

## Reply Challenges website Privacy and Cookies Policy

This Privacy Policy (hereafter referred to as "**Policy**") provides information on how Reply may process Reply Challenges platform visitors personal data. This Policy is provided according to Section 13 of EU Regulation no. 679/2016 (hereinafter referred to as "**Regulation**"). This Policy is addressed to all those who interact through the web services provided by Reply, accessed by electronic telecommunications means through the address: <https://challenges.reply.com> (hereafter referred to as "**Website**").

It is strongly recommended that the user (hereafter referred to as "**User**") frequently consults this document, in order to know the possible variations or modifications that could be made to it, mainly due to regulatory changes.

By accessing the Website, the User declares and acknowledges that he/she is aware of the terms and conditions of this Privacy Policy and of any subsequent changes to it.

Please also note that any third-party websites referred to by means of links on the Website are governed by their own privacy policies which are out of scope.

### 1. Data Controller

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

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

### 2. Types of processed data and collection method and storage period

#### *Navigation data*

IT systems and software procedures adopted for the functioning of this Website, as 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 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 Website 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 relating to operating system and to User's IT environment. This data is only to be used for anonymous aggregated statistical related to use of Website and for control of correct functioning of the Website in order to optimize its functionality in relation to the offered services.

Please note that the said information may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the Website or any linked websites. 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 Challenges Website, 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).

The data processed are those collected at the same time:

- (i) the compiling of the forms published on the initial page and / or on internal pages of the Website aimed at creating a personal account;
- (ii) the request for information, including on the services offered through the Website and / or any requests for assistance or support sent by the User via email or through the tools referred to in the Website itself.

#### *Cookies*

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

### 3. Purposes and procedures involved in the processing

The user data will be processed by Reply for the purposes and with the legal basis indicated below:

- a) **To enable users to contact Reply:** to manage and handle the requests submitted, in each instance, by the User through the Website and/or by e-mail and/or via any other means of communication;
- b) **To allow Reply to comply with legal obligations:** to comply with obligations set forth in laws, regulations and by Community legislation, as well as by provisions issued by authorities authorized to do so by law or by supervisory and inspection authorities, also for the prevention and investigation of computer-related crimes;
- c) **To allow Reply to pursue its legitimate interest:** for the legal defense of a right or interest before any competent authority or institution. This also includes the processing of browsing data for the purpose of preventing fraud committed through use of the Website and for the protection of the related rights and interests of the Data Controller also before the law.

In relation to the purposes stated above, the data processing shall be carried out using manual, computerized and telematic tools, by specifically appointed individuals "in charge of processing", with logic strictly related to the purposes in question and for the time strictly necessary for the achievement of the same, as well as with the intent to protect, where applicable and in accordance with the latest technologies, the security and confidentiality of the same data, using appropriate procedures that eliminate the risk of loss, unauthorized access, improper use and dissemination of the data.

### 4. Provision of Data – mandatory or optional nature

The User is advised that the provision of data is necessary for all the purposes indicated in paragraph 3, with the result that, in these cases, any refusal to provide data will mean that it will be impossible to process the User's specific requests.

Some other optional data are provided by the User directly or indirectly (in the latter case, through the third party website technologies, as indicated in the present document in the section "Third party cookies for advertising/marketing/retargeting").

### 5. Subjects - Data disclosure

For the purposes described in paragraph 3 above, personal data may be disclosed to third parties that include, but are not limited to, third parties operating on behalf of the Data Controller:

- to subjects, individuals and/or legal persons, entrusted by the Data Controller to carry out technical work related to the repair, ordinary and extraordinary maintenance, restoration and upgrade of the Website;
- to other specific Reply Group Companies as necessary to fulfil the service;
- to persons authorised by the Data Controller to process the personal data required in order to perform activities closely related to the supply of services, who have made a commitment to confidentiality or have an appropriate legal obligation of confidentiality (e.g. employees of the Data Controller);

The data shall not, in any case, be subject to distribution.

### 6. Underage People

Reply does not knowingly use its Platform to request and process data from under age individuals (users under 14 years old in Italy, under 13 years old in the UK), according to privacy law and further laws and regulations applicable in their country of residence.

### 7. Rights of the Data Subject

The individuals referred to by personal data collected by the Website 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, i.e. registered users, 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 emailed to e-mail address [challenges@reply.com](mailto:challenges@reply.com).

## 8. Cookie Policy

The Reply Challenges Website uses Cookies and other tracking technologies (e.g. pixels, Conversions API, Google Analytics) to make its services simple and effective for visitors and registered users accessing the platform contents visible only to them.

Cookies are text files, or parcels of information sent from a Website to the user's browser, which are memorized on the computer and automatically returned to the server every time the website is accessed.

There are various types of Cookie, some used to make using the Website 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;
- analyze use of the services and contents provided by the Website visited in order to optimize the browsing experience and services offered;
- allow visitors of the Reply Website to be recognized by third parties i.e. Google, Meta, LinkedIn during the navigation on such third-parties platforms in order to be informed about initiatives of Reply and/or any selected Reply business partners possibly promoted on these platforms (retargeting);
- create custom audiences for retargeting purpose, optimize campaign results (i.e. automatically understand which type of uses is more likely to register to the platform) and aggregate results for statistical purpose (i.e. plan future campaigns);
- carry out anonymous statistical analysis.

### *Types of Cookies used by the Website*

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

#### Technical Cookies

This type of Cookie allows certain sections of the Website to function correctly and are essential in order to allow the User to browse the Website 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 Website, are necessary for the correct visualization of the Website 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 Website and access its restricted area.

