

## Privacy notice pursuant to Section 13 of Legislative Decree 196/03

Pursuant to Section 13 of Legislative Decree no. 196 of 30 June 2003, “*Codice in materia di protezione dei dati personali*” (hereinafter “**Privacy Code**”), Reply S.p.A. (hereinafter “**Reply**”) provides you, herein below, the Privacy notice regarding the processing<sup>1</sup> of your personal data<sup>2</sup>.

### a) Purposes of processing and obligatory nature of personal data to be provided

Without prejudice to the provisions contained herein and/or in the Cookie policy below mentioned, your personal data, collected by filling out specific forms, online and/or offline, or through other procedures, shall be inserted in a Customer Relationship Management (“CRM”) system and processed by Reply for the following purposes:

- 1) to enable the registration to the Reply website, accessible at the URL <https://www.reply.com> (hereinafter, “**Site**”), to access to the Site contents available only to registered users, to save favourite contents, to satisfy the requests carried out through the Site or by e-mail or other communication tools, as well as to implement, if requested, the automatic notification for subjects and contents of interest;
- 2) to allow you to take part in Reply events and to manage your attendance.

Your data will be processed also to comply with obligations set forth in laws, regulations and EU legislation, and authorities instructions as well as to manage possible complains.

In order to allow your Site registration, you shall enter your data in the registration form. The collection of personal data marked with an asterisk (\*) is compulsory for carrying out the above referred activities; failure to provide this data or an incorrect provision prevents you to register to the Site or to carry out other activities mentioned in paragraph 1).

### b) Further data processing subject to specific consent (Articles 23 and 130 of Privacy Code)

Subject to your expressed consent and until your withdrawal, your personal data, inserted into CRM, will be also processed for marketing purposes, such as the sending of promotional and commercial communications regarding Reply or Reply subsidiaries and affiliates services, including corporate events invitations, through automated tools (e.g. sms, mms and/or e-mails) and traditional marketing mechanisms (e.g. operator-assisted phone calls and/or mailing).

Therefore, you will be required, through on line forms on the Site or other procedures, to provide a specific consent to personal data processing for marketing purposes. Should you deny or withdraw your consent, your personal data will be processed only for the purposes referred to in letter a) above.

Should you receive the e-mail marketing subject to your consent, the following actions will be tracked through technical cookies:

- e-mail receipt;
- e-mail opening;
- any further action taken on the e-mail (e.g. click on a link);
- at least an access to one of the Site contents.

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<sup>1</sup> In accordance with Article 4, paragraph 1, letter (a) of Legislative Decree 196/2003, ‘processing’ means “*any operation, or set of operations, carried out with or without the help of electronic or automated means, concerning the collection, recording, organisation, keeping, interrogation, elaboration, modification, selection, retrieval, comparison, utilization, interconnection, blocking, communication, dissemination, erasure and destruction of data, whether the latter are contained or not in a data bank*”

<sup>2</sup> In accordance with Article 4, paragraph 1, letter b) of Legislative Decree no. 196/2003, “personal data” means “*any information regarding the natural person, identified or identifiable, also indirectly, through reference to any other information, including a personal identification number*”.

Your personal data collected according to the above mentioned procedure will be processed only for technical reasons and, in particular, in order to confirm the e-mail correct transmission and receipt and to verify the Site accesses for a statistic purpose and in an aggregate way.

Regarding the cookies used by the Site, please refer to the Site Privacy Policy, available at:

[https://www.reply.com/en/Shared%20Documents/Privacy\\_Policy\\_eng.pdf](https://www.reply.com/en/Shared%20Documents/Privacy_Policy_eng.pdf), placed in the bottom section of each Site page.

### **c) Processing methods**

The data processing may be made manually or through electronic procedures, in accordance with a logic strictly related to the above mentioned purposes in letters a) and b) and for the time strictly necessary. Having regard to the state of the art, appropriate security measures shall be implemented in order to ensure security and confidentiality of the personal data, preventing the risk of accidental or unlawful destruction or accidental loss, unauthorized disclosure or access.

### **d) Data Controller, Data Processors and categories of persons in charge of the processing**

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

Data Processor within Reply is the Marketing & Communications Director of Reply. An updated list of the “*internal*” Data Processors is available at the registered office of the Data Controller.

Your personal data shall be processed, within Reply structure, by (natural) persons duly appointed as persons in charge of the processing (hereinafter “**Data Handlers**”) pursuant to Section 30 of the Code, who have received appropriate operating instructions. Personal data processed for the purpose referred to in letter b) are accessible, in particular, to Reply employees belonging to the “central” Marketing & Communications Direction.

### **e) Categories of third parties that might process your personal data**

In addition to Reply employees, your personal data may be shared with third parties entrusted to perform some activities functional to the purposes referred to in letter a) and, subject to your consent, for the purposes referred to in letter b), appointed as Data Processors or Data Handlers. These third parties include natural and/or legal persons entrusted by Reply to carry out technical activities, ordinary and extraordinary maintenance, Site restoration and updating; consultants and Italian and/or foreign Reply subsidiaries and affiliates entrusted with the management and the execution of the marketing campaigns.

The updated list of the third parties appointed as Data Processors is available at the registered office of the Data Controller.

Your personal data shall also be communicated to the Data Protection Authority and other public body authorized to request the data.

In any case, your data will not be subject to dissemination.

### **f) Data Subject’s Rights pursuant article 7 of Privacy Code**

You have the right to access at any time to your personal data and to exercise the other rights set out by section 7 of Privacy Code, including the right to be informed of the source of the data, to obtain rectification and updating of the data or, where there is an interest, integration, erasure or blocking of data processed unlawfully.

You have also the right to object, in whole or in part, on legitimate grounds, to the processing of personal data for the marketing purposes referred to in letter b), through automated tools (e.g. sms, mms and/or e-mails) and traditional marketing mechanisms (e.g. operator phone calls and/or mails). This is without prejudice to your right, should you prefer to be contacted exclusively through conventional mechanisms, to object to the processing of your data for marketing purpose only via automated means.

Any request shall be sent in writing, by e-mail to: [unsubscribe@reply.eu](mailto:unsubscribe@reply.eu) or by mail to: Reply S.p.A., Corso Francia 110, Torino. The right to object to data processing for direct e-mail marketing (DEM) may also be carried out through the specific unsubscribe link.

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