

Privacy Notice

Pursuant to article 13 of the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* (hereinafter “GDPR”), this Privacy Notice is issued to Data Subjects who wish to request the information/promotional kit regarding the “**Code Challenge Teen Edition**” (hereinafter “Promotional Kit”).

Provided that the Promotional Kit is reserved for teachers of educational establishment attended by students from 14 to 19 years old (hereinafter “School”), the free request must be submitted through the online form published at URL: <https://challenges.reply.com/tamtamy/page/challengekit>

Pursuant to article 12 of GDPR, the information must be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

Data Controller - Who we are

Reply S.p.A., with registered offices in Torino, Corso Francia, 100 - Tax ID: 9757921001 and VAT number: 08013390011 is the Data Controller of your personal data (hereinafter “Data Controller” or “Reply”).

This means the Reply decides how personal data are processed and for what purposes.

The Data Protection Officer of Reply (DPO) 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.

Your personal data – What they are

As per definition of the GDPR, *‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

This means the data by which the Data Subject, as natural person, can be identified. Identification can be by the information alone or in conjunction with any other information in the Data Controller’s possession or likely to come into such possession. If the Data Subject will complete the request to receive the Promotional Kit, through the online form, Reply will process his/her personal data as per this Privacy Notice, in compliance with GDPR.

Data processing

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.

Promotional Kit request (primary purposes): legal basis for the data processing

The processing of the requested personal data that the Data Subjects must provide filling out the online form, pursues the purposes of:

- verify that the request comes from a School attended by students from 14 to 19 years old (since the “Code Challenge Teen Edition” is dedicated to them);
- deliver the Promotional Kit to the School, to the attention of the teacher (the Data Subject), as indicated in the online form.

The above request procedure consists in filling out an online form in which it is required to indicate name, surname and e-mail of the teacher (Data Subject) together with the School address and the number of classes that the teacher would like to invite to the Code Challenge Teen Edition.

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 the delivery of the Promotional Kit, to the School indicated in the online form, to the attention of the teacher (Data Subject).

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 deliver the Promotional Kit.

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, the Data Controller may communicate personal data to third parties to whom communication is necessary for the fulfillment of the Promotional Kit delivery.

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.

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 and/or system administrators;
- third parties who provide Reply with support activities in administration and logistics, appointed as Data Processors.

All the third parties that will process the data as Data Processor guarantee that will not process the data for purposes different from the ones above described, as per the specific contract or other legal act by which the Data Processor appointed the Data Processor.

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

Place, data retention periods and additional information

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

The data will be retained for the period necessary to organize the Promotional Kit delivery within March 15th 2019 (date in which the “Code Challenge Teen Edition” will take place); after verification that the Promotional Kit has been successfully delivered, the data will be erased.

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

Exercise of rights by Data Subject

The Data Subject has the right:

- to access personal data (that is asking a copy of your personal data to Data Controller);
- to rectify personal data (that is the right to correct or update your personal data);
- to erasure personal data (the so-called “right to be forgotten” that is the right to ask the erasure of personal data if the retention is no longer necessary in relation to the purposes for which they were collected or otherwise processed, or the Data Subject withdraws an optional consent on which the processing was based and there is no other legal ground for the processing, etc.);
- to restrict the processing of personal data (that is the right to cancel the optional consent if given);
- to data portability (that is the right to receive your personal data provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Reply);
- 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.

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the data subject about those recipients if the Data Subject requests it.

The exercise of the 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