

Reply Website/Platform Privacy and Cookie Policy

Reply S.p.A. (“**Reply**,” “**we**,” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this Reply Website/Platform Privacy and Cookie Policy (“**Cookie Policy**”). This Cookie Policy describes the information we collect and process related to our Reply website/platform (the “**Reply Website/Platform**”) using automated data collection technologies, and what choices you have with respect to the information.

This Cookie Policy applies to registered users of the Reply Website/Platform as well as those who visit the Reply Website/Platform (the “**User**”).

Data Controller or Covered Business

When visitors access the Reply Website/Platform, their personal data may be processed, e.g. during their browsing on the Reply Website/Platform; other personal data may be voluntarily provided by Reply Website/Platform visitors if they register to the Reply Website/Platform, as described below.

The Data Controller (or covered business) is Reply S.p.A. (registered office: Corso Francia 110, Torino - Italy).

Types of Processed Data

Navigation data

IT systems and software procedures adopted for the functioning of the Reply Website/Platform, as a part of their normal functioning, collect various items of personal data. This personal data is transferred as a part of the normal course of events when using the Internet (based on TCP/IP protocol).

This personal data is not collected in order to be linked to the specific persons it refers to. However, its nature is such that, through processing and collating of data held by third parties, it may be possible to identify navigating users.

This class of information includes IP addresses or the domain names of the computers of Users visiting the Reply Website/Platform, the addresses of requested resources (in URI, Uniform Resource Identifier format), the time of the request, the method used to forward the request to the web server, the size of the file obtained as response, the numerical code indicating the status of the response provided by the web server (e.g., successful, error, etc.) and other parameters relative to operating system and to User’s IT environment.

This data is only to be used for anonymous aggregated statistical information relative to use of the Reply Website/Platform and for control of correct functioning of the Reply Website/Platform in order to optimize its functionality in relation to the offered services.

Please note that navigation data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the Reply Website/Platform or any linked website. If no such investigations are conducted, the data relative to web contacts is destroyed within a few days.

Data provided voluntarily by User

In the registration form, visitors may provide requested personal data in order to submit their registration. Moreover, in the Reply Website/Platform section dedicated to registered users some further data may be collected by the Reply Website/Platform during the browsing session of logged-in registered users e.g. for the download of access-restricted contents.

When e-mail messages are voluntarily sent to the addresses indicated in the address section of Reply Website/Platform, this implies the acquisition of certain items of the requesting party's personal data, including the requesting party's e-mail address (necessary for response to requests).

Cookies

The Reply Website/Platform uses "Cookie" technology. For information regarding the Cookies used by the Reply Website/Platform, how they are used and how to manage them, consult the "Cookie Policy" section of this document.

Processing Procedures and Security Measures

Personal data is processed by Reply and/or its group of companies (hereinafter, "**Reply Group Companies**"), and by third parties providing support on the Reply Website/Platform by means of automated and non-automated equipment. This data is processed only for no longer than is required to fulfil tasks for which the said data was collected. Conformity with specific security measures is ensured in order to prevent data losses, illicit or incorrect use, and unauthorized access.

Rights of Concerned Individuals

The individuals referred to by personal data collected by the Reply Website/Platform have the right, at any time, to request access to their personal data and to obtain the correction or deletion of said data, or to limit the processing of their data, or to oppose its processing. The individuals also have the right to data portability.

The individuals, whose data are processed after explicit consent, have the right to withdraw their consent at any time without prejudice to the lawfulness of the processing based on the consent given before withdrawal.

EU residents also have the right to lodge a complaint with the competent Supervisory Authority.

Such requests are to be addressed by writing us at: Reply S.p.A., Corso Francia n. 110, Torino, Italy or by e-mailing us at:

- privacy@reply.com (regarding the Reply website, reply.com)
- webinar@reply.com (regarding the Reply Webinars Platform, webinars.reply.com)

California residents may have additional rights and choices. Please see [CCPA Privacy Notice for CA Residents](#) for more information.

Children

Reply does not knowingly use its Reply Website/Platform to request and process data from under age individuals, according to privacy law and further laws and regulations applicable in their country of residence.

Cookie Policy

The Reply Website/Platform uses cookies and other tracking technologies (i.e. beacons, pixels, Google Analytics) (the “**Cookies**”) to make its services simple and effective for Reply Website/Platform Users.

Cookies are text files, or parcels of information sent from a Reply Website/Platform to the User's browser, which are memorised on the computer and automatically returned to the server every time the Reply Website/Platform is accessed.

There are various types of Cookies, some used to make using the Reply Website/Platform more efficient, others to enable certain functions. Cookies and the other tracking technologies can:

- memorize entered preferences;
- prevent Users from having to re-enter the same information several times during their visit, for example username and password;
- analyses in an anonymous way the use of the services and contents provided by the Reply Website/Platform visited in order to optimize the browsing experience and services offered;
- allow Users of the Reply Website/Platform to be recognized by third parties, i.e. Facebook, LinkedIn, Google, during the navigation on such third parties platforms in order to be informed about Reply initiatives possibly promoted on these platforms (retargeting);
- carry out anonymous statistical analysis.

