

## Reply Website Privacy and Cookie Policy

Reply S.p.A. (“**Reply**,” “**we**,” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this Reply Website/Platform Privacy and Cookie Policy (“**Cookie Policy**”). This Cookie Policy describes the information we collect and process related to our Reply website (the “**Reply Website/Platform**”) using automated data collection technologies, and what choices you have with respect to the information.

This Cookie Policy applies to registered users of the Reply Website/Platform as well as those who visit the Reply Website/Platform.

### Data Controller or Covered Business

When visitors access the Reply Website/Platform, their personal data may be processed, e.g. during their browsing on the Reply Website/Platform; other personal data may be voluntarily provided by Reply Website/Platform visitors if they register to the Reply Website/Platform, as described below.

The Data Controller (or covered business) is Reply S.p.A. (registered office: Corso Francia 110, Torino - Italy).

### Types of Processed Data

#### *Navigation data*

IT systems and software procedures adopted for the functioning of the Reply Website/Platform, as a part of their normal functioning, collect various items of personal data. This personal data is transferred as a part of the normal course of events when using the Internet (based on TCP/IP protocol).

This personal data is not collected in order to be linked to the specific persons it refers to. However, its nature is such that, through processing and collating of data held by third parties, it may be possible to identify navigating users.

This class of information includes IP addresses or the domain names of the computers of users visiting the Reply Website/Platform, the addresses of requested resources (in URI, Uniform Resource Identifier format), the time of the request, the method used to forward the request to the web server, the size of the file obtained as response, the numerical code indicating the status of the response provided by the web server (e.g., successful, error, etc.) and other parameters relative to operating system and to user’s IT environment.

This data is only to be used for anonymous aggregated statistical information relative to use of the Reply Website/Platform and for control of correct functioning of the Reply Website/Platform in order to optimize its functionality in relation to the offered services.

Please note that navigation data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the Reply Website/Platform or any linked website. If no such investigations are conducted, the data relative to web contacts is destroyed within a few days.

### *Data provided voluntarily by user*

In the registration form, visitors may provide requested personal data in order to submit their registration. Moreover, in the Reply Website/Platform section dedicated to registered users some further data may be collected by the Reply Website/Platform during the browsing session of logged-in registered users e.g. for the download of access-restricted contents.

When e-mail messages are voluntarily sent to the addresses indicated in the address section of Reply Website/Platform, this implies the acquisition of certain items of the requesting party's personal data, including the requesting party's e-mail address (necessary for response to requests).

### *Cookies*

The Reply Website/Platform uses "Cookie" technology. For information regarding the Cookies used by the Reply Website/Platform, how they are used and how to manage them, consult the "Cookie Policy" section of this document.

## **Processing Procedures and Security Measures**

Personal data is processed by Reply and/or its group of companies (hereinafter, "**Reply Group Companies**"), and by third parties providing support on the Reply Website/Platform by means of automated and non-automated equipment. This data is processed only for no longer than is required to fulfil tasks for which the said data was collected. Conformity with specific security measures is ensured in order to prevent data losses, illicit or incorrect use, and unauthorized access.

## **Rights of Concerned Individuals**

The individuals referred to by personal data collected by the Reply Website/Platform have the right, at any time, to request access to their personal data and to obtain the correction or deletion of said data, or to limit the processing of their data, or to oppose its processing. The individuals also have the right to data portability.

The individuals, whose data are processed after explicit consent, have the right to withdraw their consent at any time without prejudice to the lawfulness of the processing based on the consent given before withdrawal.

EU residents also have the right to lodge a complaint with the competent Supervisory Authority. Requests are to be addressed to e-mail address [privacy@reply.com](mailto:privacy@reply.com).

California residents may have additional rights and choices. Please see [CCPA Privacy Notice for CA Residents](#) for more information.

## **Children**

**Reply does not knowingly use its Reply Website/Platform to request and process data from under age individuals, according to privacy law and further laws and regulations applicable in their country of residence.**

## **Cookie Policy**

The Reply Website/Platform uses Cookies and other tracking technologies (i.e. beacons, pixels, Google Analytics) to make its services simple and effective for Reply Website/Platform visitors and registered users.

Cookies are text files, or parcels of information sent from a Reply Website/Platform to the user's

browser, which are memorised on the computer and automatically returned to the server every time the Reply Website/Platform is accessed.

