

# WEBSITE PRIVACY POLICY

For more information on Interest-based Advertising and your choices regarding it, review the Digital Advertising & Analytics / Interest-Based Ads section of this Policy.

Effective as of [\[5/29/2024\]](#)

Last updated as of [\[5/29/2024\]](#)

This Policy describes how Metro Optics, including all direct and indirect subsidiaries (collectively “Practice,” “we,” “our,” or “us”), collect, use, disclose, and safeguard your personal information.

This Policy applies to individuals who access this website and any other websites that link to this Policy (collectively “Sites”). This Policy governs your use of our Sites.

From time to time, we may change this Policy. If we do, we will post an amended version on this webpage. Please review this Policy periodically.

This Privacy Policy covers the following topics:

## **1. THE INFORMATION WE COLLECT**

## **2. HOW DO WE USE YOUR INFORMATION**

## **3. SHARING INFORMATION WITH THIRD PARTIES**

## **4. COOKIES AND OTHER TRACKING TECHNOLOGIES**

## **5. DIGITAL ADVERTISING & ANALYTICS / INTEREST-BASED ADS**

## **6. THIRD-PARTY LINKS & PLUG-INS**

## **7. YOUR STATE PRIVACY RIGHTS**

## **8. YOUR CHOICES**

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**10. UPDATING YOUR INFORMATION**

**11. SECURITY**

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**14. CONSUMERS WITH DISABILITIES**

**15. CONTACT**

# 1. THE INFORMATION WE COLLECT

For the purpose of this Policy, personal information is any information about an identifiable individual.

We collect the following types of personal information:

## Information You Provide

When using our Sites or our services, you may provide us with your personal information through a variety of methods, including the following:

- *Create an Account.* If you create an account with us, you will provide us with your name, email address, birth date, and you will create a password for future logins.
- *Book an Appointment.* If you book a store appointment, you will provide us with your name, email address, birth date, physical address, and phone number.
- *Apply for a Job.* If you apply for a job through one of our Sites, we will collect any information you provide in your application, including, but not limited to, work authorization information, visa status, desired salary, language proficiency, educational background, employment history, and references. You may also choose to voluntarily provide optional information such as race, gender, or whether you are disabled.
- *Survey.* If you are participating in a survey, you may provide your gender and age, income, ethnicity, family size, and marital status.
- *Business Information.* We may collect personal information from business clients or vendors, including company name, physical address, phone number, email address, and credit card information.
- *HIPAA.* This Practice is subject to the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). These affiliates and brands may collect additional information that is considered “protected health information” (“PHI”) as defined by HIPAA. When the information that we collect is considered PHI, we will handle that information in accordance with our Notice of Privacy Practices. Please visit that notice for information on our privacy practices, our legal duties, and your rights concerning your PHI.

## Information as You Navigate Our Sites

We automatically collect certain personal information through your use of the Sites, such as the following:

- *Usage Information.* For example, the pages on the Sites you access, the frequency of access, and what you click on while on the Sites.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.

- *Mobile Device Information.* Aggregated information about whether the Sites are accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from Site visitors on a city-regional basis.

### **Third Party Information**

In some cases, we may receive certain personal information from you about a third party. For example, when you refer a friend, you will provide the email address of a third party. If you submit any personal information about another individual to us, you are responsible for making sure you have the authority to do so and to allow us to use their personal information in accordance with this Policy.

## **2. HOW DO WE USE YOUR INFORMATION**

We may use the personal information we collect to improve our Sites and to protect our legal rights. In addition, we may use the personal information we collect to:

- Process your account registration;
- Process and fulfill your order, including sending you emails to confirm your order status and shipment, and to provide other related communications;
- Send you our newsletter;
- Identify your preferences to customize our communications and marketing;
- Manage and record your settings, consents, communications and opt-out choices;
- Provide information regarding vision, vision care, and vision correction;
- Administer a Promotion;
- Review your job application;
- Communicate with you about our Sites or to inform you of any changes to our Sites;
- Allow you to find an eyecare professional or doctor, distributor, store or sales consultant in your area and schedule eye exams or similar appointments with such persons;
- Operate and improve the Sites, including to analyze visits to the Sites and learn about our visitors so we can operate the Sites and improve our products and services and deliver the best user experience;
- Create audiences for our advertisements, target our advertisements, and generate reports about the performance of our advertisements;
- Communicate with you, including responding to your inquiries;
- Comply with the law and to maintain the integrity and security of our Sites;
- Defend our legal rights and the rights of others;

- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Us and to otherwise fulfill our legal obligations;
- Fulfill any other purposes for which you provide it, or any other purpose we deem necessary or appropriate;

