

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 the terms of section 13 of Italian Legislative Decree no. 196 of 30 June 2003 (hereafter referred to as "Privacy Code"). 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

Types of processed data

Navigation data

IT systems and software procedures adopted for the functioning of this Website, as a part of their normal functioning, collect various items of personal data. Such personal data are transferred as a part of the normal course of events when using the Internet (based on TCP/IP protocol).

This information 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 relative to operating system and to user's IT environment. This data is only to be used for anonymous statistical information on to use of the Reply Challenges Website and for control of correct functioning of this Website.

Please note that these data may be used for investigations directed at identifying any persons responsible for actions qualified as computer crime, which are detrimental to the website of Reply S.p.A. or linked websites. If no such investigations are conducted, the data relative to web contacts are 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 (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.

Data Controller

The Data collected as indicated above will be processed by Reply S.p.A. with registered office in Turin, Corso Francia 110, in the person of its *pro-tempore* legal representative, as Data Controller.

Processing procedures and security measures

Personal data are processed by automated means for no longer than is necessary to achieve the purposes for which they have been collected.

Specific security measures are implemented to prevent the data from being lost, used unlawfully and/or inappropriately, and accessed without authorization.

Data subjects' Rights

The individuals to whom the personal data collected refer in the aforementioned sections (hereinafter referred to as "Data subjects") have the right, at any time, to be informed of the existence of any such data and to be informed of content and origin of the data. They have the right to check it for accuracy or to request additions or updating. They also have the right to correct such data according to the terms of Section 7 of the Privacy Code. The Data subjects have the right to request erasure, anonymisation or blocking of any data that is processed in breach of the law as well as to object in all cases, on legitimate grounds, to processing of the data. All requests should be emailed to e-mail address challenges@reply.com or sent to Reply S.p.A. - Corso Francia n. 110 - 10143 Turin.

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.

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.

The analytical cookies used are sent by Google (*Google Analytics*), are therefore "third-party" cookies and are used by the Website for the sole purpose of statistically analyzing the accesses or visits to the site itself and allowing the owner to improve the structure, the navigation logics and contents. According to Italian Data Protection Authority regulation, the Google Analytics have been anonymized.

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.

First and third party cookies for advertising/marketing / retargeting

The Cookies in this category are both first party and third-party and are used to create user profiles in order to send advertising messages or present advertising banners when the user is browsing on other websites, in line with the preferences demonstrated by the user within the pages of the Website.

These cookies 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 |

| COOKIE NAME | COOKIE DOMAIN |
|-------------|-------------------|
| lang | .ads.linkedin.com |
| lidc | .www.linkedin.com |

The user's consent

According 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 Cookie, consent is requested via a pop-up banner: this implies user's active behavior by clicking on the "OK" button.

The user can give his or her consent also 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

1. Click on the  ("Settings") menu in the browser's toolbar next to the window for inserting the url when browsing.
2. Select "Settings".
3. Click on "Show Advanced Settings" at the end of the list.
4. In the "Privacy" section click on the "Contents settings" button.

5. 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

1. Click on the  (“Settings”) menu in the browser’s toolbar next to the window for inserting the url when browsing.
2. Select “Options”
3. Select the “Privacy” panel
4. In the “Tracking” section it is possible to modify the following settings regarding Cookies:
 - Tell sites that I do not want to be tracked
5. 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

1. Click on the “Tools” button and select “Internet Options”
2. 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

1. Click on Safari, select Preferences and click on Privacy
2. In the Block Cookies section specify how Safari must accept Cookies from websites.
3. 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 the Cookies 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.

Listed below are the links to the pages containing the information and specific instructions from third parties:

- Google Analytics: <http://www.google.it/analytics> e 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>

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.