

Reply Marketing Privacy Notice

Reply S.p.A. (“**Reply**,” “we,” or “us”) respects your privacy and is committed to protecting it through our compliance with this Reply Marketing Privacy Notice (“**Privacy Notice**”), and our Privacy and Cookie Policy available in the footer of the Reply website/platform. This Privacy Notice covers the collection, use and disclosure of personal data collected in relation to Reply’s marketing practices. This Privacy Notice also describes your legal rights with respect to such activities.

The Portuguese version of this document is available [here](#).

DATA COLLECTION

We collect or otherwise obtain information relating to you in a variety of ways. Such information may include personal data (i.e., information that alone or in combination with other information identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with you).

The information we may gather about you includes:

Information you provide. We may ask you to provide, or you may choose to provide, information such as, without limitation, your name, e-mail address, phone number, professional information (e.g., company, job title), preferred language, university, link to your social media account, etc.), demographic information. Such information may be provided to us at various times, including, without limitation:

- When you fill in specific forms (online or offline);
- When you register on the Reply website (www.reply.com) or on other Reply platforms;
- When you register for an event or webinar via the Reply website/platform or by contacting us offline; and
- When you request information about or receive products and services from Reply or Reply Group Companies (as defined below).

Information collected through your business relationship with Reply and/or Reply Group Companies. We may collect information from you through your business relationship with Reply and/or with any of its group of companies (hereinafter, “**Reply Group Companies**”), including when you have shown interest in Reply and/or Reply Group Companies initiatives (e.g. during business meetings with Reply and/or Reply Group Companies employees and/or collaborators, events, conferences, etc.). In this case, the personal data may be collected from you by Reply or Reply Group Companies employees, based on your business interaction with them.

Information Collected From Combined Sources. In some cases, personal data that you provide us via the Reply websites (e.g., www.reply.com, www.reply.com/br) and/or Reply platforms (e.g., Reply Webinar Platform, Reply Events Platform, Reply Online Services) (collectively, the “**Reply Services**”) may be combined with personal data collected through your business relationship with Reply or Reply Group Companies employees. In such cases, the data may be used for all purposes defined in the “Data Use and Processing” section below, unless and until you notify us that you do not longer wish us to use the data for these purposes.

Information we do not seek. We generally do not seek information that may be considered “special” or “sensitive” personal data (e.g., government-issued identification numbers or information related to your racial or ethnic origin, political opinions, religious or other beliefs, health, criminal background, or trade union membership) for marketing purposes, and we ask that you do not provide such information.

DATA USE AND PROCESSING

Information not collected through your business relationship with Reply and/or Reply Group Companies. Personal information you provide to us when you fill in specific forms will be entered into a Reply Customer Relationship Management (CRM) system and may be used by Reply and/or Reply Group Companies for the following purposes:

- **Access to the Reply Services.** We may use your personal information to enable you to register to use the Reply Services via online user registration forms that are accessible at www.reply.com. The legal basis for using the personal information you provide to us for this purpose is the contractual relationship between you and Reply through which we provide the Reply Services to you. This data will be kept until you unsubscribe from the Reply Services.
- **Provision of Reply Services Content.** We may use your personal information to enable you to use the Reply Services content, which is available only to registered users, and allows you to participate in surveys, save your favourite content, and fulfil any requests you make through the Reply Services or by e-mail or via communication tools. The legal basis for using the personal information you provide us for this purpose is the contractual relationship between you and Reply through which we provide the Reply Services to you. This data will be kept until you unsubscribe from the Reply Services.
- **Automatic notification service.** We may use your personal information to implement, if explicitly requested by you at the time of registration, the automatic notification service for subjects and content of interest. The legal basis for using the personal information you provide us for this purpose is the contractual relationship between you and Reply through

which we provide the Reply Services to you. This data will be kept until you unsubscribe from the Reply Services.

- **Event participation.** We may use your personal information to enable you to participate in events organized by Reply and/or Reply Group Companies, including webinars, and to manage these events. The legal basis for using the personal information you provide us for this purpose is the contractual relationship between you and Reply through which we provide the Reply Services to you. The data will be kept until you unsubscribe from the Reply Services.
- **Comply with applicable laws.** We may use your personal information to comply with applicable laws, regulations, and legislation, as well as to comply with orders issued by authorities that are lawfully permitted to do so, including with respect to the prevention and detection of information technology offenses, as well as to manage any complaints or disputes. The legal basis for using the personal information you provide us for this purpose is compliance with the aforementioned laws, regulations, legislation, and/or orders. This data will be kept during the time that you are subscribed to the Reply Services, or longer if necessary to pursue the purposes mentioned immediately above.
- **Reply marketing activities.** Subject to your express consent and until you withdraw said express consent or otherwise opt-out of our use of your personal data, we may use your personal information for our marketing activities. Such marketing activities may include sending promotional and commercial communications regarding services or products offered by Reply, Reply Group Companies or Reply co-marketing or joint pre-sales activity business partners, to provide information about our events or webinars. These communications may be sent via automated tools (e.g., SMS, MMS, fax, e-mail, web applications, etc.) or traditional marketing channels (e.g., operator-assisted phone calls and/or post mail, etc.). The legal basis for using the personal information you provide us for this purpose is your consent. If you do not wish to be contacted in connection with our marketing activities, please see “Exercising Your Right to access personal data and other rights” below. You may also disregard our direct mail or online advertisements.

