

Privacy Notice

Reply S.p.A. (hereinafter, "Reply"), as Data Controller of personal data pursuant to article 13 of the Legislative Decree 30 June 2003, no. 196 and of the UE General Data Protection Regulation provides the following information.

This Privacy Notice is issued to Data Subjects who wish to register on the platform accessible at the URL: challenges.reply.com (hereinafter, "Platform").

Provided that the registration to the Platform is free (subject to the necessary connection to the Internet with normal tariff plan), the Platform aims to allow members to test their skills in software programming, individually or in teams, both through the section called Training Area, and to demonstrate them in the context of a possible Challenge (as published on the Platform and under the relevant Terms & Conditions dedicated to it).

It is strongly recommended that the Data Subject frequently consults this document, in order to know the possible variations or modifications that could be made to it, mainly due to regulatory changes.

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.

Primary purposes of data processing

The processing of the requested personal data that the Data Subjects must provide during the registration procedure through the Platform, pursues the purposes of:

- allowing the subject to use the services offered by the Platform, including the Training Area;
- make it possible for the Data Subjects to accede to a possible Challenge that takes place in accordance with the relevant Terms & Conditions;
- allow the Data Subjects to request support during the eventual development of a Challenge;
- update the data subject, including by e-mail, regarding new technical contents published on the Platform (for this purpose, it is specified that the Platform does not provide for the publication of banners or advertising content aimed at selling products or services).

The above registration procedure consists in filling out an online form in which it is required to indicate personal data - some to be entered obligatorily and others (including the so-called 'Avatar' consisting in a graphic icon or a photo of the Data Subjects) optionally - for the activation of access credentials (login + password) with which the Data Subjects will be identified at subsequent accesses. Therefore, the fulfillment of the registration procedures, the creation of the access credentials, the enrollment procedures, the consequent technical and administrative management of the Platform, including the technical or operational assistance that may be requested by the Data Subjects for the sections of the Platform where it is planned are included as part of the processing.

If the Data Subject decides, freely and optionally, to enter the 'Avatar' during the registration procedure must be aware that the Avatar will be part of his account on the Platform and will be visible by the other users of the Platform.

In any case, personal data may also be processed to fulfill the obligations provided for by Italian or EU legislation, as well as for civil, accounting and tax purposes, in particular related to the performance of a possible Challenge.

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 fulfill regulatory or contractual obligations related to the provision of functionality offered by the Platform and a possible Challenge.

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 register with the Platform and use the related functionalities.

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

In all cases related to the primary purposes of the processing and in particular in the case where a Challenge is organized, the Data Controller may communicate personal data to third parties to whom communication is necessary for the fulfillment of the provisions of the relevant Terms & Conditions and Waiver as well as the current legislation in this area, including: companies or individuals involved in the Challenge, companies or professional firms that provide Reply with assistance or advice in accounting, administrative, legal, tax and financial matters relating to the Challenge, etc.

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 or in compliance with the provisions, in the case of a Challenge, the relevant Terms & Conditions and Waiver.

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;
- third parties who provide Reply with support activities in the organization and management of all the obligations related to the management of the Platform and of a possible Challenge, appointed - where necessary – as Data Processors.

Finally, in the event of a Challenge providing for the assignment of rights on computer programs, in this case transferred by the only subjects that, pursuant to the Terms & Conditions, have been selected for this purpose obtaining the corresponding payment in kind provided, the data personnel consisting of the name and surname of these subjects will be disseminated as authors of the work (being the moral right on the software code that constitutes it - as a work consisting of a computer program - inalienable, imprescriptible and indispensable).

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

Secondary purposes of 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 for potential recruitment activities by the Data Controller.

To proceed with the treatment 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 such purposes of recruiting the personnel entail the right, for the Data Controller, to contact the Data Subject either by telephone (by operator) or by e-mail.

The ability for the Data Subject remains in place, in addition to being able to totally revoke his consent to the processing, to communicate his will to receive the aforementioned communications only by one of the contact information (telephone or e-mail). This communication will be sent to the address of the Data Controller as indicated below.

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

The consent to the processing for secondary purposes of recruitment of personnel, by the Data Subject is absolutely elective and optional.

Therefore, even in the absence of such consent, the Data Subject can still register and use the features offered by the Platform.

Place, data retention periods and additional information

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

The data will be retained for the period defined by the reference legislation (five-year or ten-year terms for the conservation of documents and related data of a civil, accounting and tax nature as required by the current laws) and for the period necessary to perform the services offered by Platform or lower term, if the Data Controller receives from the Data Subject a revocation of consent and/or request for cancellation (provided that, in case of request for cancellation, will be less, for the person concerned, the ability to access the Platform).

With reference instead to personal data processed for secondary purposes, the same 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 cancellation.

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

Privacy roles

The Data Controller is Reply S.p.A. with registered office in Turin, Corso Francia, 100

The updated list of Data Processors - if appointed - can be obtained from the aforementioned company.

The Data Protection Officer of Reply S.p.A. 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.

Exercise of rights by Data Subjects

The Data Subjects:

- have the right to ask the Data Controller to access personal data, correct or delete them, or limit their processing or to oppose their processing, in addition to the right to data portability;
- have the right 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.

Any corrections or cancellations or limitations of the processing performed at the request of the Data Subjects, except in cases where this proves impossible or involves a manifestly disproportionate means, will be communicated by the Data Controller to each of the recipients to whom the personal data was transmitted. The Data Controller of the information may inform the recipient of these recipients on request.

The exercise of these 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

or

by mail: to Reply's registered office