Types of Cookies and other tracking technologies used by the Reply Website/Platform

The types of Cookies and other tracking technologies used by the Reply Website/Platform are listed below and grouped according to the purpose for which they are used.

Technical and strictly necessary Cookies

These Cookies allow certain portions of the Reply Website/Platform to function correctly and are essential in order to allow the User to browse the Reply Website/Platform and use its features (e.g. session cookies). **Such Cookies do not require prior consent from the User.**

There are two categories of technical cookies:

- *Persistent*. used to store information, such as the login name and password of the User, in order to prevent the same User from typing them again each time he/she visits the Reply Website/Platform. These remain stored on the computer even once closed the browser.
- *Session*. used to store temporary information, allowing the User to link actions that are executed during a specific session, and are removed from the computer when the browser is turned off.

Such Cookies, always sent by the Reply Website/Platform, are necessary for the correct visualization of the Reply Website/Platform and, in relation to the technical services offered, will therefore always be used and sent (unless the User modifies the settings in his or her browser). Included in this category are the persistent Cookies used to allow the User to register with the Reply Website/Platform and access Reply Website/Platform restricted area.

The aforementioned Cookies used by the Reply Website/Platform avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the Users' navigation of the Reply Website/Platform, and do not permit the acquisition of identifying personal information regarding the User.

This type of Cookies include also **third-party analytics cookies** used to gather information regarding how the User uses the Reply Website/Platform for aggregated statistical analysis and to improve and simplify the use of the Reply Website/Platform.

The Reply Website/Platform uses **Google Analytics** (a web service provided by Google, Inc.) in anonymous way in order to measure visits to the Reply Website/Platform and to improve use of the Reply Website/Platform. This type of Cookie gathers information anonymously regarding how the Users use the Reply Website/Platform. For more information, please visit the Google Analytics site.

Reply does not use this information to identify Users or to combine such data with other data.

Technical-Functional Cookies (implemented only for the Reply website reply.com)

These Cookies are used to memorize certain settings selected by the Users in order to provide them with enhanced functionality and personalisation and improve User visit to the Reply Website/Platform. **Such Cookies require prior consent from the User.**

Technical-Functional Cookies can have the duration of a session but they are generally persistent and sent from the Reply Website/Platform.

The information gathered by these Cookies is anonymous and cannot track the User's behaviour outside the Reply Website/Platform.

Remark: The Reply Website/Platform may use functions developed by third parties that upon User consent may install their cookies. Such as icons of the social network for allowing Users to share the contents of the Reply Website/Platform on the social network platforms such as LinkedIn, Facebook, Twitter ("**Social Network**") or for the use of third party software services requested by the Users (e.g. software to generate maps and other software offering additional services highlighted explicitly in the Reply Website/Platform). Such social buttons are only links which, if voluntarily clicked by the User, redirect this latter to the shown Social Network platforms. This might place cookies from those Social Network on the User's device. These Social Network providers are responsible for setting up their own cookies and of their own Cookie Policies which will apply to the User and which the User may refer to. Reply has no control over the process used by Social Network providers to collect information relating to User and associated with the data they have. If the User doesn't want such Cookies it is sufficient not to click on such social buttons. If the User afterwards intends to remove them, he/she may follow the instructions in the privacy policies of these Social Network providers.

Profiling Cookies

The Reply Website/Platform uses third-party tracking technologies which **require prior consent from the User.**

In particular, some Reply webpages includes tracking pixels of third parties (for example LinkedIn, Facebook, Google) that are used to create profiles of those users providing consent as said above. Such information within Users' profile, upon their consent, are used to recognize them when they are browsing on third party social platforms and to inform them about content promoting Reply's initiatives (retargeting).

Reply's role is limited to allow the installation of such third party technologies after the Users provide their consent through the Reply Website/Platform. The creation of Users' profile and the retargeting of such Users to Reply's contents on third parties sites and platforms are activities performed by third parties.

Reply cannot read or use Users' information collected by third-party tracking technologies.

The Third party tracking technologies for retargeting purposes are:

- **Facebook** Pixel, a technical instrument managed by Facebook Inc. 1601 Willow Road, Menlo Park, California, 94025, USA ("**Facebook**").
- **LinkedIn** Pixel, a technical instrument managed by LinkedIn Corporation ("**LinkedIn**").
- **Google** Pixel, a technical instrument managed by Google LLC ("**Google**").

At any time, the Users can decide to remove these tracking technologies following the instructions provided below.

User's consent to Cookies and tracking technologies

For EU residents, according to Cookie Law (2009/136/CE Directive), the Reply Website/Platform is not obliged to request consent for Technical and strictly necessary Cookies, as they are necessary in order to provide the services requested. They are therefore installed automatically by the Reply Website/Platform during the User's first visit to any page of the Reply Website/Platform.

Profiling and Technical-Functional Cookies shall only be installed upon User prior consent. For this reason, when the User accesses the Reply Website/Platform a special banner ("Cookie banner") informs the User that (i) the Reply Website/Platform uses Technical-Functional and Profiling Cookies, and that (ii) by clicking on the appropriate button on the Cookie banner or by going to the Cookie Preferences section, the User can accept the use of such Cookies.

