

Reply Neurons – Privacy Notice (beta)

Reply S.p.A. (“**Reply**,” “**we**,” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this Privacy Notice (“**Privacy Notice**”). This Privacy Notice describes the information we collect and process related to the Reply Neurons platform (“**the Platform**”) and what choices you have with respect to the information.

The Platform is designed to enhance users’ productivity and assist them with recurrent tasks. Users can create an agent tailored to their needs and interact with it, and decide whether to share their information in real-time with the Reply community. Moreover, users can chat with the already available agents, whether they are public or shared with them by other users.

This Privacy Notice applies to all users of the Platform.

1. Purposes, Legal basis and Data Retention

We handle the personal information you provide and any data generated through your interactions with the Platform, such as: your name and user ID, the email of users you will share an agent with, your conversation history and feedbacks.

The personal information you submit to us will be used to:

- Allow you to access and use the Platform, e.g. login to the Platform, create an agent, chat with it, share the agent/chat with other users, etc.
- Create the agent knowledge and use it for retrieved augmented generation (RAG) functionalities, e.g. with chat conversations and uploaded files;
- Ensure the proper functionality of the Platform, evaluate your feedbacks, and troubleshoot technical issues;
- Fulfil compliance with law obligations;
- Pursue a legitimate interest of Reply, when necessary, e.g. for defending against potential legal claims or trial before any competent authority.

The legal basis for the processing of your personal data for such purposes is your acceptance of the Platform Terms&Conditions.

Your personal data will be kept by Reply for as long as: i) it is needed to provide the Platform services; ii) until you delete it or request to delete it.

2. Processing method and Cookies

For the purposes above described, we will electronically process your personal information. We make use of reasonable technical and organizational security measures and safeguards that are designed to help protect the data that we collect, use, and retain.

The Platform only uses technical cookies.

3. Data Recipients and Data Transfers

In connection with the purposes outlined in the section 1 above, your personal information will be processed by third parties enabling the technical functionalities of the Platform, i.e.:

- OpenAI, L.L.C. (“OpenAI”), which provides some of the LLM models used within the Platform. Please note that your personal data is not used to train OpenAI models.
- Amazon Web Services EMEA SARL, which is the cloud provider hosting the Platform and which also provides some of the LLM models used within the Platform. The Platform is hosted within the EU. Please note that your personal data is not used to train these LLM models.
- Google Ireland Limited which provides some of the LLM models used within the Platform. Please note that your personal data is not used to train these LLM models.

- Individuals or legal entities appointed by Reply to perform technical interventions, repairs, routine and maintenance, service restoration and updating, consultants, service providers, vendors entrusted to pursue the purposes outlined in the section 1 above;

Additionally, Your data may be shared with competent governmental and public authorities, as necessary to comply with legal or regulatory obligations or requests.

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

In the event that your personal data is transferred by Reply outside the EEA/UK to a country that does not provide an adequate level of protection of personal data, Reply will take measures to ensure that your personal data is adequately protected in accordance with the applicable transfer mechanisms endorsed by competent Authorities (e.g. standard contractual clauses adopted by the European Commission).

4. Data subjects' rights

You have the right to require the access to your personal data and, where the conditions are met, to require the amendment or erasure of the same or restriction of the processing that refer to you, or to oppose to the processing. Where the conditions are met, you have the right to data portability. For the abovementioned communications, you may use the contact details reported in section 7 below. You have the right to lodge a complaint to the responsible Supervisory Authority.

5. Data Controller and Data Protection Officer

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

The contact details of the Data Protection Officers are:

- Germany DPO: dpo.de@reply.de
- Italy DPO: dpo.it@reply.it
- UK DPO: dpo.uk@reply.com

6. Updates to this Privacy Notice

We may make changes to this Privacy Notice from time to time. The “Last Update” at the top of this page shows when this Privacy Notice was last revised. Any changes will become effective when we post the revised Privacy Notice on neurons.reply.com

7. Contact Us

If you have any comments or questions regarding this Privacy Notice or our data handling practices, please contact us at: neurons.privacy@reply.com