

Information pursuant to Article 13 of Regulation (EU) 2016/679

With this document, pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter, “**Regulation**”), Reply S.p.A. (hereinafter, “**Reply**”), provides you with information on the processing of your personal data.

This information is issued to interested parties who wish to register for the Reply “Code For Kids”, initiative, which has been created as part of Reply’s training programme and is focused on disseminating digital culture to children (aged between 4 and 8, as a guideline) and which allows children to take part in a series of workshops on coding and computational thinking (hereinafter, “**Initiative**”).

To register for and participate in the Initiative it is necessary to fill in the online form – accessible via the link codeforkids.reply.com – with the required data. Provision of the personal data requested in the online form is compulsory in order to fulfil the purposes described below (except for the “NOTE” field); failure to provide the personal data or the provision of partial or inaccurate data shall make it impossible to complete registration for the Initiative.

For the purposes of personal data processing, 'children' means individuals below the age of 16 years or below the age that may be specified by the individual member states, pursuant to Article 8 of the Regulation, who are not deemed legally capable of giving their consent to the processing of their personal data. In the event of the processing of children’s personal data, consent is required from the holder of parental responsibility over the child, so that the rights granted under the legislation may be asserted on behalf of the data subjects. Reply shall not knowingly collect data from children without the consent of the holder of parental responsibility. In accordance with applicable laws, the holder of parental responsibility must give his or her consent to the processing of the child’s personal data. The holder of parental responsibility shall avail him or herself of the rights referred to in Articles 15 to 22 of the Regulation on behalf of the child.

A) Purposes for which the data processing is necessary. Legal basis for the processing. Data retention period

Personal data – collected by means of the registration procedure on specific forms, online and/or offline, or by means of other procedures – may include name, surname, e-mail address, landline and/or mobile telephone number, address, nationality, and date of birth. Subject to prior explicit consent in writing, the special categories of data referred to in Article 9 of the GDPR may also be processed, such as, by way of example, data that may reveal the data subject's state of health.

Without prejudice to the further clarifications contained in this document and/or the Privacy Policy concerning cookies, referred to *below*, your personal data, as well as the data of the children over

whom you exercise your responsibility as a parent exercising parental responsibility, tutor, guardian or foster carer, shall be collected at the time of registration for the Initiative through the completion of masks or *forms*, online or offline, or by other methods, and processed by Reply – with the aid of electronic or computerised means and/or manual methods – for the following purposes:

- 1) to enable registration for and participation in the Initiative, as well as for the management of the Initiative.

The legal basis for the processing of the personal data other than the special categories of data is constituted by the need to perform contractual or pre-contractual obligations and/or to comply with legal obligations. Any personal data other than the special categories of data shall be retained for the duration of your registration on the Initiative and for a maximum of 12 months.

The legal basis for the processing of data relating to special categories of data is constituted by the data subject's explicit consent to the processing. Any data which qualifies as "special categories of data" shall be retained for the time strictly necessary to achieve the aforementioned purposes, without prejudice to any retention conditions provided for by laws or regulations.

- 2) Your data shall also be processed for the purpose of fulfilling the obligations provided for by laws, regulations and by Community legislation, as well as by provisions laid down by authorities authorised to do so by law or by supervisory and monitoring bodies, including by way of preventing and detecting cyber offences, as well as in order to handle any complaints or disputes. The legal basis for the processing is the legislation applicable to each type of processing. The data shall be retained for the duration of your registration in the service, in accordance with standard limitation periods.

B) Other purposes of the processing following specific and express consent. The legal basis for the processing. Data retention period

Subject to your prior express consent and until that consent is withdrawn, any of your personal data that may be included in a customer relationship management system (hereinafter "**CRM**") may also be processed for marketing purposes, in other words, by way of example, for the sending of promotional and commercial communications related to services offered by Reply or by the companies within the Reply Group, as notification of Reply events or webinars, both by automated means of contact (e.g. SMS and MMS messages, fax, e-mail, and web applications) and by traditional means of contact (such as telephone calls with an agent and traditional mail).