We will track User consent (if any) by means of a dedicated technical Cookie. Should the User decides to delete technical cookies, we will lose track of User consent and, as a consequence, the Cookie banner will be presented to the User again at his or her next visit of the Reply Website/Platform and the User will therefore be asked for consent again, and has to select again the Cookie(s) Preferences. If the User uses a different internet browser, the User will also have to block these Cookies again because User choices, like his/her associated cookies, depend on the browser and device (computer, tablet, smartphone etc.) used to visit the Reply Website/Platform. The Cookie banner shall be displayed in any case according to applicable regulation.

If the User doesn't wish to give him or her consent to any Technical-Functional or Profiling Cookies, the User at any time may freely decide to block or disable specific group of Cookies by one or more of the following means, without affecting his or her ability to visit the Reply Website/Platform and avail of the relevant contents:

- by clicking on X at the top right of the Cookie banner;
- via modifications to the settings in the Cookie Preferences section (see the section below for more information);
- via specific browser settings used to browse the Reply Website/Platform (see the section below for more information).

Please, note that certain areas or features of the Reply Website/Platform rely on the use of Cookies, meaning that disabling these Cookies could prevent the User from visualizing certain parts of the Reply Website/Platform correctly or using specific features offered by the Reply Website/Platform.

How to manage Cookies used by the Reply Website/Platform

Cookie Preferences section

At any time, the Users can set and change their preferences regarding Cookies using the Cookie

Preferences section. The Cookie Preferences section can be accessed either via the Cookie banner or the specific link available in each webpage of the Reply Website/Platform. It allows User to view the groups of Cookies we store (as outlined above in *Types of Cookies and other tracking technologies used by the Reply Website/Platform*), customize the Cookies preferences and withdraw the consents previously given for each Cookie category.

Remember that editing the Cookie Preferences will not remove any existing cookies from the browser, it'll only affect the way Cookies are used in future.

The Reply Website/Platform is scanned with our Cookie scanning tool regularly to maintain a list as accurate as possible.

Browser settings

In all cases, the User also has the opportunity to delete individual Cookies from his or her device by consulting the 'Help' menu in the internet browser.

To delete Cookies from the internet browser of a smartphone/tablet, the User should refer to the device's user manual to find further information.

The User can learn more about cookies and how to block cookies on different types of browsers by visiting <https://www.allaboutcookies.org>.

Further methods for disabling Third-Party Profiling Cookies

In addition to disabling and/or deleting Profiling Cookies (indicated in this document at the section above "*Profiling Cookies*"), the User can follow the instructions in the privacy and cookies sections of the Third Parties websites/platforms (i.e., Facebook, LinkedIn, Google) that differs from the ones adopted by the Reply Website/Platform and which are unrelated to the latter.

Users are advised to take careful note of the information and policies regarding the use of Cookies produced by third parties also to be aware of any further modifications to such policies made by the third parties independently of Reply.

Additional Information for EU/EEA Residents

Reply provides you with this Cookie Policy pursuant to Section 13 of EU Regulation No. 679/2016, concerning the protection of individuals with regarding to the processing of personal data.

The Data Controller for the processing of your personal data is Reply S.p.A., with a registered office in Corso Francia n. 110, Turin, Italy, represented by the *pro tempore* legal representative.

If you have questions or concerns about our collection or use of your personal data, you can contact our EU Data Protection Officers (DPO) at:

- DPO Italy: dpo.it@reply.it
- DPO Germany: dpo.de@reply.de
- DPO UK: dpo.uk@reply.com

If you are unsatisfied with the way in which we have handled your personal data or any privacy query or request that you have raised to us, you have a right to complain to the appropriate National Data Protection Authority ("DPA"). To find the contact details of the DPA in your country of residence, please visit the EU Commission's **directory of DPAs**.

Additional Information for California Residents

If you are a resident of the State of California, you are entitled to request information regarding the disclosure of your personal information to third parties for direct marketing purposes, and opt-out of such disclosures. Please note that we do not share your personal information with non-affiliated third parties for such purposes, and we do not sell your personal information. California residents may have additional privacy rights and choices. Please see [CCPA Privacy Notice for CA Residents](#) for more information.

Additional Information for Brazilian Residents

Reply provides you with this Cookie Policy pursuant to Law No. 13.709/2018 (LGPD), concerning the protection of individuals with regarding to the processing of personal data.

If you have questions or concerns about our collection or use of your personal data, you can contact us at:

- Brazil: privacy.security.br@reply.com

We will answer data subjects' requests within 15 (fifteen) days upon receipt.

Updates to This Cookie Policy

We may make changes to this Cookie Policy from time to time. The "Last Update" noted at the top of this page shows when this Cookie Policy was last revised. Any changes will become effective when we post the revised Cookie Policy on this site.

Contact Us

If you have any comments or questions regarding this Cookie Policy, Cookies retention period or our data handling practices, please contact us at privacy@reply.com. You may also send us a letter at the following address:

Reply S.p.A.
Corso Francia n. 110
Torino, Italy