

Rose Reply CCPA Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained in Reply S.p.A's ("**Company**," "**Reply**," "**us**," "**we**" or "**our**") Reply Marketing Privacy Notice, and Reply Privacy and Cookie Policy, which are incorporated herein by reference, and applies solely to individuals who reside in the State of California ("**Consumers**" or "**you**"). We adopt this notice as required by the California Consumer Privacy Act of 2018 ("**CCPA**") and any terms defined in the CCPA have the same meaning when used in this Notice.

INFORMATION WE COLLECT

Reply (as defined in our Reply Privacy Marketing Notice) may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or device ("**Personal Information**"). Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as: (i) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and (ii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, Reply (as defined in our Reply Marketing Privacy Notice) has collected the following categories of personal information within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, postal address, unique personal identifier, Internet Protocol address, e-mail address, account name, or other similar identifiers, LinkedIn public data.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, employment, employment history. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	none	NO
D. Commercial information.	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	none	NO
F. Internet or other similar network activity.	Information on a consumer's interaction with a website, application, or advertisement. (advertisement only if they fill out form).	YES
G. Geolocation data.	Physical location (only if they fill out a form, not just browsing).	YES
H. Sensory data.	Audio, electronic or visual information.	YES

I. Professional or employment-related information.	none	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	none	NO
K. Inferences drawn from other personal information.	none	NO

We obtain the categories of Personal Information listed above from the following categories of sources: (i) directly from you; for example, from forms or surveys you complete or products and services you purchase; and (ii) indirectly from you; for example, from observing your actions on our website, or (iii) from our business relationship with you.

USE OF PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop the Reply Services and to understand user behavior by showing what parts of the Website you visited and stayed on.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud, verify your identity, and invoice you for any relevant payment.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns, monitor and improve our responses, and to diagnose possible problems with our Website and accompanying Services.
- To personalize your Website experience, understand your preferences, and to deliver content and product and service offerings relevant to your interests, including targeted offers, ads, news, educational materials, and/or our partners' services through our Website, third-party sites, and via e-mail or text message.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For marketing the Reply Services.
- For testing, research, analysis, and product development, including to develop and improve the Reply Services to better serve you and/or to provide Services more effectively.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To help Reply compile aggregate data about our Website traffic and interaction with the Website so we can offer you better experience and tools in the future.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Reply's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar

proceeding, in which personal information held by us about our Website users, information obtained from our Customers through the use our Services is among the assets transferred.

- To undertake internal research for technological development and demonstration.
- To conduct auditing related to a current interaction with a Consumer and concurrent transactions
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To conduct debugging to identify and repair errors that impair existing intended functionality.

SHARING PERSONAL INFORMATION

We may disclose your personal information to a third party or Reply Group Companies (as defined in our Reply Marketing Privacy Notice) for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

Disclosures of Personal Information for a Business Purpose. In the preceding twelve (12) months, Reply has disclosed the following categories of personal information for a business purpose:

Category	Examples	Collected
A. Identifiers.	A real name, postal address, unique personal identifier, Internet Protocol address, e-mail address, account name or other similar identifiers. LinkedIn public data.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, employment or employment history. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	none	NO
D. Commercial information.	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	none	NO
F. Internet or other similar network activity.	Information on a consumer's interaction with a website, application, or advertisement (advertisement only if they fill out form).	YES
G. Geolocation data.	Physical location (only if they fill out a form, not just browsing).	YES
H. Sensory data.	Audio, electronic or visual information.	YES
I. Professional or employment-related information.	none	NO
J. Non-public education	none	NO

information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).		
K. Inferences drawn from other personal information.	none	NO

We disclose personal information for a business purpose to the following categories of third parties: (i) service providers (e.g., processors, contractors, suppliers, vendors, etc.); (ii) data aggregators; and (iii) Affiliates (as defined in our Reply Marketing Privacy Notice) and partners.

Sales of Personal Information. We do not sell Personal Information as defined under the CCPA. Because we do not sell personal information, we do not have actual knowledge that we sell personal information of Consumers who are under 16.

YOUR RIGHTS AND CHOICES

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Request Disclosure. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months, including:

- The categories of personal information we collected about you.
- What personal information we collect, use, or disclose about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- For each category of personal information, the categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Right to Request Deletion . You have the right to request that we delete your personal information that we collected from you and retained, subject to certain exceptions. For more information on how to request deletion, please see the Submitting CCPA Requests section below. Once we receive your request and verify your identity, we will review your request to see if an exception allowing us to retain the information applies. We will delete or de-identify personal information not subject to an applicable exception from our records.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or Affiliates to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those

responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Request Opt-Out of the Sale of Your Personal Information. If you are age 16 or older, you have the right to direct us not to sell your personal information at any time. We do not sell personal information, as defined by the CCPA.

Non-Discrimination. You have the right to be free from discriminatory adverse treatment for exercising these rights. We will not discriminate against you for exercising any of your CCPA rights.

Submitting CCPA Requests.

Requests to Know or Delete. To exercise your rights to know or delete described above, you may submit a request by e-mailing us at: onlineservices@reply.com or by writing us at: Reply S.p.A., Corso Francia n. 110, Torino, Italy

Requests to Opt-Out of Sales of Personal Information. As noted above, we do not sell personal information as defined under the CCPA.

Verification of Requests. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, or make a request on behalf of a Consumer for whom you are an authorized agent, please submit verification documentation by emailing us at onlineservices@reply.com.

You may only make a verifiable consumer request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may request information from you in order to verify your identity. Additionally, we may require that authorized agents provide proof of their authorization. We cannot respond to your request or provide you with personal information if we are unable to verify your identity, your authority to make a request on behalf of another person, or if we cannot confirm that the personal information relates to you. In general, we will verify your request and your identity by matching the information you provided with the information we have in our records.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

OTHER CALIFORNIA PRIVACY RIGHTS

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to onlineservices@reply.com.

Under California's "Shine the Light" law, residents of California are further entitled to be advised how we handle "Do Not Track" browser signals. Because there currently is no industry or legal standard for recognizing or honoring "Do Not Track" browser signals, we do not respond to Do Not Track requests at this time. We use the usual types of tracking systems that are standard practice in advertising (e.g., Google AdWords) to track you over time and across third-party websites to provide targeted advertising and therefore do not respond to "Do Not Track" signals.

CHOICES REGARDING OUR USE OF PERSONAL INFORMATION

Choices About How We Use and Disclose Your Information. We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your cookie settings, you may visit <https://www.aboutads.info/choices>. You may need to do this again each time you use a different IP address or device. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your contact information (including e-mail address) used by the Company to promote our own or third parties' products or services, you can click the "unsubscribe" link at the bottom of the relevant promotional e-mail or send us an e-mail stating your request to onlineservices@reply.com. If we have sent you a promotional e-mail, you may send us a return e-mail asking to be omitted from future e-mail distributions. Such requests do not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can set your browser opt-out accordingly.

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this privacy notice at our discretion and any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of the Reply Services following the posting of changes constitutes your acceptance of such changes.**

CONTACT INFORMATION

If you have any questions or comments about this notice, the ways in which Reply collects and uses your information described here, your choices and rights regarding such use, or have questions about how to exercise your rights under California law, please do not hesitate to contact us at:

Website: www.reply.com

E-mail: onlineservices@reply.com

Postal Address:

Reply S.p.A.
Corso Francia n. 110
Torino, Italy