## 'Reply Student Clash' Privacy Notice

Reply S.p.A. ("**Reply**," "we," or "us") respects your privacy and is committed to protecting it through our compliance with this Reply Student Clash Privacy Notice ("**Privacy Notice**"). This Privacy Notice describes the information we collect and process related to your registration to the Student Clash Event organized with JEToP ("**Event**") by filling in a registration form managed by JEToP ("**Form**") clashreply.jetop.com, and what choices you have with respect to the information.

This Privacy Notice applies to Data Subjects registering to the Event.

## A) Personal data, collected when you fill in online Form

1) Purposes of the processing for which the data processing is necessary. The legal basis for the processing. The length of time the data will be kept.

The Personal Data provided by you through the Form may include name, email address, phone number, organization or university, registration number, CV, course of study.

Your personal data are collected by JEToP when you fill in the Form and they will be shared with Reply for the following purposes:

- a) to enable you to take part in the Event organised by Reply and to manage this Event. The legal basis for the processing is the contractual relationship through which you may participate in the Event. Your personal data will be kept for the time strictly necessary for this purpose.
- b) to carry out the necessary evaluations, also basing on your curriculum vitae provided to JEToP during the registration form, in order to possibly establish a job or contract relationship with one of the Companies in the Reply Group. Following a successful evaluation for potential career opportunities at Reply, your personal data will be processed in accordance with the Privacy Notice for Candidates available in the footer of the Reply website <a href="www.reply.it">www.reply.it</a> and in such case the legal basis for the processing is the execution of pre-contractual activities.
- c) to comply with obligations set forth in laws, regulations and applicable legislation, as well as to comply with orders issued by authorities that are lawfully permitted to do so, or by supervision and control authorities, including in respect of the prevention and detection of information technology offences, as well as to manage any complaints or disputes. The legal basis for the processing is the legislation applicable to each type of processing. The data will be kept pursuant to ordinary limitation periods set forth by applicable laws.

In order to register online to the Event, it is compulsory to enter the personal data marked with an asterisk (\*) in the Form in order to pursue the activities described above; failure to provide this data, or the partial or incorrect provision of such data will therefore make it impossible for you to register to the Event or to use the requested contents. Entering data not marked with an asterisk is purely optional; failure to provide this data or the partial or incorrect provision of such data will therefore not prevent you from registering on the Reply Student Clash Event.

# 2) Additional purposes of the processing subject to specific and explicit consent. The legal basis for the processing. The length of time data will be kept.

Subject to your explicit consent and until the withdrawal of said consent, your personal data may also be processed in order to send you:

- a) promotional communications regarding Reply events or webinars, students initiatives and/or
- b) Communications regarding potential career opportunities at Reply, using automated tools (e.g. SMS, MMS, fax, e-mails and web applications) and traditional marketing mechanisms (e.g. operator-assisted phone calls and/or mailing).

You will therefore be required, by means of online Form, to provide your consent to personal data processing above describe. Should you deny or withdraw your consent to the purposes described above, your data will be processed only for the purpose 1) referred to in letter A) above.

The legal basis for using the personal information you provide us for this purpose is your consent. Your personal data will be kept by Reply until you withdraw said express consent.

Furthermore subject to your explicit consent, special categories of personal data pursuant to art. 9 of the Regulations, as data relating to any allergies, intolerances and / or eating habits may be voluntary provided by you, which will be used only by JEToP for the sole purpose of administration of meals during the Event. In this circumstances, JEToP will act as an independent Data Controller.

## B) Processing method

The data processing may be made manually or through electronic procedures, for achieving the purposes indicated above and for the time strictly necessary to pursue these purposes; as well as, in any case, for the purpose of protecting, where applicable and depending on the state of the art, the security and confidentiality of the personal data by means of suitable measures to prevent the risk of loss, unauthorized access, illicit use and dissemination.

#### C) Categories of third parties that may become privy to your personal data

In addition to Reply employees, your personal data may be processed, on behalf of Reply, as Persons in charge of the processing, by Reply Group Companies and by third parties, (e.g. individuals or legal entities, appointed by Reply to perform technical interventions, repairs, routine and extraordinary maintenance, consultants; business partners, vendors entrusted to perform certain activities functional to the purposes).

Your personal data related to the Event will be processed also by JEToP as Data Processor, duly appointed by Reply, who manages the registration form and the organization of the Event.

Under the circumstances of co-marketing or joint pre-sales activities, your personal data may also be communicated to the involved third parties (e.g. business partners, sponsors, vendors, etc.). If the third parties should act as autonomous data controller, they will be in charge to inform you regarding data processing for their own purposes and to collect your consent, if necessary.

Your personal data may also be communicated to the Data Protection Authority and all other public bodies authorized to request the data.

Apart from the third parties identified above your data will not be subject to any wider dissemination by Reply.

#### D) Extra-EU/UK Data transfer

Your personal data will be processed in the EEA/UK, in particularly in the EEA/UK countries where Reply Group Companies are based (see the section Office Locations & Contacts on www.reply.com), for the purposes specified in this Privacy notice.

## E) The right to access personal data and other rights

You have the right to request access to your personal data processed by Reply, to obtain the correction or deletion of said data, or to limit the processing by Reply of Your personal data.

You have the right to withdraw your consent at any time without prejudice to the lawfulness of the processing based on the consent given before withdrawal.

You have the right to lodge a complaint with the competent Supervisory Authority.

Such rights may be exercised emailing us at: <a href="mailto:studentclash@reply.com">studentclash@reply.com</a>

## F) Data Controller and Data Protection Officer (DPO)

The Data Controller of the processing of your personal data is Reply S.p.A., with registered office in Corso Francia n. 110, Turin (Italy), represented by the pro tempore legal representative.

## DPOs contacts are:

o DPO Italy: <a href="mailto:dpo.it@reply.it">dpo.it@reply.it</a>

DPO Germany: <a href="mailto:dpo.de@reply.de">dpo.de@reply.de</a>
DPO UK: <a href="mailto:dpo.uk@reply.com">dpo.uk@reply.com</a>