You will be required to provide the above-mentioned consent via online forms available through the Reply Services. If you refuse or withdraw your consent for the marketing activities described above, your [personal] data will be processed only for the other purposes described above.

If you provide the above-mentioned consent and receive an e-mail from Reply or Reply Group Companies, we may use technical cookies to track the following: email-receipt, e-mail

opening, any further action you take with respect to the e-mail (e.g., clicking on a link in the e-mail), or your accessing any Reply Services and viewing at least some portion of the Reply Services content.

Such personal information will be used only for technical reasons, particularly to confirm that the e-mail was correctly sent, and received, as well as to verify for statistical purposes (in aggregated [or anonymized] form) any access to the Reply Services.

To register online to use the Reply Services, you should enter the required data in the applicable form. It is compulsory to enter the personal data marked in the form with an asterisk (*). Failure to provide compulsory data, or the partial or incorrect provision of such data will result in your inability to register to use (or use) the Reply Services.

Information collected through your business relationship with Reply and/or Reply Group Companies. We may collect your personal information through your communication with Reply and/or Reply Group Companies employees, or collaborators with whom Reply and/or Reply Group Companies have a business relationship, and to whom you have expressed an interest in our initiatives, services and/or products. This information may include your name, e-mail address, telephone number, job title, department, as well as any projects and/or initiative you may be associated with when engaging with Reply and Reply Group Companies. This information may be collected during business meetings, events, conferences, etc. and will be entered into the CRM system by authorized staff and used by Reply and Reply Group Companies for the following purposes:

- For our marketing activities, unless you opt-out of our use of (or otherwise notify us that you do not want us to use) your personal data for this purpose. Such marketing activities may include sending promotional and commercial communications regarding services or products offered by Reply, Reply Group Companies or Reply co-marketing or joint pre-sales activity business partners, to provide information about our events, webinars, or further services. These communications may be sent via automated tools (e.g., SMS, MMS, fax, e-mail, web applications, etc.) or traditional marketing mechanisms (e.g., operator-assisted phone calls and/or post mail, etc.). The legal basis for using the personal information is the legitimate interest of Reply to perform promotional activities related to its products and or services. If you do not wish to be contacted by phone in connection with our marketing activities, please see “Exercising Your Right to access personal data and other rights” below.

In relation to e-mail we send you, we may use technical cookies to track the following: email-receipt, e-mail opening, any further action you take with respect to the e-mail (e.g., clicking

on a link in the e-mail), or you accessing the Reply Services and viewing at least some portion of the Reply Services content.

Such personal information will be processed only for technical reasons, particularly to confirm that the e-mail was correctly sent, and received, as well as to verify for statistical purposes (in aggregated [or anonymized] form) any access to the Reply Services.

Reply may use this your personal data for marketing purposes, as described above, for the duration of your business relationship with us, or until you otherwise notify us that you do not want us to use your personal data for this purpose.

- For recommending content of interest, unless you otherwise notify us that you do not want us to use your personal data for this purpose. Such recommendations may be made by Reply via automated processing, including profiling, or customized marketing via automated tools (e.g., SMS, MMS, fax, e-mail, etc.) and online. Our recommendations may be formed using machine learning algorithms and/or automated personal data segmentation based on selection criteria such as your company, industry of your business, and/or your job position in combination with information regarding your participation in our events or webinars or engagement with our products or services. This information is not collected using cookies nor other tracking online technologies. The legal basis for using the personal information is the legitimate interest of Reply to perform customized marketing activities.

Reply may use this your personal data for marketing purposes, as described above, for the duration of your business relationship with us, or until you otherwise notify us that you do not want us to use your personal data for this purpose.

In addition to the purposes above, we may also use your information:

- To protect the rights, safety, property, or operations of Reply or Reply Group Companies, you, or others; and
- Comply with applicable law and respond to requests and communications from law enforcement authorities or other government officials.

Our use of cookies related to your use of the Reply Services. For further information about how we use of cookies when you interact with the Reply Services, please refer to our Privacy and Cookie Policy available in the footer of the Reply Services.

Processing method. Processing activities on your [personal] data may be performed by Reply and/or Reply Group Companies either manually or automatically according to the purposes indicated above and for the time strictly necessary to pursue these purposes.

BASIS FOR PROCESSING PERSONAL DATA

Applicable law in certain countries requires us to set out in this Privacy Notice the legal basis upon which we rely to process personal data.

Consent: We may rely on consent that you provide us at the point of collection of your personal data to use such information for the purposes outlined herein, for example when you provide your consent during the registration to a Reply event or platform.

Legitimate interests: We may rely on our legitimate interest to process your personal data, provided that such interests are not overridden by your interests, fundamental rights, or freedoms. In particular, as provided in the “Data Use and Processing” section above we may also have other legitimate interests and, if so, we will make clear what those interests are at the relevant point in time.