### **3. SHARING INFORMATION WITH THIRD PARTIES**

We may share the personal information that we collect about you in the following ways:

- We engage service providers to perform services in connection with the operation of our business. We may share personal information with service providers to the extent necessary for them to provide services to you or us that are aligned with the purposes outlined above. Examples of these services include payment processing and authorization, text messaging services, fraud protection and credit risk reduction, product customization, order fulfillment and shipping, marketing and promotional material distribution, website evaluation, data analysis and, where applicable, data cleansing.
- In proceeding with your online order, you agree that any information associated with the order, such as the delivery name and address (if different from yours), will be processed using service providers.
- Personal information collected through our Sites may be shared between the brands and affiliates, including future affiliates that are owned or operated by Practice
- We also share personal information with selected third parties for their own marketing purposes (except for your phone number or biometric information). This also includes information collected through pixels and other tracking technologies operated by third parties, as described elsewhere in this Policy. See the “**YOUR CHOICES**” section of this Policy for more information.
- We may release personal information if we believe in good faith that: (i) the law or legal process requires it; (ii) we have received a valid administrative request from a law enforcement agency; or (iii) such release is necessary or appropriate (in our sole discretion) to protect the rights, property, or safety of Practice, or any of our respective affiliates, service providers, customers, or (iv) as Practice deems necessary to resolve disputes, troubleshoot problems, prevent fraud and otherwise enforce the Terms of Use.
- We may also share your information with your consent or as otherwise disclosed at the time of data collection or sharing.
- As with any business, it is possible that as ours develops, we might go through a business transition, such as a merger, acquisition by another company, or the sale of all or a portion of our assets, or buying online

stores or other assets, including at bankruptcy. In such transactions, information about customers will likely be transferred.

## **4. COOKIES AND OTHER TRACKING TECHNOLOGIES**

We use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”) when you visit our websites including our blogs and client portals (“Sites”), and use the services provided through our Sites (“Services”). This Cookie Policy explains how we use Cookies and how you can manage them. Please review the Privacy Policy featured on our Sites to learn more about our privacy practices.

This Cookie Policy covers the following topics:

1. COOKIES AND ONLINE TRACKING TECHNOLOGIES WE USE
2. HOW YOU CAN MANAGE COOKIES
3. HOW TO CONTACT US

### **COOKIES AND ONLINE TRACKING TECHNOLOGIES WE USE**

“Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We may use the following types of Cookies:

#### **Strictly Necessary Cookies**

These Cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these Cookies, but some parts of the Sites will not then work. These Cookies do not store any personal information.

#### **Performance Cookies**

These Cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Sites. They help us to know which pages are the most and least popular and see how visitors move around the Sites. If you do not allow these Cookies we will not know when you have visited our Sites and will not be able to monitor its performance. We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Sites and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject

to Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#). We may use Cookies and similar technologies third-party vendors provide to collect information on user behavior (e.g., screens and pages visited, buttons and links clicked, limited information entered, and user taps and mouse movements). This information enables us to monitor and improve the user experience.

### **Functional Cookies**

These Cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these Cookies, then some or all of the Services may not function properly.

### **Targeting Cookies**

These Cookies may be set through our Sites by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other websites. If you do not allow these Cookies, you will experience less targeted advertising.

### **Social Media Cookies**

These Cookies are set by a range of social media services that we have added to the Sites to enable you to share our content with your friends and networks. They are capable of tracking your browser across other websites and building a profile of your interests. This may impact the content and messages you see on other websites you visit. If you do not allow these Cookies, you may not be able to use or see these sharing tools.

## **HOW YOU CAN MANAGE COOKIES**

### **Your Preferences**

When you first visit our Sites, you may be presented with a banner that offers you choices about whether to accept or reject Cookies or tracking technologies of different types.

### **Browser Settings**

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Sites.

You can find out more about Cookies and how to manage them by visiting [www.AllAboutCookies.org](http://www.AllAboutCookies.org)

### **Platform Controls**

You can opt out of Cookies set by specific entities following the instructions found at these links:

- Google: <https://adssettings.google.com>
- Facebook: <https://www.facebook.com/about/ads>

- Microsoft: <https://account.microsoft.com/privacy/ad-settings/>

### **Advertising Industry Resources**

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the [Network Advertising Initiative's website](#) or the [Digital Advertising Alliance's website](#). For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative's Mobile Choices website](#).

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

## **5. DIGITAL ADVERTISING & ANALYTICS/INTEREST-BASED ADS**

We may partner with ad networks and other ad serving providers (“Advertising Providers”) that serve ads on behalf of us and others on the Sites and non-affiliated sites. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your use of the Sites and other sites or apps over time, including information about relationships among different browsers and devices (“Interest-based Advertising”).

