

## **Privacy notice pursuant to Section 13 of EU Regulation no. 679/2016**

Pursuant to Section 13 of EU Regulation no. 679/2016, concerning the protection of individuals with regard to the processing of personal data (hereinafter, “**Regulations**”), Reply S.p.A. (hereinafter, “**Reply**”), hereby provides you with the Privacy notice regarding the processing of your personal data.

This Privacy notice applies to two categories of Data Subject:

A - Data Subjects who fill in specific forms, online and/or offline or through other procedures (e.g. during the registration to the Reply website or an event/webinar). In this case, the personal data are provided by the Data Subject,

B - Data Subjects who have a business relationship with Reply and may have shown interest in Reply initiatives (e.g. during business meetings with Reply employees and/or collaborators, events, conferences, etc.). In this case, the personal data are collected from you by Reply employees, based on your business interaction with them.

In some cases, personal data from the Reply website (A) may be combined with personal data from Reply employees (B). In such cases, the data may be used for all purposes defined below, unless and until a data subject opts out of certain purposes.

### **A) Personal data, collected when you fill in specific forms, online and/or offline, or through other procedures**

#### **1) Purposes of the processing for which the data processing is necessary. The legal basis for the processing. The length of time the data will be kept.**

Data input through these procedures may include name, email address, phone number, organization or university, job title and preferred language, you may also choose to link to your social media account.

Without prejudice to the additional information contained herein and/or in the cookie Privacy Policy mentioned below, these personal data, collected when you fill in specific forms, online and/or offline, or through other procedures, shall be entered in a Customer Relationship Management (hereinafter “**CRM**”) system and processed by Reply for the following purposes:

- a) to enable you to register on the Reply website, accessible via the URL [www.reply.com](http://www.reply.com) (hereinafter, “**Reply Website**”), to use the Reply Website contents available only to

registered users, including participation in surveys, to save favourite contents, as well as for the fulfilment of any requests you may make through the Reply Website or by e-mail, or with other communication tools; to implement, if explicitly requested during the registration stage, the automatic notification service for subjects and contents of interest to you. The legal basis for the processing is the contractual relationship with Reply following registration to the website, pursuant to ordinary limitation periods;

- b) to enable you to take part in events organised by Reply, including webinars, and to manage these events. The legal basis for the processing is the contractual relationship through which you may participate in the events and webinars. The data will be kept after your enrolment on the website, pursuant to ordinary limitation periods;
- c) Your data will also be processed to comply with obligations set forth in laws, regulations and EU legislation, as well as to comply with orders issued by authorities that are lawfully permitted to do so, or by supervision and control authorities, including in respect of the prevention and detection of information technology offences, as well as to manage any complaints or disputes. The legal basis for the processing is the legislation applicable to each type of processing. The data will be kept for the duration of your enrolment on the website, pursuant to ordinary limitation periods

In order to register online to the Reply Website, enter the required data in the specific form. It is compulsory to enter the personal data marked with an asterisk (\*) in the online forms in order to pursue the activities described above; failure to provide this data, or the partial or incorrect provision of such data will therefore make it impossible for you to register to the website or to use the requested contents. Entering data not marked with an asterisk is purely optional; failure to provide this data or the partial or incorrect provision of such data will therefore not prevent you from registering on the Reply Website.

**2) Additional purposes of the processing subject to specific and explicit consent. The legal basis for the processing. The length of time data will be kept.**

Subject to your explicit consent and until the withdrawal of said consent, your personal data, entered into the CRM, may also be processed for marketing purposes, such as the sending of promotional and commercial communications regarding services offered by Reply or by Reply Group companies, to give information about Reply events or webinars, using automated tools (e.g. SMS, MMS, fax, e-mails and web applications) and traditional marketing mechanisms (e.g. operator-assisted phone calls and/or mailing).

You will therefore be required, by means of online forms on the Reply Website or by other procedures for this purpose, to provide your consent to personal data processing. Should you deny or withdraw

your consent to the marketing purposes described above, your data will be processed only for the purpose 1) referred to in letter A) above.

Should you give your consent and receive the e-mail, the following actions you perform will be tracked through technical cookies:

- e-mail receipt;
- e-mail opening;
- any further action taken on the e-mail (e.g. clicking on a link in the e-mail);
- gaining access to the Reply Website and viewing at least one of the contents.

Your personal data collected according to the abovementioned procedure will be processed only for technical reasons and, in particular, in order to confirm that the e-mail was correctly sent and received, as well as to verify for statistical purposes, in aggregated form, any access to the Website. The legal basis for the processing is the consent you have given. Your personal data may be kept until consent is withdrawn.

