

Reply AI Film Festival Privacy Notice

Reply S.p.A., with registered office in Turin, Corso Francia, 110 – Tax ID: 9757921001 and VAT number: 08013390011, (“Reply,” “we,” or “us”) respects your privacy and is committed to protecting it through our compliance with this Privacy Notice (“Privacy Notice”).

This Privacy Notice sets forth our policy with respect to information, including personally identifiable information (“Personal Data”), that is collected from users (“you” or “your”) who have independently and freely decided to submit their video contents (“Short Films”) to the Reply AI Film Festival via the FilmFreeway website (“FilmFreeway”).

The Reply AI Film Festival is a creative competition focused on AI-based video-making organized by Reply S.p.A. with the contribution of Mastercard Europe SA, main sponsor of BIENNALE CINEMA 2025 - 82ND VENICE INTERNATIONAL FILM FESTIVAL.

Your participation to the Reply AI Film Festival is regulated by your acceptance of the **Reply AI Film Festival Terms & Conditions** through FilmFreeway (“Reply T&Cs”).

The Short Films selected as finalists will be screened during the dedicated event hosted by Reply and Mastercard that will take place in date between September 1st, 2025, and September 6th, 2025, in Venice.

When you submit to the Reply AI Film Festival through FilmFreeway, you consent to FilmFreeway providing your Personal Data to us according to FilmFreeway terms and conditions that you have accepted. Reply will process your personal data as per this Privacy Notice, in compliance with applicable legislation. FilmFreeway will process your Personal Data in accordance with its Privacy Policy. It is important that you review the applicable policies of FilmFreeway before providing Personal Data or other information. You agree that we are not responsible for the actions of FilmFreeway with respect to your Personal Data.

We encourage you to read this Privacy Notice carefully and to frequently consult this document, in order to know the possible variations or modifications that could be made to it, to reflect changes in our practices with respect to the processing of your information, or changes in applicable law.

1. Data collection

We collect Personal Data from you when you voluntarily submit to the Reply AI Film Festival through FilmFreeway. The Personal Data we may collect include:

- data provided directly by FilmFreeway following your submission such as your name, address, email address, zip code;
- any data (e.g. images) included in the Short Films.

We generally do not seek information that may be considered “special” or “sensitive” personal data (e.g., government-issued identification numbers or information related to your racial or ethnic origin, political opinions, religious or other beliefs, health, criminal background, or trade union membership), and we ask that you do not provide such information.

2. Purposes, Legal basis and Data Security

We use the Personal Data we collect in a manner that is consistent with this Privacy Notice. We may use the Personal Data as follows:

- allow you to join the Reply AI Film Festival that takes place in accordance with the Reply T&Cs;
- allow you to request support during the production of a Short Video;
- update you, including by e-mail, regarding the Reply AI Film Festival.

The legal basis for such processing activities is the acceptance of the Reply T&Cs.

In any case, Personal Data may also be processed to comply with applicable laws, regulations, and legislation, as well as to comply with orders issued by authorities that are lawfully permitted to do so, including with respect to the prevention and detection of information technology offenses, as well as to manage any complaints or disputes. The legal basis for using the personal information you provide us for this purpose is compliance with the aforementioned laws, regulations, legislation, and/or orders.

For the purposes above described, we may electronically and/or manually process your personal information. We make use of reasonable technical and organizational security measures and safeguards that are designed to help protect the data that we collect, use, and retain.

3. Communication and dissemination of personal data

In connection with the purposes outlined in the section 2 above, we may disclose your information to:

- employees of the Reply Group appointed as persons in charge of the processing and/or system administrators who provide Reply with support activities in the organization and management of all the obligations related to the management of the Reply AI Film Festival;
- companies or individuals involved in the Reply AI Film Festival, companies or professional firms that provide Reply with assistance or advice in accounting, administrative, legal, tax and financial matters relating to the Reply AI Film Festival, etc.
- committee composed of one or more technical experts in Artificial Intelligence and AI tools, one or more professionals working in the cinema industry (such as directors, screenwriters, and producers, and one or more film critics and experts), who will select the winner of the Reply AI Film Festival.

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

4. Data retention periods and additional information

Personal Data will be retained for the period defined by the reference legislation (five-year or ten-year terms for the conservation of documents and related data of a civil, accounting and tax nature as required by the current laws) and for the period necessary to perform the services related to the Reply AI Film Festival or lower term, if the Data Controller receives from the Data Subject a revocation of consent and/or request for erasure (provided that, in case of request for erasure, will be less, for the person concerned, the ability to join the Reply AI Film Festival).

All data collected will not be subject to any automated decision-making process, including profiling.

5. Extra EU/UK Data Transfer

Reply is a global corporation with operations in several countries (a list of the Reply offices is available [here](#)) and for the purposes listed above personal information may be accessed by Reply authorized persons including in countries or regions outside of the one in which you reside.

6. Exercise of rights

Depending on Data Subject's country of residence, Data Subject may have certain choices and rights in relation to him/her information.

EU/UK Data Subjects can ask to Data Controller the access to data concerning them, rectification of inaccurate data or integration of incomplete data, erasure of data, restriction of processing activity in the cases provided by art.18 GDPR; to receive data in a structured, commonly used and machine readable format, as well as, if technically possible, to transmit data to other data controller without hindrance, in the cases in which the conditions for the exercise of data portability right are present, according to art. 20 GDPR (processing is based on the consent pursuant to art. 6.1 lett. a) or art. 9.2 lett. a) or on a contract pursuant to point (b) of art 6.1 GDPR or in the case in which processing is carried out by automated means). Data subjects have the right to object, for reasons connected to their particular situation, the processing activity for pursuing the purposes based on the legitimate interest of the Data Controller.

The EU/UK Data Subjects have also the right to lodge a complaint with the Data Protection Authority of the country of residence.

Any corrections or cancellations or limitations of the processing performed at the request of the Data Subjects, except in cases where this proves impossible or involves a manifestly disproportionate means, will be communicated by the Data Controller to each of the recipients to whom the personal data was transmitted. The Data Controller of the information may inform the recipient of these recipients on request. The exercise of these rights is not subject to any form constraint and is free of charge.

To exercise the rights you can email us at aiff@reply.com.

7. Children:

Reply AI Film Festival is opened to participants aged 18 years. We do not knowingly collect Personal Data from under age individuals.

8. Data Controller and Data Protection Officer

Reply acts as autonomous Data Controller with regard to the processing of your Personal Data for the purposes described in the above section 2.

If you have questions or concerns about our collection or use of your Personal Data, you can contact our Data Protection Officers (DPO) at:

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