You may choose whether to receive some Interest-based Advertising by submitting opt outs. Some Advertising Providers may participate in the Digital Advertising Alliance’s (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit <http://www.aboutads.info/choices>, and <http://www.aboutads.info/appchoices> for information on the DAA’s opt-out program for mobile apps.

Some of these companies may also be members of the Network Advertising Initiative (“NAI”). To learn more about the NAI and the opt-out options for their members, see <http://www.networkadvertising.org/choices>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective.



We support the ad industry's 2009 Self-regulatory Principles for Online Behavioral Advertising (<https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf>) and expect that ad networks we directly engage to serve you Interest-based Advertising will do so as well, though we cannot guarantee their compliance. We are not responsible for the effectiveness of, or compliance with, any third parties' opt-out options or programs or the accuracy of their statements regarding their programs.

Advertising Providers may use data collected in connection with our advertising campaigns for the following purposes:

- For measurement and insight reporting (to produce and provide us with reports measuring the impact and performance of our advertising campaigns).
- To produce benchmarking reports to share with their other customers, but such benchmarking reports will not identify you.
- To target our ad campaigns to specific groups of individuals having particular characteristics.
- To improve and optimize advertising services (for example, to support the objectives of our ad campaigns, improve the effectiveness of their own advertising services and determine the relevance of ads to individuals).
- To personalize ads that the Advertising Providers show, including to enhance user profiles with inferred interests.
- For their internal purposes, including (i) to promote and ensure the safety and security on and of their products and services; (ii) to detect and prevent malicious, deceptive, fraudulent, invalid or illegal activity; (iii) for research and development purposes; and (iv) to maintain the integrity of and to improve their products and services.
- To combine it with other data collected by Advertising Providers in order to provide greater insights in respect of our advertisements.

We may also work with service providers that collect data about your use of the Sites and other sites or apps over time for non-advertising purposes subject to their privacy policies. We use analytics providers such as Google Analytics to gather and analyze aggregated anonymous user information. For more information about Google Analytics, please visit <https://policies.google.com/technologies/partner-sites>. You can opt out of Google's collection and processing of data generated by your use of the Sites by going to <http://tools.google.com/dlpage/gaoptout>.

We use web analytics tools to enhance user experience by optimizing the efficiency, design, and quality of the Sites. Our analytics tools use cookies and similar technologies to collect and analyze information related to user behavioral metrics on the Sites, such as mouse movements, clicks, user inputs, scrolling, access time, visit duration, pages viewed, IP address (including approximate location), operating system, and page reloading. These tools provide insight into what works and what doesn't work for users of the Sites and

they allow us to, for example, identify and repair technical errors such as broken links that impair the Sites' functionality. The web analytics tools also help us reconstruct the user experience to better understand, for example, where users may be encountering frustration or impediments to using the Sites.

We use a website analytics tool that provides session replay, heatmaps, funnels, form analytics, feedback campaigns, and similar features/functionality. This session replay software may record your clicks, mouse movements, scrolling, form fills (keystrokes) in non-excluded fields, pages visited and content, time on site, browser, operating system, device type (desktop/tablet/phone), screen resolution, visitor type (first time/returning), anonymized IP address, location (city/country), language, and similar metadata. This software does not collect information on pages where it is not installed, nor does it track or collect information outside your web browser.

We use this web-based analytics software because it gives us a tool to track the online behavior of visitors while on the Sites and lets us replay visitors' actions. This tool gives us the opportunity to make the Sites better and, in turn, provide you with an enhanced online experience as well. Thanks to this tool, we are able to gain insight on how you and other visitors use the Sites; for example, whether you can easily locate a particular page on the Site or whether it takes multiple clicks to get to that page. Information about these small choices and interactions are of paramount value to us, as they can easily make your experience better and more intuitive and, more importantly, allow us to provide you with a more seamless, customer-friendly e-shopping experience while on the Sites.

We may use pixel tags (also known as web beacons and clear GIFs) to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the services and response rates. Our Advertising Providers may use pixel tags to collect information for the purposes described above.

## **6. THIRD-PARTY LINKS & PLUG-INS**

The Sites may provide links to third-party websites or apps, including our social media pages. We do not control the privacy practices of those websites or apps, and they are not covered by this Policy. You should review the privacy policies of other websites or apps that you use to learn about their data practices.

The Sites may also include integrated social media tools or "plug-ins," such as social networking tools offered by third parties. If you use these tools to share information or you otherwise interact with social media features on the Sites,

those social media companies may collect information about you and may use and share such information in accordance with their own policies, including by sharing such information with us or the general public. Your interactions with third-party social media companies and the use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to read the privacy policies for any social media accounts you create and use.

