

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, “**Regulation**”), 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 actions (e.g. registering on the Reply website or for an event/webinar). In this case, the personal data is provided by the Data Subject.

B - Data Subjects who have a business relationship with Reply and/or with any company belonging to Reply Group (hereinafter, “**Reply Group Companies**”) and may have shown interest in Reply and/or Reply Group Companies initiatives (e.g. during business meetings with Reply / Reply Group Companies employees and/or collaborators, events, conferences, etc.). In this case, the personal data may be collected from you by Reply / Reply Group Companies employees, based on your business interaction with them.

In some cases, personal data collected from the Reply website/platform (A) may be combined with personal data collected by Reply / Reply Group Companies employees (B). In such cases, the data may be used for all purposes defined below, unless and until a data subject advises Reply to stop the activities.

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.

Providing your data through these methods may include your name, email address, phone number, work place or university, job title and preferred language. You may also provide a link to your social media account.

Your personal data is collected when you fill in specific forms online and/or offline, or through similar methods. Personal data will be entered into a Customer Relationship Management (hereinafter “**CRM**”) system and processed by Reply for the following purposes:

- a) to enable you to register on the Reply websites/platforms e.g. Webinars platform and other Reply platforms) (hereinafter, “**Reply Website/Platform**”) and accessible for example via the URL www.reply.com, in the user registration online form; to use the Reply Website/Platform

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/Platform 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. The legal basis for the processing is the contractual relationship with Reply following registration to the Reply Website/Platform, pursuant to ordinary limitation periods (e.g. until you unsubscribe from the Reply Website/Platform);

- b) to enable you to take part in events organised by Reply/Reply Group Companies, 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 Reply Website/Platform (until you unsubscribe from the Reply Website/Platform);
- c) 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, 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 Reply Website/Platform or longer if necessary to pursue the above purposes.

In order to register online on the Reply Website/Platform, you should enter the required data in the specific form. It is compulsory to enter the personal data marked with an asterisk (*) to pursue the activities described above; failure to provide this data, or the partial or incorrect provision of such data will mean that you will be unable to register on the Reply Website/Platform or 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/Platform.

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 this, your personal data, entered into the CRM, may also be processed for marketing purposes, such as sending promotional and commercial communications regarding 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 provide information about our 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, via online forms on the Reply Website/Platform or by other similar methods, to provide consent for your personal data processing. Should you deny or withdraw your consent for the marketing purposes described above, your data will be processed only for the purpose 1) referred to in letter A) above.

If consent is provided and you receive an email from Reply/Reply Group Companies the following actions may be tracked (through our 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/Platform and viewing at least one of the contents.

Your personal data collected according to the above will be processed only for technical reasons, particularly 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 Reply Website/Platform.

The legal basis for the processing is based on your consent. Your personal data may be kept until consent is withdrawn.

B) Personal data, collected when you have a contact with Reply/Reply Group Companies 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 is collected through communication with Reply/Reply Group Companies employees or collaborators with whom there is a business relationship with and your data is then entered into the Reply CRM database by Reply/Reply Group Companies authorized staff where you've expressed an interest in our initiatives, services or products (e.g. during business meetings, events, conferences, etc.).

We may keep such data including your name, email address, telephone number, job title, department, as well as any projects and initiatives you may be associated with when engaging with Reply/Reply Group Companies.

Unless and until you advise us otherwise, your personal data may be processed for marketing purposes, such as sending promotional and commercial communications regarding products and services offered by Reply or by the Reply Group Companies, to provide information about Reply events, webinars and further services, 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/Platform and viewing at least one of the contents.

Your personal data according to the above will be processed only for technical reasons particularly 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 Reply Website/Platform.

The legal ground for the processing is the legitimate interest of Reply to perform promotional activities related to its products and services.

Moreover, unless and until you advise us otherwise, your personal data can be processed by Reply for recommending you contents of your interest, identified by Reply also through automated processing, including profiling, and performing customized marketing actions with the support of automated tools (e.g. SMS, MMS, fax, e-mails etc.) and online.

Automated processing and, in particular, profiling for customized marketing actions as above described is carried out using similarity techniques based on multiple selection criteria (e.g. information such as company, industry of business, job position provided by you may be combined with information on products and services, such as your participation to events / webinars, purchased and/or required, both online and/or offline; such information is not collected through online cookies). Finally, the recommendation is carried out using machine learning algorithms and automated ways of personal data segmentation.

The legal ground for the automated processing and, in particular, the profiling is the legitimate interest of Reply related to customized marketing actions performed by Reply.

Reply may process your data for marketing purposes, as described above, for the duration of our business relationship with you and in any case until you oppose to such processing activities.

With regard to the cookies used by the Reply Website/Platform, please refer to the Privacy Policy, available online in the footer of the Reply Website/Platform.

C) Processing method

Processing activities on your data may be performed by Reply/Reply Group Companies either manually or through electronic procedures, alongside automated processing, according to the purposes indicated above and for the time strictly necessary to pursue these purposes; as well as, in any case, protecting 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 as applicable and depending on the state of the art.

D) The right to access personal data and other rights

You have the right to request access to or update your personal data, oppose or limit the processing of your data or request the deletion of your data, ask for further information on the processing performed by Reply, as well as exercise the right to data portability.

You also have the right to withdraw your consent at any time without prejudice to the lawfulness of the processing or oppose to processing your data based on legitimate interest.

Such rights may be exercised in writing by mail to: Reply S.p.A., Corso Francia 110, Torino or by emailing privacy@reply.com for the Reply Website (reply.com) and by emailing webinar@reply.com for the Reply Webinars Platform (webinars.reply.com).

The right to opt-out of or oppose to the use of data processing for marketing purposes by Reply may be fulfilled by clicking on the '*unsubscribe*' link provided at the bottom of such emails.

If you would like to oppose to the profiling of your data for (customized) marketing purposes by Reply, you may email privacy.recommendation@reply.com.

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

E) Sharing your data with Third Parties

In addition to Reply employees, your personal data may be processed, on behalf of Reply, as data processors or persons in charge of the processing, as the case may be, by respectively Reply Group Companies or their employees, in Italy and/or abroad, and by third parties (individuals or legal entities, appointed by Reply to perform technical interventions, repairs, routine and maintenance, Reply Website/Platform 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 responsible to inform you regarding their own purposes and to may request your consent, if necessary.

When you attend any Reply Webinars available on the Reply Website/Platform, such webinars may be hosted on different external platforms specified for each webinar. For more information on how

the specific platforms Providers use and protect your data, please refer to their privacy policy listed below:

- Zoom Webinars: available on www.zoom.us
- Teams: available on www.microsoft.com
- Google Meet: available on meet.google.com

Your personal data may also be shared with the Data Protection Authority and other public bodies where necessary, usually upon request which is a legal obligation.

Your data will not be shared with anyone else, besides the above.

F) Extra-EU Data transfer

Your personal data may be processed outside of the EU, particularly in the countries where Reply Group Companies are based (see the section Office Locations & Contacts on www.reply.com), for the purposes specified in this Notice. Reply ensures that your data is safe and secure throughout any transfer, as provided by the Regulation and any applicable data protection laws.

For further information you may contact Reply as described at the letter D).

G) Data Controller and Data Protection Officer (DPO)

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.

The relevant DPOs contacts are:

- DPO Italy: dpo.it@reply.it
- DPO Germany: dpo.de@reply.de
- DPO UK: dpo.uk@reply.com