas, calle José Echegaray 7 – 28232 Las Rozas (Madrid) + info...
Purpose (of processing)	Marketing products and services to natural and legal persons who are the owners of an optician's shop + info...
Legal basis (for processing)	We will only process the User's data (hereinafter the "User" or "Users") with the User's consent, which may be granted by checking the corresponding checkboxes on the pop-up menu that will appear when a User browses our Website (WWW.CIONE.ES) With regards to ads, we will only send you ads with your authorisation, which you can grant by checking the corresponding checkbox + info...
Recipients (of data transferred or shared)	The subsidiaries and participating entities of the CIONE GROUP , in particular, " COOPERATIVA INDUSTRIAL DE ÓPTICA SOC. COOP. CIONE " (CIONE) and " FUNDACIÓN CIONE RUTA DE LA LUZ ". No data will be transferred to third parties, except for the companies mentioned above and when required for legal obligations + info...
Rights (of data subjects)	Users have the right to know what information we store about them, and to rectify and delete it, as explained in the section on additional information + info...
Source (of the data)	With the information provided by the User when purchasing a product or using a service of the CIONE GROUP and, gathered automatically by the Website's own technology + info...
Additional information	You may check the additional and detailed Data Protection information at + info...

2. ADDITIONAL DATA PROTECTION INFORMATION: SECOND TIER

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE WEBSITE. YOU WILL LEARN ABOUT HOW WE PROCESS YOUR PERSONAL DATA. BY USING THIS WEBSITE, YOU AGREE TO THE COLLECTION AND USE OF YOUR INFORMATION, IN ACCORDANCE WITH THIS PRIVACY POLICY. WE ENCOURAGE YOU NOT TO USE THE WEBSITE IF YOU DO NOT WISH TO ACCEPT THE PRIVACY POLICY.

In compliance with the current personal data protection regulations, **CIONE GROUP** informs its Users that all personal data gathered through the forms on the Website will be saved to specific automated User files of optician's shop services.

The automated collection and processing of personal data aims to offer a differentiated service with own brands in the optician's shop sector, in addition to maintaining a commercial relationship and to other tasks, such as providing information, training and advice, as well as other sector activities.

The data will only be transferred to subsidiaries and participated entities of the **CIONE GROUP**, in particular **“COOPERATIVA INDUSTRIAL DE ÓPTICA SOC. COOP. CIONE” (CIONE)** and **“FUNDACIÓN CIONE RUTA DE LA LUZ”**, with the only aim of compliance with the purpose described above.

The **CIONE GROUP** shall adapt the measures required to guarantee the security, integrity and confidentiality of the data, in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

The User may at any time exercise the rights of access, opposition to treatment, rectification and cancellation established in said Regulation (EU). Users may exercise such rights by sending an email to **datos@cione.es** or by post, by writing to Parque Empresarial Pinar de las Rozas, calle José Echegaray 7 – 28232 Las Rozas (Madrid).

Likewise, the User states that all data provided is true and correct, and commits to ensuring that all data will be up-to-date, notifying any changes to the **CIONE GROUP**.

2.1. SECTION: "PERSONAL DATA PROCESSOR"

2.1.1. Who is the data processor responsible for processing your data?

- Identity: **“COORDINADORA INTEGRAL ÓPTICA DE SERVICIOS AGRUPADOS, S.L.” (CIOSA)**
 - Trade name: **CIONE GROUP**
 - Tax ID code: **B82396235**
 - Registered address: **Calle José Echegaray 7 – P.E. Pinar de las Rozas. 28232, Las Rozas (Madrid)**
 - Contact number: **(+34) 916 402 980**
 - Fax: **(+34) 916 402 981**
 - E-mail: **datos@cione.es**
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- For your trust and security, we inform you that we are registered with the Commercial Registry of Madrid
 - DPD contact: **datos@cione.es**

2.1.2. Based on which principles does the Data Processor work?

We will observe the following principles to process your personal data:

- **Principle of "lawfulness, fairness and transparency"**, in which personal data will be processed lawfully, fairly and in a transparent manner in relation to the data subject.