There are various types of Cookies, some used to make using the Reply Website/Platform more efficient, others to enable certain functions. Cookies and the other tracking technologies can:

- memorize entered preferences;
- prevent users from having to re-enter the same information several times during their visit, for example username and password;
- analyses use of the services and contents provided by the Reply Website/Platform visited in order to optimize the browsing experience and services offered;
- allow users of the Reply Website/Platform to be recognized by third parties, i.e. Facebook, LinkedIn, Google, during the navigation on such third parties platforms in order to be informed about Reply initiatives possibly promoted on these platforms (retargeting);
- carry out anonymous or personal statistical analysis.

Types of Cookies used by the Reply Website/Platform. The types of Cookies used by the Reply Website/Platform are listed below and grouped according to the purpose for which they are used.

### Technical Cookies

Technical Cookies allows certain portions of the Reply Website/Platform to function correctly and are essential in order to allow the user to browse the Reply Website/Platform and use its features. There are two categories of technical cookies:

- *Persistent*. Once the browser has been closed these are not cancelled, but last until a predefined expiry date;
- *Session*. These are automatically cancelled each time the browser is closed.

Technical Cookies, always sent by the Reply Website/Platform, are necessary for the correct visualization of the Reply Website/Platform and, in relation to the technical services offered, will therefore always be used and sent (unless the user modifies the settings in his or her browser). Included in this category are the persistent Cookies used to allow the user to register with the Reply Website/Platform and access Reply Website/Platform restricted area.

The aforementioned Cookies used by the Reply Website/Platform avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the users' navigation of the Reply Website/Platform, and do not permit the acquisition of identifying personal information regarding the user.

When registered users log in to the Reply Website/Platform they are tracked to provide the correct access and browsing in the Reply Website/Platform section dedicated to registered users.

### Functionality Cookies

Functionality cookies are used to memorize certain settings selected by the user, in order to remember their preferences during future visits.

Functionality cookies can have the duration of a session but they are generally persistent and sent from the Reply Website/Platform. They may also be used when providing a service not explicitly requested

by, but provided to the user.

The information gathered by these cookies is anonymous and cannot track the user's behaviour outside the Reply Website/Platform.

Included in this category, for example, are first-party Cookies used to memorize the user's preferences regarding the country of origin and therefore the language in which the text of the Reply Website/Platform is viewed.

### Performance Cookies

Performance cookies are used to gather information regarding use of the Reply Website/Platform.

The cookies used by Reply are based on Google Analytics solution in anonymous way in order to improve use of the Reply Website/Platform and to adapt its contents to the preferences of its visitors. This type of Cookie gathers information anonymously regarding the user's activity and how he or she arrived at the Reply Website/Platform.

In addition, the Reply Website/Platform uses Hotjar, an analytic service provided by Hotjar Ltd (for further information please refer to Hotjar [Privacy Policy](#)). Reply uses this information in order to improve the Reply Website/Platform on the basis of the feedback received from users. Hotjar works with cookies and other technology gather information about the use of mobile devices (in particular IP-address of the device, which is collected and stored in anonymous way), size of the screen, type of device, the browser, location, preferred language. Hotjar stores the information in a pseudonymous user profile.

Reply does not use this information to identify users or to combine such data with other data.

### Cookies to Integrate Products and Software Functions from Third Parties

The Reply Website/Platform may use Cookies to integrate functions developed by third parties into the pages of the Reply Website/Platform such as icons and preferences expressed on social networks (for example: LinkedIn, Facebook, Twitter) to allow users to share the contents of the Reply Website/Platform, or for the use of third party software services requested by the users (e.g. software to generate maps and other software offering additional services highlighted explicitly in the Reply Website/Platform). These Cookies are sent by third party domains and partner websites, which therefore offer their features within the pages of the Reply Website/Platform.

### Third Party Tracking Technologies for Marketing/Retargeting

The Reply Website/Platform uses third-party tracking technologies, which are installed on Reply Website/Platform users devices only if users provide their consent on the Cookie banner in the Reply Website/Platform.

In particular, some Reply webpages includes tracking pixels of third parties (for example LinkedIn, Facebook, Google) that are used to create profiles of those users providing consent as said above. Such Information within users' profile, upon their consent, are used to recognize them when they are browsing on third party social platforms and to inform them about content promoting Reply's initiatives (retargeting).

