

Reply S.p.A. Webinars platform Privacy Policy

This page provides an outline of the way personal data of Reply Webinars platform visitors is managed. This notice is provided pursuant to Section 13 of EU Regulation no. 679/2016. This notice is addressed to all who interact via the web services provided by Reply, accessed by electronic telecommunications means through the address: webinars.reply.com. This notice only applies to the Reply S.p.A. Webinars platform (hereinafter “**Reply platform**”).

Data controller and Data Protection Officer (DPO)

When identified or identifiable users access this Reply platform, personal data of the said users may be processed.

The data controller is Reply S.p.A. (registered office: Corso Francia 110, Torino).

Data is processed exclusively by Reply staff entrusted with this task. No personal data generated by the web service is transferred to third parties. Personal data provided by users are used for the sole purposes of providing requested services and performing the tasks requested. This information is transferred to third parties only when necessary in furtherance of these interests.

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

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

Types of processed data

Navigation data

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

This information 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 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 (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 statistical information relative to use of the Reply platform and for control of correct functioning of the said Reply platform in order to optimize its functionality in relation to the offered services.

Please note that the said data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the Reply platform.

If no such investigations are conducted, the data relative to web contacts is destroyed in a few days.

Data provided voluntarily by user

When e-mail messages are voluntarily sent to the addresses indicated in the address section of Reply 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 platform uses "cookie" technology. For information regarding the Cookies used by the Reply 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 employees and collaborators by means of automated and non-automated equipment. It 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 in the aforementioned sections 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 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.

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

Requests of this nature are to be addressed to e-mail address webinar@reply.com sent to Reply S.p.A. - Corso Francia n. 110 - 10143 Torino.

Minors

Reply does not knowingly use its Reply platform to request data from minors or persons of less than 18 years of age.

Cookie Policy

The Reply platform uses Cookies to make its services simple and effective for users visiting the portal page.

Cookies are text files, or parcels of information sent from a web server (the Reply platform webinars.reply.com) to the user's browser, which are memorized on the computer and automatically returned to the server every time the Reply platform is accessed.

There are various types of Cookie, some used to make using the Reply platform more efficient, others to enable certain functions. For example, Cookies can:

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

Types of Cookies used by the Reply Webinars platform

The types of Cookies used by the Reply platform are listed below, grouped according to their reasons for use.

Technical Cookies

This type of Cookie allows certain sections of the Reply platform to function correctly and are essential in order to allow the user to browse the Reply 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 pre-defined expiry date;
- session: these are automatically cancelled each time the browser is closed.

These Cookies, always sent by the "reply.com" domain, are necessary for the correct visualisation of the Reply 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 platform and access its restricted area.

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

Functionality Cookies

The Cookies in this category are used to memorize certain settings selected by the user, in order to remember their preferences during future visits.

These Cookies can have the duration of a session but they are generally persistent and sent from the "reply.com" domain. 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 behavior on other websites.

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 platform is viewed.

Performance Cookies

The cookies in this category (which also include so-called "Cookie analytics") are used to gather information regarding use of the Reply platform.

Reply platform uses Brightcove to track the use of the video player on the Reply platform (for further information about Brightcove and privacy policy, please refer to Brightcove [Privacy Policy](#)).

Included in this category, there are Google Analytics where the personal data collected (user data) with anonymized IPs is used for the purpose of tracking visitor behavior, measuring site performance and calculating new and returning visitor statistics (for further information please refer to the following Privacy Policy: <http://www.google.com/intl/en/policies/privacy/>).

Reply uses this information in order to collect anonymous statistics and improve Reply platform experience.

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

This type of Cookie integrates functions developed by third parties into the pages of the Reply platform such as icons and preferences expressed on social networks (for example: Facebook, Twitter) in order to share the contents of the Reply platform or for the use of third party software services (such as software to generate maps and other software offering additional services). These Cookies are sent by third party domains and partner websites, which therefore offer their features within the pages of the Reply platform.

Third party tracking technologies for marketing / retargeting

The Reply platform uses only third-party tracking technologies which are installed on users' PCs only if users provide their consent.

In particular, some Reply webpages include tracking pixels of third parties (Facebook, LinkedIn, Google) that are used to create user profiles of those users providing consent only (through the banner at the footer of the webpage). Information within users' profile 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 Reply's platform. The real creation of the users' profile and the retargeting of such users to Reply's contents on third parties sites and platforms are performed by third parties.

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

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

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

For further information please refer to the [Privacy section](#) and [Cookie section](#) of Facebook

website.

Facebook has adhered to the "Privacy Shield" agreement which is in compliance with European data protection laws and regulations (<https://it-it.facebook.com/about/privacysshield>);

- b) **LinkedIn** Pixel, a technical instrument managed by LinkedIn Corporation ("LinkedIn").

For further information please refer to the [Privacy section](#) and [Cookie section](#) of the LinkedIn website.

LinkedIn has adhered to the "Privacy Shield" agreement which is in compliance with European data protection laws and regulations (https://www.privacysshield.gov/participant?id=a2zt0000000L0UZAA0&status=Active\t_blank);

- c) **Google** Pixel, a technical instrument managed by Google LLC ("Google").

For further information please refer to the [Privacy section](#) of the Google website.

Google has adhere to the "Privacy Shield" agreement which is in compliance with European data protection laws and regulations

(<https://www.privacysshield.gov/participant?id=a2zt000000001L5AAI>).

The user's consent

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

For other types of third-party Cookies and tracking technologies, consent is requested (at the time of the first access to the Reply platform) via a pop-up 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 Privacy Policy;
- by clicking on the "Decline" button, users deny the use of third-party tracking technologies".

For all other types of tracking technologies, 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 Website platform (see the following section);
- via modifications to the settings for the use of third party services.

Please note that certain areas or features of the Reply platform rely on the use of Cookies, meaning that disabling Cookies using one of the solutions indicated above could prevent the user from visualising certain parts of the Reply platform correctly or using specific features offered by the Reply platform.

How to manage the Cookies used by the Reply Webinars 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" or similar entries, 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

Reply 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 platform and which are unrelated to the latter.

Users can deny third-party tracking technologies already set on their browsers directly through the following links to the websites of the involved Third-parties:

- [Facebook](#)
- [LinkedIn](#)
- [Google](#)

Users are advised to take careful note of the information and policies regarding the use of cookies produced by third parties and as stated above also in order to be aware of any modifications made to them by the various suppliers independently of Reply.

This document will be updated by Reply if necessary in order to inform platform visitors about the processing activities carried out and the updated version is available on the Reply platform.