## **B) Personal data, collected when you have a contact with Reply employees**

### **1) Purposes of the processing subject to legitimate interest. The legal basis for the processing. The length of time data will be kept.**

Your personal data are collected following a contact with Reply employees or collaborators with whom there is a business relationship and are entered into the Reply CRM database by Reply staff in case You've expressed an interest in our initiatives, services or products (e.g. during business meetings, events, conferences, etc.).

Data input through these procedures may include name, email, telephone, job title, department, as well as any projects and initiatives you may be associated with.

Unless and until you advise us otherwise, your personal data may be processed for marketing purposes, such as the sending of promotional and commercial communications regarding products and services offered by Reply or by Reply Group companies or by Reply business partners in case of co-marketing or joint pre-sales activities, to give information about Reply events or webinars, using automated tools (e.g. SMS, MMS, fax, e-mails and web applications) and traditional marketing mechanisms (e.g. operator-assisted phone calls and/or mailing).

In relation to the e-mails we send to you, the following actions you perform will be tracked through technical cookies:

- e-mail receipt;
- e-mail opening;
- any further action taken on the e-mail (e.g. clicking on a link in the e-mail);
- gaining access to the Reply Website and viewing at least one of the contents.

This tracking data will be processed only for technical reasons and, in particular, in order to confirm that the e-mail was correctly sent and received, as well as to verify for statistical purposes, in aggregated form, any access to the Website.

The legal ground for the processing is the legitimate interest of Reply (or of Reply Group companies or of Reply business partners in case of co-marketing or joint pre-sales activities) to perform promotional activities related to its products and services.

We may keep your data for the duration of our business relationship with you may opt out of marketing communications at any time.

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With regard to the cookies used by the Reply Website, please refer to the Privacy Policy, available at: [www.reply.com/en/Shared%20Documents/Privacy/Privacy\\_Policy\\_eng.pdf](http://www.reply.com/en/Shared%20Documents/Privacy/Privacy_Policy_eng.pdf).

### **C) Processing method**

The data processing may be made manually or through electronic procedures, in accordance with a logic 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 measures to prevent the risk of loss, unauthorized access, illicit use and dissemination.

### **D) Data Controller and Data Protection Officer**

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

The contact details of the Data Protection Officer are:

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

## **E) Categories of third parties that may become privy to your personal data**

In addition to Reply employees, your personal data may be processed, on behalf of Reply, as Persons in charge of the processing, by Reply Group companies, in Italy and/or abroad and by third parties (individuals or legal entities, appointed by Reply to perform technical interventions, repairs, routine and extraordinary maintenance, Reply Website restoration and updating; consultants; business partners, vendors in Italy and/or abroad) entrusted to perform certain activities functional to the purposes 1) and 2) referred to in letter A) and purposes 1) referred to in letter B).

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.). If the third parties should act as autonomous data controller, they will be in charge to inform You regarding their own purposes and to collect your consent, if necessary.

Your personal data may also be communicated to the Data Protection Authority and all other public bodies authorized to request the data.

Apart from the third parties identified above your data will not be subject to any wider dissemination.

## **F) Extra-EU Data transfer**

Your personal data may be transferred abroad in extra-EU countries, in particular in the countries where Reply companies have office locations (see the section Office Locations & Contacts on [www.reply.com](http://www.reply.com)).

In absence of an Adequate Decision by the European Commission regarding the adequacy about the level of safeguard assigned to data subjects by those Countries, under art. 45 GDPR, the transfer shall undergo the prior signature of the Standard Contract Clauses adopted by the European Commission in accordance with article 46, 2, c).

A copy of the contractual standard clauses may be obtained by writing an e-mail to:

[privacy@reply.com](mailto:privacy@reply.com) or a mail to: Reply S.p.A., Corso Francia 110, Torino.

## **G) The right to access personal data and other rights**

You have the right to request access to your personal data and to obtain the correction or deletion of said data, or to limit the processing of data relating to you, or to oppose its processing. You also have the right to data portability.

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

You have the right to oppose in relation to the processing of data relating to you based on legitimate interest.

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

Such rights may be exercised in writing, by e-mail, to: [privacy@reply.com](mailto:privacy@reply.com) or by mail to: Reply S.p.A., Corso Francia 110, Torino. The right to object to the use of data processing for marketing purposes may also be carried out through the specific *unsubscribe* link within each e-mail.