

## Reply Challenges website Privacy Policy

This page provides an outline of the way personal data of visitors to the Reply Challenges website are managed. This notice is provided according to Section 13 of EU Regulation no. 679/2016 (hereinafter referred to as "Regulation"). This notice 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 (hereafter referred to as "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 a separate privacy policies which are out of scope.

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

#### *Navigation data*

The information systems and software used in order to operate this Website acquire personal data as part of their normal operation. The transmission of such data is implicit in the use of the Internet, based on the TCP/IP communication protocol.

This information is not collected in order to associate it to identified individuals. However, by its very nature, through processing and association with data held by third parties, the information could allow the identification of users.

This data category includes the "IP addresses" or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the resources requested, the request timestamps, the method used to send the request to the web server, the size of the file received in response, the numeric code indicating the response status from the web server (successful, error, etc.) and other parameters relating to the User's operating system and technical environment. This data is used exclusively to obtain anonymous statistical information on website usage and to verify the correct operation of the Website. It should be noted that this data could be used to ascertain responsibility in the case of computer crimes against the Website or other connected websites: with this exception, at present, web contracts data is not retained for more than 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 (hereafter referred to as "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.

## 2. Data Controller and Data Protection Officer (DPO)

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. 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 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)

## 3. Legal basis, 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:

- 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;
- 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 authorised to do so by law or by supervisory and inspection authorities, also for the prevention and investigation of computer-related crimes;
- To allow Reply to pursue its legitimate interest:** for the legal defence 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, computerised 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, unauthorised 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 tracking technologies for 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 complete and updated list of subjects appointed as data processors may be requested from the Data Controller.

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

## 6. Underage People

The Website does not contain information, functions or services aimed specifically at underage people (users under 14 years old in Italy, under 13 years old in the UK).

## 7. Rights of the Data Subject

The Data Controller supports the User to enforce his/her rights at any time, as applicable:

- a) to access their data and request rectification, i.e. that they are corrected, modified or integrated, and to receive a copy of the personal data;
- b) to withdraw consent at any time. In any case, the withdrawal of consent shall only be valid for the future and shall not have any effect on processing that took place prior to withdrawal.
- c) to object to the processing of data based on a legitimate interest of the Data Controller, unless the latter demonstrates legitimate reasons to continue with the processing that prevail over the User's interests, rights and fundamental freedoms, or for the verification, exercise or defence of a right in judicial proceedings;
- d) to delete the data in cases envisaged by applicable legislation. This right shall not apply if the data processing is necessary, among other things, to fulfil a legal obligation or for the verification, exercise or legal defence of a right.
- e) to request that the processing of your personal data be temporarily restricted, which means that data processing shall be suspended for a certain period of time. The circumstances that may provide the basis for this right include situations in which the accuracy of the personal data has been contested, but some time is necessary to verify its accuracy. This right shall not prevent the continuation of the personal data processing.
- f) to request that the data is made available to the User and transferred to another Data Controller in a structured format of common use and legible by an automatic device ("data portability") or, where technically feasible, is transferred directly to another data controller. This right shall apply in the case of automatic data processing that is based on the User's consent or on the implementation of contractual obligations.

Lastly, the User has the right, where he/she believes that the processing of his/her personal data has been carried out illegitimately, to submit a complaint to one of the competent supervisory authorities for compliance with personal data protection legislation. In Italy, the complaint may be submitted to the Data Protection Authority (more information is available on <http://www.garanteprivacy.it>).

All requests should be emailed to e-mail address [challenges@reply.com](mailto:challenges@reply.com) or sent to Reply S.p.A. – Corso Francia n. 110 - 10143 Turin.

## 8. Cookie Policy

The Reply Challenges Website 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 website <https://challenges.reply.com>) 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.

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 website visited in order to optimise the browsing experience and services offered.
- allow visitors of the Reply websites to be recognized by third parties (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 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 domain, are necessary for the correct visualisation 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

ttpass

It manages the "remember me" mechanism so that an already authenticated user does not have to re-enter the credentials

ttuser

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

The so-called session cookies used by this Website make it unnecessary to implement other computer techniques that are potentially detrimental to the confidentiality of user navigation, whilst they do not allow acquiring the User's personal identification data.

### **Analytical Cookies**

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

The Website uses this information to obtain anonymous statistical analyses in order to improve use of its Website and to adapt its contents to the desires of its visitors. This type of Cookie gathers information anonymously regarding the user's activity and how he or she arrived at the Website.

