



# Cookie Policy

Cookie and Tracking Technologies Notice

*ISMS\_MPO\_001-1.0 Cookie Policy*

## CONTACTS

COMPANY	NAME	ROLE	EMAIL ADDRESS	PHONE
SORINT.SEC	Marco Battaglia	General Manager	marco.battaglia@sec.sorint.it	+39 345 0215949

## DOCUMENT REVIEW

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# SUMMARY

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## 1 PURPOSE

The main purpose of this notice is to enable the user to clearly and comprehensively understand:

- which types of cookies and similar technologies are used by our website;
- for which technical, statistical, or personalization purposes they are employed;
- which data may be collected through these tools and how such data is processed;
- how consent is managed through a dedicated platform (CMP);
- which rights the user is entitled to in relation to cookies and related technologies;
- which security and compliance measures are adopted by the Data Controller.

This Cookie Policy complements the Privacy Policy and represents a key element in our approach to security, transparency, and data protection within our digital infrastructure.

## 2 REGULATORY REFERENCES

The use of cookies complies with the main international regulatory frameworks on privacy, data protection, security, and online tracking, including:

### European Union and United Kingdom

Regulation (EU) 2016/679 (GDPR)

ePrivacy Directive 2002/58/EC, as amended (“Cookie Law”)

### International data transfers

Standard Contractual Clauses (SCCs) adopted by the European Commission

Supplementary measures required by case law following the Schrems II judgment

In accordance with these regulations, the website uses cookies only where a valid legal basis exists and adopts technical, organisational, and security measures proportionate to the associated risks.

## 3 GENERAL INFORMATIONS

This Cookie Policy describes how the Sorint.SEC website uses cookies and similar technologies to collect and process information when the user browses our pages.

The use of cookies complies with the main applicable regulatory frameworks, including the EU GDPR, UK GDPR, the ePrivacy/Cookie Law, relevant U.S. regulations, the Swiss FADP, and principles derived from Whistleblowing legislation.

### 3.1 What Cookies are

Cookies are small text files that websites store on the user’s device in order to ensure the proper functioning of the website, improve the browsing experience, analyse traffic, and personalise content or advertisements.

In a complex and dynamic digital environment such as that of cybersecurity, our platform requires tools that ensure:

- proper functioning of web pages and active defence systems;
- delivery of reliable and secure services;
- monitoring of website performance and visibility over user interactions;
- protection against anomalous traffic, malicious bots, and automated activities;
- personalisation of the user experience, where authorised;
- assessment of content effectiveness and continuous improvement of our services.

Cookies are a fundamental component of our infrastructure; however, users always retain full control over their activation.

### 3.2 Types of cookies used

#### a) Necessary Cookies

These cookies are essential for the operation of the website and enable core functionalities, such as maintaining secure sessions; protection against automated attacks (e.g. CAPTCHA, bot detection); load balancing and service continuity; and management of consent-related preferences.

These cookies are enabled by default as they are indispensable for system security and stability. They do not require user consent.

#### b) Preference Cookies

These cookies allow the website to store settings that personalise the user experience, such as preferred language, display settings, or customised user interface elements. Their use requires consent, as they are not technically essential.

Example: **pll\_language** (duration: 12 months).

### c) Statistical (Analytics) Cookies

These cookies collect aggregated or pseudonymised information about user interactions with the website, in order to improve its structure and functionality. They use advanced tools, including Google Analytics, to understand: how website pages are navigated, which content is most useful, and how to optimise performance, loading times, and stability.

Analytics are performed in aggregated or pseudonymised form and focus on: pages visited, time spent, approximate geographic origin, and interactions with content and forms.

Analytical cookies are installed only with prior user consent.

### d) Marketing Cookies

These cookies track visitors across websites in order to display relevant and personalised advertisements. In certain areas of the website, third-party content (e.g. videos, advanced contact forms, advertising tools) may be integrated and may use cookies for advertising or remarketing purposes.

This category is not enabled without explicit consent.

Real examples: Meta (`_fbp`, Facebook), LinkedIn (`bcookie`, `lidc`), YouTube (`VISITOR_INFO1_LIVE`, `YSC`, various IndexedDB entries).

### e) Unclassified Cookies

Cookies detected by the system that are still under assessment or added by third-party services not yet fully mapped. They are regularly monitored and classified.

