Information given to data subject (User) in pursuance of Art. 13 of Legislative Decree 196/03

Introduction

Legislative Decree no. 196 of June 30, 2003 ("Privacy Code") concerns protection of individual and other entities with regard to processing of personal data.

In pursuance of Article 13 of Legislative Decree no. 196 of 30 June 2003, we inform the User of this website (the "Site") that the processing of personal data collected in the registration process will be done with respect to principles of fairness, lawfulness, transparency and for the safeguard of confidentiality and rights of the interested parties ("User/s").

We request and recommend that the Site User carefully reviews this document governing the purposes and procedures of processing personal data provided by the User when browsing through the Site and login masks present therein. The User will also become aware of any updates thereto due mainly to changes in regulatory provisions.

a) Purposes and procedures of data processing

In accordance with Article 4, paragraph 1, letter b) of Legislative Decree no. 196/2003, "personal data" must be understood as "any information regarding the natural person, identified or identifiable, also indirectly, through reference to any other information, including a personal identification number".

Personal data must be understood as the name, contact information and addresses, as well as any other information of the User that can be obtained, either directly or indirectly, from the latter.

Personal data of the User provided by filling out an appropriate form on the Site shall be processed by Reply S.p.A. as the data controller for the purposes indicated below:

- 1) to enable registration of the User to the event and for purposes strictly necessary and/or connected with the event participation.
- 2) to comply with obligations set forth in laws, regulations and by Community legislation, as well as by provisions set by authorities authorised to do so by law or by supervisory and inspection authorities, including for the prevention and investigation of computer-related crimes;
- 3) to carry out and manage marketing campaigns (for example: notification by email and/or SMS/MMS of promotion or business communications, events and correspondence regarding services offered by Reply S.p.A. or by Companies of the Group that pertain to the content requested by the user).

In relation to the purposes indicated above, personal data processing is carried out by persons specifically appointed to do so and is performed through information systems and manual procedures, applying principles strictly related to the mentioned purposes and for the time strictly necessary to perform them and, in any case, also in consideration of technological innovations in such a way as to minimise, by means of suitable preventative security measures, the risk of their destruction or loss, whether by accident or not, of unauthorised access to the data or of processing operations that are either unlawful or inconsistent with the purposes for which the data have been collected.

Except for those specified in the following paragraph c), the User's personal data shall be stored on the server/database of the Data Controller located in the territory of the European Union.

b) Obligatory/Voluntary nature of providing personal data

The Site registration forms contain only required fields (indicated with an asterisk [*]).

The collection of personal data marked with an asterisk must be understood as necessary for carrying out the activities as referred to in letter a) sections 1), 2); failure to provide this data or allow their processing means that it will not be possible to register for the events selected.

With reference to the purposes as referred to in letter a) section 3), Reply S.p.A. will request that the User provides a specific, but optional, consent.

c) Communication and distribution

Data collected during Site registration may be shared for the purposes as referred to in letter a) sections 1, 2, 3 and 4 and, in particular, to access the section dedicated to registered Users and for the output and online supply of content requested by the User, to subjects, natural and/or legal persons, appointed by Reply S.p.A. to carry out technical repairs, routine and non-routine maintenance, Site restoration and updating, as data controllers or processors.

The complete and updated list of these third parties appointed as data controllers is available at the head office of the data controller as indicated at the end of this document.

In any case, data will not be subject to disclosure.

d) Data Subject's Rights

Data subjects may write to the following e-mail address, privacy@reply.it or send a letter to Reply S.p.A., Corso Francia 110, Turin to verify and integrate, update or rectify their data and/or exercise their rights as set forth in Section 7 of the Code as specified below:

- 1) Data subjects have the right to obtain confirmation of whether or not personal data is held concerning them, even if not yet recorded and their disclosure in intelligible form.
- 2) The data subject shall have the right to be informed:
 - a) of the source of the personal data;
 - b) of the purposes and procedures of the processing;
 - c) of the logic applied to the processing, if the latter is carried out with the help of electronic tools;
 - d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);
 - e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
- 3) The data subject shall have the right to obtain:

- a) updating, rectification or, where interested therein, integration of the data;
- erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
- c) certification to the effect that the operations as per letters a) and b)have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
- 4) The data subject shall have the right to object, in whole or in part:
 - a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
 - b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials.

Data controller of these processing is the legal representative of Reply S.p.A., with headquarters in Turin, Corso Francia n. 110.