You shall then be prompted via an online form on the Reply website or by other procedures to provide your consent to the processing of your personal data for such purposes. If you withhold or withdraw your consent to the marketing purposes described above, your data shall be processed only for the purposes referred to in point A).

In relation to the e-mails that will be sent, the following actions performed by you shall be tracked by means of technical cookies:

- actual receipt of the e-mail;
- opening of the e-mail;
- any action carried out (such as clicking on a link contained in the e-mail);
- accessing the Reply website and viewing at least one item of content.

Any of your personal data that may be collected in accordance with the method described above shall be processed only for technical reasons and, in particular, in order to confirm that the e-mail was properly sent and received, as well as to verify for statistical purposes, in aggregated form, any accessing of the website. The legal basis for the processing is the consent you have given where appropriate. Your personal and contact details shall be retained until consent is withdrawn.

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As regards the cookies used on the Reply website, please consult our Privacy Policy, which can be accessed via the following link

https://www.reply.com/en/Shared%20Documents/Privacy/Privacy_Policy_eng.pdf

C) Processing methods

The data processing may be performed by means of manual, computerised and electronic tools, in accordance with logics that are strictly related to the purposes indicated above and for the time strictly necessary to pursue said purposes; as well as, in any case, for the purpose of protecting, where applicable and depending on the state of the art, the security and confidentiality of the personal data by means of suitable procedures for preventing the risk of loss, unauthorised access, illicit use and dissemination.

D) Data Controller and Data Protection Officer

The Data Controller is Reply S.p.A., with its registered office at Corso Francia 110, Torino (Italy), in the person of its pro tempore legal representative.

The contact details of the Data Protection Officer (DPO) are:

- Group DPO: Jörg Woste
- DPO for Italy: Alberto Canadè, Via Robert Koch 1/4, 20152 Milano – ITALY
- DPO for Germany: Jörg Woste, Bartholomäusweg 26, 33334 Gütersloh – GERMANY
- DPO for the UK: Richard Veryard, 38 Grosvenor Gardens, London SW1W 0EB – UK

E) Categories of third parties that may become aware of the data

As well as being processed by employees of Reply, your personal data may be processed on behalf of Reply, in their capacity as Data Processors, by the companies of the Reply Group, within Italy and/or abroad, and by third parties (natural and/or legal persons commissioned by Reply to undertake technical activities involving repair or regular and extraordinary maintenance, activities for the remediation and updating of the Reply website; consultants) to whom functional activities may be assigned for the fulfilment of the purposes referred to under points A) and B) above.

Subject to your explicit consent, your personal data may be communicated or transferred to third parties (e.g. partners or sponsors of Reply S.p.A.), who may pursue autonomous marketing objectives related to their own products and/or services. In the event of co-marketing or joint pre-sales activities, your personal data may also be communicated to the third parties involved (e.g. business partners, sponsors, vendors, etc.).

In any cases in which the aforementioned third parties act as autonomous Data Controllers, it shall fall to each third party receiving the data to provide you with appropriate information regarding its own purposes and to collect your consent, where necessary.

Your personal data may also be communicated to the Data Protection Authority and to any other public body authorised to request the data.

The data shall not, in any case, be subject to dissemination.

F) Transfer of data outside the EU

Your data shall not be transferred abroad to countries outside the EU.

G) Right of the data subject

You have the right to request access to and the rectification or deletion of personal data or restriction of the processing concerning you or the children for whom you have responsibility or to object to such processing, as well as the right to data portability.

You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on the consent given before its withdrawal.

You have the right to object to the processing of data on the basis of legitimate interest.

You have the right to lodge a complaint with the competent Supervisory Authority.

These rights may be exercised by e-mail, by writing to the address privacy@reply.com or, by post to Reply S.p.A., Corso Francia 110, Torino, Italy. The right to object to the use of your data for

marketing purposes may also be exercised by means of the appropriate *unsubscribe* link included within each e-mail.