- **Principle of “purpose” which entails**, on the one hand, the mandatory processing of data for one or more specific, explicit and legitimate purposes and, on the other, prohibits any data gathered with specific, explicit and legitimate purposes to be processed subsequently in a manner that is not compatible with such purposes.
- **Principle of “data minimisation”**, i.e., application of the technical and organisational measures to guarantee that only the personal data required is used for the specific purpose of processing, reducing the extension of processing, limiting it to the corresponding storage period and also in relation to its accessibility.
- **Principle of “accuracy”**, which requires data processors to implement the reasonable measures to ensure that all data is up-to-date, deleted or modified without any undue delay when such data is incorrect with regard to the purposes for which it is processed.
- **Principle of “storage limitation”** which is one of the principles that materialises the principle of data minimisation. The preservation of data must be limited in time to achieve the purposes of processing the data. Once these purposes have been achieved, the data must be deleted, blocked or, alternatively, made anonymous, i.e., eliminating any elements that allow the data to be used to identify the data subject.
- **Principle of “security”**, which requires a risk analysis to be conducted for the data subjects to determine the technical and organisational measures required to guarantee the integrity, availability and confidentiality of all personal data processed.
- **Principle of “active responsibility” or “proven responsibility”**, which requires data processors to ensure permanent due diligence to protect and guarantee the rights and freedom of the natural persons of whom the data is processed, based on an analysis of the risks associated with processing such data to guarantee such rights and freedom, so the data processor can guarantee and be in the necessary conditions to demonstrate that the data processing tasks comply with the provisions of Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 in relation to the protection of natural persons and on the free flows of such data (hereinafter the “**GDPR**”) and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantees of Digital Rights (hereinafter the “**LOPDGD**”).

2.2. SECTION: “PURPOSE OF PROCESSING THE PERSONAL DATA”

2.2.1. What is the purpose of processing your personal data?

CIONE GROUP markets products and services to natural and legal persons who are the owners of optician's shops, with the following purposes:

1. When purchasing products and arranging services through the **CIONE GROUP**, with the purpose of maintaining the commercial relationship, and to manage, administrate, provide information, deliver and improve the service;
2. Respond to requests, enquiries, comments or concerns;
3. Provide technical, product or other types of support and help ensure the secure and protected functioning of the Website;
4. Offer personalised content or a custom design of the Website, in accordance with the User's interests and needs;
5. Assess, improve and/or develop a Website, ads and promotional campaigns for the products and services offered;
6. Send the information requested through the forms at **WWW.CIONE.ES**;
7. Report changes or updates to the Website and/or to our products and services;

8. Submit newsletters and commercial communications of promotions and/or ads of the **CIONE GROUP** and of the sector, even after the contractual relationship has ended.

Please bear in mind that Users may oppose to receiving commercial communications through any means and at any time by sending an email to **datos@cione.es**

We will prepare a "commercial profile" to offer products and services to Users according to their interests and to improve their experience. The commercial profile will be based on the information provided by the User. However, no automated decisions will be taken with this profile.

Likewise, it is worth noting that we do currently not sell, rent or transfer User data to third parties and we will not do so in the future without the User's consent. However, in the case of partnerships with third-party companies, consent will be requested from Users and they will be informed about the identity of such companies and the purposes of the partnership. The partnership will be governed by the strictest security standards.

2.2.2. For how long is the data stored?

The personal data provided will be stored throughout the commercial relationship with the User or until deletion is requested, and for the period during which legal liabilities may arise from the services provided.

2.3. SECTION: "LEGAL BASIS OF PROCESSING THE PERSONAL DATA"

2.3.1. What is the legal basis for processing your personal data?

We will process your personal data according to the following legal bases:

1. The request for information and/or the arrangement of services of the **CIONE GROUP**, the terms and conditions of which will be made available to the User before arranging a product.
2. Free, specific, informed and unequivocal consent, informing Users that they can read this privacy policy and that, after reading it, they can accept it by making a statement or a clear affirmative action, such as checking a designated checkbox.

If the User does not provide their personal data or provides incomplete or incorrect data, we may not be capable of processing their request and to provide them with the information requested or handle their request to arrange services.

2.4. SECTION: "RECIPIENTS OF TRANSFERRED OR SHARED DATA"

2.4.1. With which recipients is your data shared?

The data will be shared with the subsidiaries or participated entities of the **CIONE GROUP**, in particular, "**COOPERATIVA INDUSTRIAL DE ÓPTICA SOC. COOP. CIONE**" (**CIONE**) and "**FUNDACIÓN CIONE RUTA DE LA LUZ**" for internal administrative, financial, operational, strategic and marketing purposes, including the processing of customers' or employees' personal data.

You can read the CIONE GROUP's Legal Notice and General Terms and Conditions for Use, which have been approved by the European Data Protection Board, at:

<https://www.cione.es/wp-content/uploads/2021/12/aviso-legal-cione.pdf>

Some of the tools used by the **CIONE GROUP** to manage your data are provided by third parties. The **CIONE GROUP** shares the User's data with web management companies, developers and programmers, among others, always observing the corresponding privacy terms and conditions.

