

Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained in Reply S.p.A's ("**Company**," "**Reply**," "**us**," "**we**" or "**our**") Reply Marketing Privacy Notice, and Reply Privacy and Cookie Policy, which are incorporated herein by reference, and applies solely to individuals and others who reside in the State of California ("**Consumers**" or "**you**"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("**CCPA**") and any terms defined in the CCPA have the same meaning when used in this Notice.

INFORMATION WE COLLECT

Reply (as defined in our Reply Privacy Marketing Notice) may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or device ("**Personal Information**"). Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as: (i) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and (ii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, Reply (as defined in our Reply Marketing Privacy Notice) has collected the following categories of personal information within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, postal address, unique personal identifier, Internet Protocol address, e-mail address, account name, or other similar identifiers, LinkedIn public data.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, employment, employment history. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification	none	NO

characteristics under California or federal law.		
D. Commercial information.	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	none	NO
F. Internet or other similar network activity.	Information on a consumer's interaction with a website, application, or advertisement. (advertisement only if they fill out form).	YES
G. Geolocation data.	Physical location (only if they fill out a form, not just browsing).	YES
H. Sensory data.	Audio, electronic or visual information.	YES
I. Professional or employment-related information.	none	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	none	NO
K. Inferences drawn from other personal information.	none	NO

We obtain the categories of Personal Information listed above from the following categories of sources: (i) directly from you; for example, from forms or surveys you complete or products and services you purchase; and (ii) indirectly from you; for example, from observing your actions on our website, or (iii) from our business relationship with you.

USE OF PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop the Reply Services and to understand user behavior by showing what parts of the Website you visited and stayed on.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud, verify your identity, and invoice you for any relevant payment.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns, monitor and improve our responses, and to diagnose possible problems with our Website and accompanying Services.
- To personalize your Website experience, understand your preferences, and to deliver content and product and service offerings relevant to your interests, including targeted offers, ads, news, educational materials, and/or our partners' services through our Website, third-party sites, and via e-mail or text message.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For marketing the Reply Services.
- For testing, research, analysis, and product development, including to develop and improve the Reply Services to better serve you and/or to provide Services more effectively.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To help Reply compile aggregate data about our Website traffic and interaction with the Website so we can offer you better experience and tools in the future.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Reply's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users, information obtained from our Customers through the use our Services is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

SHARING PERSONAL INFORMATION

We may disclose your personal information to a third party or Reply Group Companies (as defined in our Reply Marketing Privacy Notice) for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. The CCPA prohibits third parties who purchase the personal

information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

Disclosures of Personal Information for a Business Purpose. In the preceding twelve (12) months, Reply has disclosed the following categories of personal information for a business purpose:

Category	Examples	Collected
A. Identifiers.	A real name, postal address, unique personal identifier, Internet Protocol address, e-mail address, account name or other similar identifiers. LinkedIn public data.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, employment or employment history. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	none	NO
D. Commercial information.	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	none	NO
F. Internet or other similar network activity.	Information on a consumer's interaction with a website, application, or advertisement (advertisement only if they fill out form).	YES
G. Geolocation data.	Physical location (only if they fill out a form, not just browsing).	YES
H. Sensory data.	Audio, electronic or visual information.	YES
I. Professional or employment-related information.	none	NO
J. Non-public	none	NO

education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).		
K. Inferences drawn from other personal information.	none	NO

We disclose personal information for a business purpose to the following categories of third parties: (i) service providers (e.g., processors, contractors, suppliers, vendors, etc.); (ii) data aggregators; and (iii) Affiliates (as defined in our Reply Marketing Privacy Notice) and partners.

Sales of Personal Information. We do not sell Personal Information.

YOUR RIGHTS AND CHOICES

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Choices About How We Use and Disclose Your Information. We strive to provide you with

choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your cookie settings, you may visit <https://www.aboutads.info/choices>. You may need to do this again each time you use a different IP address or device. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can send us an e-mail stating your request to privacy@reply.com.
- **Promotional Offers from the Company.** If you do not wish to have your contact information (including e-mail address) used by the Company to promote our own or third parties' products or services, you can click the "unsubscribe" link at the bottom of the relevant promotional e-mail or send us an e-mail stating your request to privacy@reply.com. If we have sent you a promotional e-mail, you may send us a return e-mail asking to be omitted from future e-mail distributions. Such requests do not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can set your browser opt-out accordingly.

We do not control third parties' collection or use of your information to serve interest-based advertising. These third parties, however, may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's [website](#).

Deletion Request Rights. You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers and Affiliates to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or Affiliates to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546

et. seq.).

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided

it.

Exercising Access, Data Portability, and Deletion Rights. To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by e-mailing us at privacy@reply.com.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from

one entity to another entity without hindrance, specifically PDF format.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may, however, offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

OTHER CALIFORNIA PRIVACY RIGHTS

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to privacy@reply.com.

Under California's "Shine the Light" law, residents of California are further entitled to be advised how we handle "Do Not Track" browser signals. Because there currently is no industry or legal standard for recognizing or honoring "Do Not Track" browser signals, we do not respond to Do Not Track requests at this time. We use the usual types of tracking systems that are standard practice in advertising (e.g., Google AdWords) to track you over time and across third-party websites to provide targeted advertising and therefore do not respond to "Do Not Track" signals.

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this privacy notice at our discretion and any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of the Reply Services following the posting of changes constitutes your acceptance of such changes.**

CONTACT INFORMATION

If you have any questions or comments about this notice, the ways in which Reply collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please to not hesitate to contact us at:

Website: www.reply.com

E-mail: privacy@reply.com

Postal Address:

Reply S.p.A.
Corso Francia n. 110
Torino, Italy