

## Reply Online Services Privacy and Cookie Policy

Reply S.p.A. (“**Reply**,” “**we**,” or “**us**”) respects user privacy and is committed to protecting it through our compliance with this Reply Online Services Privacy and Cookie Policy (“**Cookie Policy**”). This Cookie Policy describes the information we collect and process related to our Reply Online Services platform (the “ROSE Platform”) using automated data collection technologies, and what choices the User has with respect to the information.

This Cookie Policy generally applies to registered users of the ROSE Platform as well as those who visit the ROSE Platform (the “**User**”). On top of general information, specific integrations are provided in this Cookie Policy for EU/UK/Swiss residents, Brazil residents and US residents.

The Portuguese version of this document is available [here](#).

### Data Controller or Covered Business

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

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

### Types of Processed Data

#### Navigation data

IT systems and software procedures adopted for the functioning of the ROSE Platform, as a part of their normal functioning, collect various items of personal data. This 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 ROSE 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 (e.g., 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 aggregated statistical information relative to use of the ROSE Platform and for control of correct functioning of the ROSE Platform in order to optimize its functionality in relation to the offered services.

Please note that navigation data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the Platform or any linked website. If no such investigations are conducted, the data relative to web contacts is destroyed within a few days.

#### Data provided voluntarily by User

In the registration form, visitors may provide requested personal data in order to submit their registration. Moreover, in the ROSE Platform section dedicated to registered Users some further data will be collected by the ROSE Platform during the browsing session as described below.

#### Cookies

The ROSE Platform uses "Cookie" technology. For information regarding the Cookies used by the ROSE 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 and/or its group of companies (hereinafter, “**Reply Group Companies**”), and by third parties providing support on the ROSE Platform by means of automated and non-automated equipment. This data 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 by the ROSE Platform 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.

EU and Swiss residents also have the right to lodge a complaint with the competent Supervisory Authority.

Such requests are to be addressed to e-mail address [onlineservices@reply.com](mailto:onlineservices@reply.com).

California residents may have additional rights and choices. Please see [CCPA Privacy Notice for CA Residents](#) for more information.

Residents of Brazil also may have additional rights and choices. For more information please see the below section ‘Additional Information for Brazil Residents’.

## Children

Reply does not knowingly use its ROSE Platform to request and process data from under age individuals, according to privacy law and further laws and regulations applicable in their country of residence.

## Cookie Policy

The ROSE Platform uses Cookies (the “**Cookies**”) 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 ROSE Platform to the User's browser, which are memorized on the computer and automatically returned to the server every time the ROSE Platform is accessed.

There are various types of Cookies, some used to make using the ROSE Platform more efficient, others to enable certain functions. 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 in an anonymous way the use of the services and contents provided by the ROSE Platform visited in order to optimize the browsing experience and services offered;
- carry out anonymous or personal statistical analysis.

## Types of Cookies used by the ROSE Platform

The types of Cookies used by the ROSE Platform are listed below and grouped according to the purpose for which they are used.

### Technical and strictly necessary Cookies

These Cookies allows certain portions of the ROSE Platform to function correctly and are essential in order to allow the User to browse the ROSE Platform and use its features (e.g. session cookies). **Such Cookies do not require prior consent from the User.**

There are two categories of technical cookies:

- *Persistent.* used to store information, such as the login name and password of the User, in order to prevent the same User from typing them again each time he/she visits the ROSE Platform. These remain stored on the computer even once closed the browser.
- *Session.* used to store temporary information, allowing the User to link actions that are executed during a specific session, and are removed from the computer when the browser is turned off.

Such Cookies, always sent by the ROSE Platform, are necessary for the correct visualization of the ROSE Platform and, in relation to the technical services offered and purchased, 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 ROSE Platform and access ROSE Platform restricted area.

The aforementioned Cookies used by the ROSE Platform avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the Users' navigation of the ROSE Platform, and do not permit the acquisition of identifying personal information regarding the User. This type of Cookies include also **third-party analytics cookies** used to gather information regarding how the User uses the ROSE Platform for aggregated statistical analysis and to improve and simplify the use of the ROSE Platform.

The ROSE Platform uses **Google Analytics** (a web service provided by Google, Inc.) in anonymous way in order to measure visits to the ROSE Platform and to improve use of the ROSE Platform. This type of Cookie gathers information anonymously regarding how the Users use the ROSE Platform. To learn more about Google's privacy practices, please visit the privacy section of the Google Analytics site.