## **7. YOUR STATE PRIVACY RIGHTS**

Depending on the state in which you reside, you may have certain privacy rights regarding your personal information. Please review the sections below if you are a California, Nevada, or Virginia resident. For other state residents, your privacy rights may include (if applicable):

- The right to confirm whether or not we are processing your personal information and to access such personal information;
- The right to obtain a copy of your personal information that we collected from and/or about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another controller without hindrance, where the processing is carried out by automated means;
- The right to delete personal information that we collected from and/or about you, subject to certain exceptions;
- The right to correct inaccurate personal information that we maintain about you, subject to certain exceptions;
- The right, if applicable, to opt out of the processing of your personal information for purposes of (1) targeted advertising; (2) the “sale” of your personal information (as that term is defined by applicable law); and (3) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;
- If we are required by applicable law to obtain your consent to process sensitive personal information, the right to withdraw your consent; and
- The right not to receive discriminatory treatment by us for the exercise of your privacy rights.

We use cookies and other tracking technologies to display advertisements about our products to you on nonaffiliated websites, applications, and online services. This is “targeted advertising” under applicable privacy laws. When we engage in those activities, we sell personal information (i.e., information from cookies) to third-party advertisers and analytics companies. We may transfer your personal information (e.g., name, email address, and year of birth) to joint marketing partners. Under applicable privacy laws this may be considered a “sale” of personal information to third parties. We do not use personal information for profiling in furtherance of decisions that produce legal or similarly significant effects concerning individuals.

To exercise your rights, please submit a request through our interactive webform available [here](#) or by emailing us at [privacy@teamvisionteam.com](mailto:privacy@teamvisionteam.com).

If legally required, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the individual on whose behalf you are making such request. To do so, we will ask you to verify data points based on information we have in our records. If you are submitting a request on behalf of another individual, please use the same contact methods described above. If we refuse to take action regarding your request, you may appeal our decision through our interactive webform available [here](#) or by emailing us at [privacy@teamvisionteam.com](mailto:privacy@teamvisionteam.com). If you would like to opt out of targeted advertising, you may alter your cookie preferences by toggling off the three cookie options in the Cookie Management Tool [here](#).

## Universal Opt-Out Mechanisms

The Sites [do not](#) recognize the Global Privacy Control (“GPC”) signal.

## 11. YOUR CHOICES

To opt out of our email marketing or to unsubscribe from our email newsletters, you can contact our customer service department using the information in the “**CONTACT**” section below, or you can use the link provided at the bottom of each marketing message or newsletter. If you choose to opt out, you will continue to receive all email communications related to our transactions with you.

If you would like to update your mailing information or want your name and address removed from our direct mailing list, you can contact us using the information in the “**CONTACT**” section below.

You can control the tools on your mobile devices. For example, you can turn on and off the GPS locator or push notification on your phone. Please consult your mobile device’s user guide for instructions on clearing cookies, enabling and disabling location services, and disabling push notifications.

## 12. CHILDREN’S PRIVACY

We understand the importance of protecting children’s privacy, especially in an online environment. Our Sites are not intentionally designed for or directed at children less than 16 years of age. We do not knowingly collect personal information from children under the age of 16 without the consent of the child’s

parent or guardian. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any personal information relating to children that we have collected, we will take steps to securely remove it from our systems.

### **13. UPDATING YOUR INFORMATION**

You may request to view, update, or correct your personal information by contacting our privacy office at the information provided in the “**CONTACT**” section below. In order to protect your privacy, we will take steps to verify your identity before granting you access to the information or enabling you to make corrections.

### **14. SECURITY**

We maintain reasonable and appropriate safeguards to help protect your personal information from loss and from unauthorized acquisition. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal information, we cannot guarantee absolute security.

### **15. DO NOT TRACK SIGNALS**

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but we are not responsible for the completeness or accuracy of this third-party information.

### **16. TRACKING ACROSS TIME AND TECHNOLOGIES DISCLOSURE**

Some information about your use of the service and certain third-party services may be collected by us or by third parties using tracking technologies across time and services and used by us and third parties for purposes such as to associate different devices you use and deliver relevant ads and/or other content to you on the service and certain third-party services.

### **17. CONSUMERS WITH DISABILITIES**

We are committed to ensuring this Policy is accessible to individuals with disabilities. To request this Policy in an alternative format, please reach out to us at the Contact information provided below.

## **18. CONTACT**

If you have questions or wish to contact us about this Policy, please direct inquiries to:

Caleb Clark  
TeamVision  
Email: [privacy@teamvisionteam.com](mailto:privacy@teamvisionteam.com)