Reply's role is limited to allow the installation of such third party technologies after the users provide their consent on the Cookie banner on the Reply Website/Platform. The creation of users' profile and the retargeting of such users to Reply's contents on third parties sites and platforms are activities

performed by third parties.

Users can decide afterwards to remove the tracking technologies following the instructions provided by third parties on their websites and platforms.

Reply cannot read or use users' information collected by third-party tracking technologies.

The Third party tracking technologies for marketing/retargeting are:

- **Facebook** Pixel, a technical instrument managed by Facebook Inc. 1601 Willow Road, Menlo Park, California, 94025, USA ("**Facebook**").
- **LinkedIn** Pixel, a technical instrument managed by LinkedIn Corporation ("**LinkedIn**").
- **Google** Pixel, a technical instrument managed by Google LLC ("**Google**").

#### *User's consent to Cookies and tracking technologies*

For EU residents, according to Cookie Law (2009/136/CE Directive), the Reply Website/Platform is not obliged to request consent for first-party technical and analytical Cookies, as they are necessary in order to provide the services requested. They are therefore installed automatically by the Reply Website/Platform during the user's first visit to any page of the portal.

Consent for the use of third-party Cookies and tracking technologies is requested from Reply Website/Platform users.

Consent is requested (at the time of the first access to the Reply Website/Platform) via a pop-up banner (Cookie banner): this implies active behaviour on the part of the user, meaning that the latter can give his or her consent by clicking on the "Accept" button.

Consequently:

- by selecting "Accept" users agree to the use of third-party tracking technologies for the purposes indicated in this Cookie Policy;
- by clicking on the "Decline" button, users deny the use of third-party tracking technologies".

Moreover, the user can give his or her consent by one or more of the following means:

- via specific browser settings used to browse the pages that form the Reply Website/Platform (see "*How to manage the Cookies used by the Reply Website/Platform through browser configuration*" section);
- via modifications to the settings for the use of third party services.

Please, note that certain areas or features of the Reply Website/Platform rely on the use of Cookies, meaning that disabling Cookies could prevent the user from visualizing certain parts of the Reply Website/Platform correctly or using specific features offered by the Reply Website/Platform (e.g., authentication and access to the restricted area of the Website).

#### *How to manage the Cookies used by the Reply Website/Platform through browser configuration*

Nearly all internet browsers are set up to automatically accept Cookies. The user can modify the predefined configuration (generally set to "medium" level) and disable Cookies, selecting from the form provided (generally entitled "Privacy") the highest level of protection. In all cases, the user also has the opportunity to delete individual Cookies from his or her computer by going to "Internet Options", Tools menu and selecting the "General" form and clicking the appropriate deletion button.

The user can find further information at <http://www.allaboutcookies.org/>. To delete Cookies from the internet browser of your smartphone/tablet. You should refer to the device's user manual.

### *How to manage third party technologies via modifications to the settings when using third-party services*

The Reply Website/Platform (as indicated in the present document at the section “Third-party tracking technologies for marketing/retargeting”) may install third-party tracking technologies: third parties have their own privacy information that differs from the ones adopted by the Reply Website/Platform and which are unrelated to the latter.

Users can deny third-party tracking technologies already set on their browsers directly following the instructions in the privacy and cookies sections of the Third Parties websites/platforms (i.e., Facebook, LinkedIn, Google, Hotjar).

Users are advised to take careful note of the information and policies regarding the use of cookies produced by third parties also to be aware of any further modifications to such policies made by the Third Parties independently of Reply.

### **Additional Information for EU/EEA Residents**

Reply provides you with this Cookie Policy 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](mailto:dpo.it@reply.it)
- DPO Germany: [dpo.de@reply.de](mailto:dpo.de@reply.de)
- DPO UK: [dpo.uk@reply.com](mailto:dpo.uk@reply.com)

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 Cookie Policy pursuant to Law No. 13.709/2018 (LGPD), concerning the protection of individuals with regarding to the processing of personal 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](mailto:privacy.security.br@reply.com)

We will answer data subjects' requests within 15 (fifteen) days upon receipt.

## **Updates to This Cookie Policy**

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

## **Contact Us**

If you have any comments or questions regarding this Cookie Policy or our data handling practices, please contact us at [privacy@reply.com](mailto:privacy@reply.com). You may also send us a letter at the following address:

Reply S.p.A.  
Corso Francia n. 110  
Torino, Italy