## 3.3 Technologies similar to cookies

In addition to traditional cookies, the website may use:

- **local storage**, to retain technical configurations and session settings;
- **session storage**, useful for temporary navigation;
- **IndexedDB**, adopted by certain embedded services (e.g., YouTube);
- **tracking pixels**, used for security and analytics purposes.

These technologies are not activated without a valid legal basis and without appropriate security measures.

## 3.4. Legal basis for the use of cookies

**Necessary cookies** → legitimate interest of the Data Controller and technical necessity of the website

**Preference, statistical, and marketing cookies** → freely given, explicit, and informed consent

Consent can be withdrawn at any time.

## 4. CONSENT MANAGEMENT AND CMP

Consent management is handled through a professional Consent Management Platform: **lubenda**. The platform provides: a cookie banner compliant with European and international regulations; management and documented recording of expressed consent preferences; periodic scanning of the technologies present on the website and updates to the cookie declaration; automatic updates reflecting regulatory changes; and integration with a dynamic cookie statement.

Users may modify or withdraw their consent at any time through the dedicated lubenda panel available on every page of the website or via the link provided in the website footer.

## 5. DATA COLLECTION THROUGH FORMS FOR CONTENT DOWNLOAD

Certain sections of the website allow users to download PDF documents (white papers, reports, studies, technical materials).

Access to downloads requires completion of a form that collects personal data for the purposes of: managing the request; carrying out commercial or informational follow-up activities, where appropriate consent has been provided; and measuring interest in the content offered.

Data collection through these forms does not involve the installation of additional cookies, but it may interact with any active marketing or statistical cookies, which may record that a download has occurred.

## 6. ADVANCED USE OF GOOGLE ANALYTICS

Google Analytics is configured to collect technical data useful for security, performance, and user experience optimization.

Among the main cookies used:

- **\_ga** – maximum duration 24 months
- **ga#** – maximum duration 24 months

Google may transfer data outside the EU. In such cases, it applies:

- Standard Contractual Clauses (SCCs)
- supplementary technical measures
- pseudonymization processes and reduction of identifiability

Their use depends on the user's consent.

## 7. DATA TRANSFER OUTSIDE THE EU

The use of third-party cookies (Google, Meta, LinkedIn, Microsoft, HubSpot, YouTube) may result in data transfers to countries outside the EU. Such transfers are carried out through Standard Contractual Clauses (SCCs) and other security measures implemented by the providers, in line with the Privacy Policy.

## 8. COOKIE DURATION

The effective durations of cookies installed on the website are as follows:

- **Technical cookies** → session-based up to 1 year, with some persistent cookies
- **Preference cookies** → approximately 12 months
- **Analytics cookies** → up to approximately 13 months, in line with browser limitations
- **Marketing cookies** → up to approximately 13 months, in line with browser limitations

## 9. USER RIGHTS

Users may exercise all rights provided under applicable regulations (access, rectification, erasure, restriction, objection, portability, and withdrawal of consent).

The procedures for exercising these rights are described in the Privacy Policy.

## 10. DATA CONTROLLER

**Sorint.SEC**

Via Zanica, 17 | Grassobbio (BG)

Email: [info@sec.sorint.com](mailto:info@sec.sorint.com)

**Data Protection Officer**

Rossella Piazzalunga

Email: [dpo@sorint.com](mailto:dpo@sorint.com)

## 12. UPDATES TO THIS COOKIE POLICY

This Cookie Policy may be updated for regulatory or technical reasons.

You are invited to consult this page periodically.

## DOCUMENT INFORMATION

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Sorint.SEC S.r.l. Società 51% Controllata da Sorint.Lab S.p.A.  
Sede Legale: Via Zanica, 17 – 24050 Grassobbio (Bg), Italy  
Sede Operativa: Via Dell'Artigianato – Osio Sotto, 24046 (Bergamo), Italy  
COD. FISC., N. REG. IMPR. BG 04010360164, PI 04010360164  
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Legale Rappresentante e Amministratore Unico: Luca Pedrazzini  
Società Soggetta a Direzione e Coordinamento di Sorint.Lab S.P.A.  
Phone: +39 035 0510401  
<https://sorintsec.ai>