Reply does not use this information to identify Users or to combine such data with other data.

The User may request at any times the full list of all Technical and strictly necessary cookies used by the ROSE Platform.

### **User's consent to Cookies and Cookie banner**

For EU residents, according to Cookie Law (2009/136/CE Directive), the ROSE Platform is not obliged to request consent for Technical and strictly necessary Cookies, as they are necessary in order to provide the services requested. They are therefore installed automatically by the ROSE Platform during the User's first visit to any page of the ROSE Platform.

For BR residents, Reply can rely on the legal basis of legitimate interest in order to provide the services requested, as they are necessary in order to provide the services requested. They are therefore installed automatically by the ROSE Platform during the User's first visit to any page of the ROSE Platform.

When the User accesses the ROSE Platform a special banner ("**Cookie banner**") informs the User that the ROSE Platform uses only Technical and strictly necessary Cookies.

### **How to manage the Cookies used by the ROSE Platform through browser configuration**

The User has the opportunity to delete individual Cookies from his or her device by consulting the 'Help' menu in the internet browser.

To delete Cookies from the internet browser of a smartphone/tablet, the User should refer to the device's

user manual to find further information.

The User can learn more about cookies and how to block cookies on different types of browsers by visiting <https://www.allaboutcookies.org>.

### **Additional Information for EU/UK/Swiss Residents**

Reply provides the User with this Cookie Policy pursuant to Section 13 of EU Regulation No. 679/2016 and UK General Data Protection Regulation, concerning the protection of individuals with regarding to the processing of personal data.

The Data Controller for the processing of User 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.

If the User has questions or concerns about our collection or use of his or her personal data, the User can contact our Data Protection Officers (DPO) at:

- 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.uk](mailto:dpo.uk@reply.uk)

If the User is unsatisfied with the way in which we have handled User personal data or any privacy query or request that the User has raised to us, the User has the right to complain to the appropriate National Data Protection Authority (“DPA”) or the Information Commissioner's Office (ICO) or the Federal Data Protection and Information Commissioner (FDPIIC). To find the contact details of the DPA in the User EU country of residence, the User can visit the EU Commission’s directory of DPAs.

### **Additional Information for California Residents**

If the User is a resident of the State of California, please see [CCPA Privacy Notice for CA Residents](#) for additional information about our processing of personal information and your California privacy rights.

### **Additional Information for Brazil Residents**

Reply provides the User with this Cookie Policy pursuant to Law No. 13.709/2018 (LGPD), that is concerning the personal data protection of individuals with regarding to the processing of data.

If the User has questions or concerns about our collection or use of User personal data, the User can contact us at:

- Brazil: [privacy.security.br@reply.com](mailto:privacy.security.br@reply.com)

We will answer data subjects’ requests within 15 (fifteen) days upon receipt.

If you are resident in Brazil, you have also the right to:

- a) confirm and access your personal data free of charge.
- b) request that personal data be rectified or updated, when that personal information is inaccurate, incomplete, or not updated.
- c) request the portability of data, in accordance with further regulation.
- d) request that personal data be deleted in case the processing activity is based on consent.
- e) request information about the consequences of not providing the consent, whenever requested.
- f) request information about public and private entities with which we share your personal data.
- g) revoke the consent at any time, provided that the relationship that gave rise to the data processing has ended and that there is no legal or contractual obligation to keep the personal data in the company’s databases.
- h) object to the processing of their personal data based on one of the legal bases other than your consent, if there is noncompliance with the provisions of the LGPD.

- i) file a claim before the competent governmental authorities, such as the national data protection authority and consumer defence entities.  
request review of decisions taken solely on the basis of automated processing of personal data that affects your interests, including decisions intended to define your personal, professional, consumer and or aspects of your personality, if applicable.

### **Updates to This Cookie Policy**

We may make changes to this Cookie Policy from time to time. The “Last Update” noted at the top of this page shows when this Cookie Policy was last revised. Any changes will become effective when we post the revised Cookie Policy on this site.

### **Contact Us**

If the User has any comments or questions regarding this Cookie Policy or our data handling practices, please contact us at [onlineservices@reply.com](mailto:onlineservices@reply.com). The User may also send us a letter at the following address:  
Reply S.p.A.  
Corso Francia n. 110  
Torino, Italy