Reply website 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 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.

Included in this category, for example, are Web Analytics, where the data gathered is limited to use of the website by the user and the number of accesses to the website, in order to manage the performance and structure of the website. These cookies are generally persistent.

### **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 Website such as icons and preferences expressed on social networks (for example, Google, LinkedIn, Facebook, Twitter) in order to share the contents of the Website 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 Website.

### **Third party cookies for advertising/marketing/retargeting**

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

In particular, Reply website include tracking pixels of third parties (e.g. Facebook, LinkedIn, Google) that are used to create user profiles of those users providing consent only (through the banner at the footer of the website). 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 website. 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/privacysield>);

- b) 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 (
- 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.privacyshield.gov/participant?id=a2zt000000001L5AAI>).

These third-party tracking technologies are:

COOKIE NAME	COOKIE DOMAIN
_bizo_bzid	challenges.reply.com
_bizo_cksm	challenges.reply.com
_bizo_np_stats	challenges.reply.com
uuid2	adnxs.com
sess	adnxs.com
anj	adnxs.com
fr	facebook.com
BizoData	ads.linkedin.com
BizoID	ads.linkedin.com
BizoUserMatchHistory	ads.linkedin.com
IDE	doubleclick.net
bcookie	www.linkedin.com
bscookie	www.linkedin.com
lang	ads.linkedin.com
lidc	www.linkedin.com
hotjar	hotjar.com

## The user's consent

According to Cookie Law (2009/136/CE Directive) and to Italian Data Protection Authority regulation, the Reply Challenges 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 Cookie and tracking technologies, consent is requested via a pop-up banner: this implies user's active behavior 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 (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 Reply Challenges 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.

More detailed instructions for managing Cookies on the part of the user for the more common browsers are below. 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.

### Chrome

Click on the ("Settings") menu in the browser's toolbar next to the window for inserting the url when browsing. Select "Settings".

Click on "Show Advanced Settings" at the end of the list.

In the "Privacy" section click on the "Contents settings" button.

In the "Cookie" section it is possible to modify the following settings regarding Cookies:

Allow local data to be set

Keep local data only until you quit your browser

Block sites from setting any data

Block third-party cookies and site data

Manage exceptions for certain websites

Delete some or all Cookies

### Mozilla Firefox

Click on the ("Settings") menu in the browser's toolbar next to the window for inserting the url when browsing.

Select "Options"

Select the "Privacy" panel

In the "Tracking" section it is possible to modify the following settings regarding Cookies:

Tell sites that I do not want to be tracked

In the "History" section it is possible:

By enabling "Use custom settings for history" choose to accept third party Cookies (always, from the most visited sites or never) and to conserve them for a determined period of time (until they expire, until I close Firefox or ask me every time)

Remove individual stored Cookies

### Internet Explorer

Click on the "Tools" button and select "Internet Options"

Click on the "Privacy" tab and in the "Settings" section, move the slider to the desired action for Cookies:

Block all Cookies

Allow all Cookies

Selecting which sites to allow Cookies from: move the cursor to an intermediate position in order neither to block nor allow all Cookies, then click on "Sites", in the "Website address" insert a website then press "Block" or "Allow"

### Safari

Click on Safari, select Preferences and click on Privacy  
In the Block Cookies section specify how Safari must accept Cookies from websites.  
To view which websites have stored Cookies click on Details  
In all cases, the User is advised to check his or her browser settings from time to time.

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

With regard to third-party cookies used by the Website, the third parties have their own privacy policy which is different from that adopted by the Website and for which the latter is unrelated and does not respond.

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:

Google Analytics: <http://www.google.it/analytics> e  
[https://www.google.com/intl/it\\_it/policies/technologies/cookies/](https://www.google.com/intl/it_it/policies/technologies/cookies/)

Facebook: <https://www.facebook.com/help/cookies/>

Twitter: <https://twitter.com/privacy?lang=en>

LinkedIn: <https://www.linkedin.com/legal/cookie-table>

Adnxs: <https://www.appnexus.com/en/company/cookie-policy>

Hotjar: <https://www.hotjar.com/privacy/gdpr-compliance>

It's recommend to the users to carefully read the information and policies relating to the use of cookies produced by third parties and as mentioned above also in order to be aware of any changes made to them by the respective suppliers and independent to Reply.

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 is available on the Reply website.