According to the scenarios in which the User includes files with personal data in shared hosting servers, the **CIONE GROUP** shall not be held liable for any violation of the GDPR by the User.

Likewise, the **CIONE GROUP** informs that, as a data hosting service provider and according to Law 34/2002, of 11 July, on the Information Society Services and E-commerce (hereinafter, the "LSSI"), it will store the information required to identify the source of hosted data and the time from which the service is provided for a maximum of 12 months. The retention of the personal data does not affect the confidentiality of communications and may only be used within the framework of a criminal investigation or for the safeguarding of public security. Therefore, this information will be made available to judges and/or courts or the relevant Ministry upon request, if needed.

The information will be disclosed to the Law enforcement forces and agencies in compliance with the personal data protection regulations.

2.5. SECTION: "RIGHTS OF DATA SUBJECTS"

2.5.1. What are the rights of data subjects who provide their data?

All data subjects have the right to obtain confirmation about whether the CIONE GROUP is processing personal data that may be of their concern or not.

Users have the right to access their personal data, and to request the rectification of inaccurate data or, if required, request their deletion when their data are not required for the purposes for which they were collected, among other reasons.

In some cases, data subjects may request the restriction of how their data is processed. In this case, the data subject's information will only be stored for the exercise or defence of claims.

Likewise, in some cases and for reasons attributable to a specific situation, Users may oppose to the processing of their data. CIONE GROUP shall stop processing the data, except for compelling legitimate reasons or for the exercise or defence of possible claims.

In compliance with the LSSI, CIONE GROUP shall not send any unsolicited advertising or promotional communications or which have not been expressly authorised by the recipients.

In the case of Users with which the CIONE GROUP has established a contractual relationship, the CIONE GROUP will be authorised to send commercial communications about products and services similar to those previously purchased or arranged by the customer.

The User may ask to stop receiving commercial information by sending a request to datos@cione.es, including a photocopy of their National ID Document, so we can identify the User properly.

For more information about your rights in relation to the protection of personal data, please visit the Spanish Data Protection Agency's website (www.agpd.es).

2.6. SECTION: "SOURCE OF THE DATA"

2.6.1. How is data collected?

The personal data processed by the **CIONE GROUP** is collected from three different sources: information obtained from that provided by the User when purchasing a product or using one of the services offered; from the information provided by the User when using different functions on the Website and automatically logged by the Website's own technology.

With regard to the data gathered and derived from some of the functions used to configure the Website, it is worth mentioning the following:

- Contact, registration or membership forms.
- Comments on blogs or interactions with **CIONE GROUP**
- Service and/or product information request form.
- Sales form.

Likewise, Users are informed that, the information collected from the Website may include:

- User's contact details, such as the name, e-mail address, postal address and telephone number;
- User names and passwords;
- Data required to make payments, such as credit or debit card numbers;
- Comments, opinions, messages and other content sent by the User via the Website;
- Communication interests and preferences.

With regard to the data gathered automatically from servers and cookies, invisible pixels and other technologies installed on the Website, the **CIONE GROUP** gathers the following information:

- The Internet protocol address used by the User to connect their computer to the Internet;
- The computer, the device and the connection data, such as, for example, the browser type and version, operating system, mobile platform, unique identification device and other technical identifiers;
- The use of the Uniform Resource Locator ("URL"), which includes the date and time, the referral and delivery URL, the search terms used, as well as the pages visited or searched on the Website; and
- The physical location of your device to provide you with the most suitable information at the place where you are currently at.

The User may exercise the control over the cookies from the browser's settings and with other tools. However, if certain cookies are blocked, this may not allow the User to sign up, sign in on the Website, access some parts of the Website or use it in its entirety.

2.7. ADDITIONAL INFORMATION

2.7.1. What additional information can be gathered from Users browsing the Website?

When a User browses the Website, **CIONE GROUP** may gather information that does not identify the User directly, such as the User's IP address, geographical location, a log of how the services and Website are used, and other data that cannot be used to identify the User, such as, for example, browsing habits through third-party services.

Likewise, the Website uses "Google Analytics" as its third-party analysis service. The information gathered with the "Google Analytics" service is used to analyse trends, administrate the Website, track User's activity on the Website and gather demographic information about all Users of **CIONE GROUP's** Website as a whole.

2.7.2. Can the CIONE GROUP make changes to its privacy policy?

CIONE GROUP reserves the right to make changes to this policy in compliance with the latest legislation and jurisprudence of the bodies responsible for ensuring compliance with such regulations or practices in industry. In these cases, any changes made to the Website will be communicated before they are implemented with enough time for the Users to keep this in mind before they use the Website.