Compliance with legal obligations: As provided in the “Data Use and Processing” section above, we may also process your personal data to comply with applicable law and respond to requests and communications from law enforcement authorities or other government officials.

Data transfers outside your country of residence: For the purposes specified in this Privacy Notice, your personal data may be processed outside of the EU (if you are an EU resident) or outside of your country of residence, particularly to countries where Reply Group Companies are based (see “[Office Locations & Contacts](#)” at www.reply.com). Reply ensures that your data is safe and secure throughout any transfer, as provided by any applicable data protection law.

If you have questions or concerns about the legal basis upon which we collect and use your personal data, you may contact us 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)
- xchange@reply.com (regarding the Reply Xchange Platform).

SHARING YOUR DATA WITH THIRD PARTIES

In connection with one or more of the purposes outlined in the “Data Use and Processing” section above, we may disclose your information to:

- Entities within the Reply Group Companies or their employees, including in Italy and/or other countries;

- Individuals or legal entities appointed by Reply to perform technical interventions, repairs, routine and maintenance, the Reply Services restoration and updating, consultants, service providers, business partners, vendors in Italy and/or abroad entrusted to perform activities related to the purposes outlined in the “Data Use and Processing” section above;
- Competent governmental and public authorities, in each case to comply with legal or regulatory obligations or requests;
- Relevant third parties as part of corporate transactions, such as a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding); and
- Other third parties as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to enforce our terms and conditions; (d) to protect our operations or those of any of our affiliates; (e) to protect our rights, privacy, safety, or property, and/or those of our affiliates, you, or others; and (f) to allow us to pursue available remedies or limit the damages that we may sustain.

Under the circumstances of co-marketing or joint pre-sales activities, your personal data may also be communicated to the involved third parties (e.g. business partners, sponsors, vendors, etc.). This Privacy Notice does not address, and we are not responsible for, the privacy practices of any such third parties who are acting independently of Reply and/or Reply Group Companies.

All of these disclosures may result in the transfer of your information to countries or regions with data protection laws that differ from those in your country of residence, as described in this Privacy Notice.

In cases where your information is transferred outside of your country of residence, we take steps to ensure that appropriate safeguards are in place to protect your personal data. For further details relating to the transfers described above and the adequate safeguards used with respect to such transfers, please contact us at privacy@reply.com.

Your data will not be shared with anyone else, besides the above.

THIRD-PARTY SITES AND PLATFORMS

When you attend any Reply webinar available via the Reply platforms, such webinars may be hosted on different external platforms specified for each webinar. This Privacy Notice does not address, the privacy practices of any third parties.

Any website or platform (e.g., social media sites, apps, etc.) hosted by a third party other than Reply may also collect information about you, and the processing of your information by these third parties

is governed by their privacy Notices or policies. Therefore, we encourage you to review the privacy notices and policies offered by any third-party website or platform that you utilize.

DATA SECURITY

We make use of reasonable technical and organizational security measures and safeguards that are designed to help protect the data that we collect, use, and retain. Please note, however, that no security measure is perfect, and there can be no absolute assurance of security.

EXERCISING YOUR RIGHT TO ACCESS PERSONAL DATA AND OTHER RIGHTS

We strive to provide you with choices regarding your information that we collect or that you provide us. We have created mechanism to provide you with the following control over your information:

- **Marketing and promotional offers from us.** If you do not wish to have your personal information used by us to promote or market the Reply Services, you can opt-out by clicking the “unsubscribe” link on any e-mail you receive from us or 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)
 - xchange@reply.com (regarding the Reply Xchange Platform)
- **Targeted advertising.** If you do not want us to use information that we collect or that you provide us to deliver customized marketing information, you can advise us emailing us at privacy.recommendation@reply.com.

Accessing, correcting, updating, deleting, and requesting information about your personal information. You can review and change your personal information or request access to, correct or delete your personal information by emailing us at privacy@reply.com, webinar@reply.com, xchange@reply.com, according to the specific Reply website/platform listed above. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Because we want to avoid taking action regarding your personal data at the direction of someone other than you, only you or an “Authorized Agent” permitted to act on your behalf may submit a request. An “**Authorized Agent**” means a natural person or a business entity you have authorized to act on your behalf by providing your written permission. Please note, we may deny a request from an Authorized Agent if they do not submit proof that they have been authorized by you to act on your behalf. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an Authorized Agent; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Additional information for EU/EEA residents.

Reply provides you with this Privacy Notice 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.uk

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 Privacy Notice pursuant to Law No. 13.709/2018 (LGPD), that is concerning the personal data protection of individuals with regarding to the processing of 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.

DATA RETENTION

We will retain your personal data for those periods necessary to fulfil the various purposes outlined in this Privacy Notice, and as explained in the "Data Use and Processing" section above, unless a longer retention period is required or permitted by law.

UPDATES TO THIS PRIVACY NOTICE

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

CONTACT US

If you have any comments or questions regarding this Privacy Notice 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