

## Privacy Notice

Pursuant to article 13 of the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* (hereinafter “GDPR”), this Privacy Notice is issued to Data Subjects who wish to request the information/promotional kit (hereinafter “Promotional Kit”) regarding the Challenge detailed on the webpage in which the online form, to require the Promotional Kit, is accessible (hereinafter “Challenge”).

The request to receive, for free, the Promotional Kit must be submitted through the online form published at URL: <https://challenges.reply.com/tamtamy/page/challengekit>

Please note that the request is reserved for (hereinafter “Eligible Applicants”):

- high school teachers
- university professors
- students at least 16 years old
- subjects who work professionally in the educational field (including journalists)

**Pursuant to article 12 of GDPR, the information must be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.**

### **Data Controller - Who we are**

Reply S.p.A., with registered offices in Torino, Corso Francia, 100 - Tax ID: 9757921001 and VAT number: 08013390011 is the Data Controller of your personal data (hereinafter “Data Controller” or “Reply”).

This means the Reply decides how personal data are processed and for what purposes.

The Data Protection Officer of Reply (DPO) has been appointed and his registered office is c/o Reply S.p.A. in the local office located in Milano, Via Robert Coch, 1.

### **Your personal data – What they are**

As per definition of the GDPR, ‘*personal data*’ means any information relating to an identified or identifiable natural person (‘*data subject*’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This means the data by which the Data Subject, as natural person, can be identified. Identification can be by the information alone or in conjunction with any other information in the Data Controller’s possession or likely to come into such possession. If the Data Subject will complete the request to receive the Promotional Kit, through the online form, Reply will process his/her personal data as per this Privacy Notice, in compliance with GDPR.

### **Data processing**

For the processing of personal data, we mean, pursuant to article 4 of GDPR: *any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.*

Such data will be processed with the support of IT or telematic means and/or manual modalities for the purposes described below.

### **Promotional Kit request (primary purposes): legal basis for the data processing**

The processing of the requested personal data that the Data Subjects must provide filling out the online form, pursues the purposes of:

- 1) verifying that the request comes from an Eligible Applicant
- 2) if the verification is successful, delivering the Promotional Kit to the address provided through the online request form.

The above request procedure consists in filling out an online form in which it is required to indicate name, surname, e-mail address of the Data Subject together with the School or University address (in case of teacher, professor or student) or the work address (in the other cases).

### **Mandatory or optional consent for the pursuit of the primary purposes of data processing**

In order to pursue the primary purposes of the processing, in the manner described above, the Data Controller is not obliged to acquire the specific consent to the processing of data of the Data Subjects, as the processing is necessary to verify the eligibility of applicants and fulfill the delivery of the Promotional Kit.

If the Data Subject did not intend to provide the personal data requested and necessary based on the above, it would not be possible to deliver the Promotional Kit.

### **Communication and dissemination of personal data for the pursuit of primary purposes of data processing**

The subjects or categories of subjects who may become aware of the personal data, as data processor or persons in charge of the processing, are:

- employees of the Data Controller appointed as persons in charge of the processing and/or system administrators
- third parties, appointed as Data Processors, who provide Reply with support activities in administration and logistics. All the third parties that will process the data as Data Processor guarantee that will not process the data for purposes different from the ones above described, as per the specific contract or other legal act by which the Data Processor appointed the Data Processor.

In all cases related to the primary purposes of the processing, the Data Controller may communicate personal data to third parties to whom communication is necessary for the fulfillment of the Promotional Kit delivery. Suppliers of dispatch services used by Reply for delivering the Promotional Kit are also required to process the data exclusively to provide the dispatch service requested and act as independent data controllers.

In addition, for the pursuit of the primary purposes, the data may be disclosed to any other third party when the communication is mandatory by law.

The personal data of the Data Subject will not be disseminated.

### **Information regarding Challenges possibly organized in the future (secondary purposes): legal basis for the data processing**

Personal data collected for the primary purposes described above could also be processed using computer or manual methods, to contact the data subject in case Reply will organize, in the future, new Challenges open to students.

To proceed with the processing for the aforementioned purposes, it is mandatory to acquire a specific, separate, optional, free and informed consent by the Data Subject.

By consenting to the aforementioned processing, the Data Subject therefore acknowledges that the Data Controller will be able to contact the Data Subject by e-mail, in order to send information regarding new Challenges.

The Data Subject will be able to revoke his consent to the processing, sending a communication to the address of the Data Controller as indicated below.

### **Mandatory or optional consent for the pursuit of the secondary purposes of data processing**

The consent to the processing for secondary purposes (information regarding Challenges that Reply could organize in the future), by the Data Subject, is absolutely elective and optional.

Therefore, even in the absence of such consent, the Data Subject can still require the Promotional Kit.

### **Communication and dissemination of personal data for the pursuit of secondary purposes of data processing**

The subjects or categories of subjects who may become aware of the personal data, as data processor or persons in charge of the processing, are the employees of the Data Controller appointed as persons in charge of the processing and/or system administrators.

The personal data of the Data Subject will not be communicated to third parties or disseminated.

### **Place, data retention periods and additional information**

The website, through which the collection, storage and processing of personal data for the purposes set out in this Privacy Notice is carried out, is installed on a cloud system located within the European Union.

The data will be retained for the period necessary to organize the Promotional Kit delivery; after verification that the Promotional Kit has been successfully delivered, the data will be erased.

For the purpose to send information regarding new Challenges that Reply could organize in the future, the data will be retained

for 24 months from collection or lower term if the Data Controller receives from the Data Subject revocation of consent and/request for erasure.

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

### **Exercise of rights by Data Subject**

The Data Subject has the right:

- to access personal data (that is asking a copy of your personal data to Data Controller);
- to rectify personal data (that is the right to correct or update your personal data);
- to erasure personal data (the so-called “right to be forgotten” that is the right to ask the erasure of personal data if the retention is no longer necessary in relation to the purposes for which they were collected or otherwise processed, or the Data Subject withdraws an optional consent on which the processing was based and there is no other legal ground for the processing, etc.);
- to restrict the processing of personal data (that is the right to revoke the optional consent if given);
- to data portability (that is the right to receive your personal data provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Reply);
- to lodge a complaint with the Italian Data Protection Authority, following the procedures and indications published on the Authority's official website on [www.garanteprivacy.it](http://www.garanteprivacy.it).

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the data subject about those recipients if the Data Subject requests it.

The exercise of the rights is not subject to any form constraint and is free of charge.

The address to write to exercise the rights is:

by e-mail: [challenges@reply.com](mailto:challenges@reply.com)

or by mail: to Reply's registered office