#### **COOKIE NAME**

#### **COOKIE DESCRIPTION**

JSESSIONID

The cookie is issued by the application server to identify the user's session whether the same or not authenticated

\_shibsession\_\*

The cookie is issued by the application server to identify the user's session whether the same or not authenticated (only for Reply users)

enactingToken

Protects the application and the user from CSRF attacks

2d9a789f21fe35a2cf1ddeedb1bb3fdf	It manages the “remember me” mechanism so that an already authenticated user does not have to re-enter the credentials
a5146b5ece1cefd07c1dbc2d08f2d	It manages the “remember me” mechanism so that an already authenticated user does not have to re-enter the credentials
tt_cookie_policy_accepted	Trace or not the acceptance of the cookie policy by the user
tt_cookie_policy_declined	Trace or not the acceptance of the cookie policy by the user
teamUpCode	Contains the identification data (all encrypted) of the invitation to join a team (e.g. team, challenge, userId that generated the invitation)
agreementJoinTeam	It states whether the user has expressed a willingness to join the team within the invitation flow
acceptedClauses	It keeps track of which clauses have been accepted within the invitation flow
latestVisitedCategory	Tracks which is the latest category page visited by the user (CODING,INVESTMENT..)
challenge_<id>_private	Tracks if the user expanded the challenge <id> private description
referralUrlSecret	Tracks the unique identifier of the referral url the user has clicked, if any
referralCode	Tracks the unique identifier of the user which generated the referral url the user in session has clicked, if any
referralUser	Tracks the screen name of the user which generated the referral url the user in session has clicked, if any

The aforementioned Cookies used by the Website avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the users' navigation of the Website, 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 Website. 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 outside the Website.

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 Website is viewed.

## Performance Cookies

The cookies in this category are used to gather information regarding use of the Website.

The Website uses Google Analytics in anonymous way in order to improve use of the Website and to adapt its contents to the preferences of its visitors.

In addition, the Website uses Hotjar, an analytic service provided by Hotjar Ltd (for further information please refer to Hotjar Privacy Policy) in order to improve the Reply Website 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 anonymized), 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

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

## Third party cookies for advertising/marketing/retargeting

### ***Tracking pixels of third parties:***

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

In particular, the Website includes tracking pixels of third parties (i.e. Meta, LinkedIn, Google which act as autonomous Data Controllers) that are used to create user profiles of those users providing consent as said below. 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 initiatives of Reply and any selected Reply business partners (retargeting purposes).

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 Website. The creation of the users' profile and the retargeting of such users to contents of Reply and any selected Reply business partners 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 pixels are:

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

Upon user consent, the Website may include Meta and Google tracking pixels/tags of the following selected Reply business partners for their own retargeting purposes as autonomous Data Controllers:

- YOUNG PLATFORM S.p.A. with registered office in Turin (TO), Via Cigna 96/17 (Tax Code and VAT no. 11931440017), in accordance with [Young Platform Privacy Policy](#).

### ***Meta Conversions API:***

The Website uses Meta Conversions API ("Conversions API"), a Meta Business Tool that lets to share - upon user consent eventually given on the Cookie banner in the Website – user's selected event data (see below) directly from Reply server to Meta's.

FB Conversions API works with the abovementioned Meta tracking pixels to help improve the performance and measurement of Reply Meta ad campaigns.

Reply uses FB Conversions API to create custom audiences for retargeting purposes, optimize Reply Meta ad campaigns results (i.e. automatically understand which type of users is more likely to register to the Website) and aggregate results for statistical purpose (i.e. plan future campaigns).

In particular, upon user consent and whenever the user decides to access the Website after having logged in through his/her Facebook account, Reply transfers to Meta some of user personal information (e.g. name, surname, email, date of birth, country, External ID) to create custom audiences for retargeting purposes. Meta may process such user data received from Reply for its own purposes as autonomous Data Controller (for further information please refer to Meta Privacy Policies).

For user logged in to the Website without Facebook account, Reply transfers to Meta only the External ID for anonymous statistical purposes to avoid duplicates.

This label is meaningless for Meta that has no means to know the identity of the user through the External ID. For the same purpose, the External ID is sent to Meta also in case the user does not give his/her consent.

#### *Registered user's consent to Cookies and tracking technologies*

According to Cookie Law (2009/136/CE Directive), the Website 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 automatically installed by the Website 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 via a pop-up banner: this implies user's active behavior by:

- selecting "Accept All Cookies", users agree to the use of third-party tracking technologies for the purposes indicated in this Privacy Policy;
- clicking on "Manage your preferences", users may choose to accept the third-party tracking technologies or not.

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 Website (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 Website rely on the use of Cookies, meaning that disabling Cookies using one of the solutions indicated above could prevent the user from visualizing certain parts of the Website correctly or using specific features offered by the Website (for example authentication and access to the restricted area of the website).

#### *How to manage the Cookies used by the Website 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 Website (as indicated in the present document at the section "Third party cookies for advertising/marketing/retargeting") may install third-party tracking technologies: third parties have their own privacy information that differs from the ones adopted by the Website 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 (Google Analytics, Facebook, Twitter, LinkedIn, Adnxs, Hotjar).

## 9. Data Protection Officer (DPO)

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

- 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)

This document will be updated at Reply discretion and whenever necessary in order to inform about the modalities and purposes of the processing. The updated version will promptly be made available by Reply.