

## ClickReply website privacy policy

This page provides an outline of the way the personal data of ClickReply website visitors is managed. This notice is also provided according to the terms of art. 13 of Italian Legislative Decree no. 196 of 30 June 2003 (hereafter referred to as Privacy Code). This notice is addressed to all who interact via the web services provided by Reply, accessed by electronic telecommunications means through the address: <http://www.clickreply.eu> (or [www.clickreply.it](http://www.clickreply.it))

This notice only applies to the ClickReply website. It does not apply to any non-Reply sites accessed via links. The notice also takes full account of *Recommendation 2/2001 of the European personal data protection authorities* of 17 May 2001. These authorities formed the Group instituted by means of art. 29 of Directive 95/46/CE. The Group's purpose in making their recommendation is to lay down minimum requisites for online collection of personal data. This consists in establishing the methods and time schedules the data processor must conform to, and the types of information data processors must provide to users accessing web pages, irrespectively of the reasons for accessing.

### Data processor

When identified or identifiable users access this site, the personal data of the said users may be processed. The data processor is Reply S.p.A. (registered office: Corso Francia 110, Torino). The persons managing any data processing are specified in the various sections of the website.

### Location of data processing

Processing of data relative to web services provided by this website take place in the said head offices and on premises located at the address Via Ripamonti 89 in Milan. The data is processed exclusively by Reply staff entrusted with this task. No personal data generated by the web service is transferred to third parties. The personal data provided by users are used for the sole purposes of providing requested services and performing the tasks requested. This information is transferred to third parties only when necessary in furtherance of these interests.

### 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. The said personal data is of the kind that is 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 the navigating users.

This class of information includes the 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 the operating system and to the user's IT environment. This data is only to be used for anonymous statistical information relative to use of the ClickReply website and for control of correct functioning of the said website.

Please note that the said data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the website of ClickReply. or linked websites. If no such investigations are conducted, the data relative to web contacts is destroyed in a few days.

#### *Data provided voluntarily by user*

When requests are made to send e-mail messages to the addresses indicated in the address section of the ClickReply 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). Specific notices in summary form are progressively included or displayed on the website pages hosting the specific services that may be requested.

### *Cookies*

No cookies are used to transfer information of a personal nature. No so called persistent cookies of any kind are used (persistent cookies are systems that enable tracking of users). Use of so-called session cookies (which are stored temporarily by the user's computer and which are normally deleted when the browser is no longer used) is strictly limited to transfers of the session identification data (consisting in random numbers generated by the Reply web server) required for secure, efficient website exploration.

The session cookies used by the ClickReply website rule out the need to adopt other IT procedures which represent potential threats to user navigation privacy. These cookies do not collect user personal data identifying the user.

### **Facultative nature of personal data transfers**

Apart from the above-described navigation data, users are free to provide personal information in the electronic request forms in website sections for specific requested services. Please also note that it may not be possible to process requests if this data is not provided.

### **Processing procedures and security measures**

Personal data is processed by means of automated and non-automated equipment. It is processed only for the length of time required to fulfil the tasks for which the said data was collected. Conformity with specific security measures is ensured in order to prevent data losses, illicit or incorrect use, and unauthorized access.

In the sections of the website dedicated to specific services, when personal data is required from the navigating user, the data is **ciphered** by means a security technology resource termed Secure Sockets Layer (**SSL**). SSL technology codifies the information before it is transmitted via the Internet between the user's computer and the Reply central systems. This information is rendered incomprehensible to unauthorized parties, in order to ensure the privacy of information transmitted in this manner. SSL use requires a compatible browser capable of permitting 'exchange' of security keys of a minimum length of 128 bits, enabling secure connection, as described, with Reply's central systems.

### **Rights of individuals concerned**

The individuals referred to by the personal data collected in the aforementioned sections have the right, at any time, to be informed of the existence of any such data, and to be informed of the content and origin of the said 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 art. 7 of the Privacy Code. The individuals concerned have the right to request that the said data be deleted or rendered anonymous or, when their motives are legitimate, to oppose processing of the said data. Requests of this nature are to be addressed to the e-mail address [privacy@reply.it](mailto:privacy@reply.it) or sent to Reply S.p.A. – Corso Francia n. 110 – 10143 Torino.

### **Minors**

Reply does not knowingly use its website to request data from minors or persons of less than 18 years of age.