



# Privacy Policy

Management of Privacy and Data Collected on the  
Company Website

*ISMS\_MPO\_001-1.0 Privacy Policy*

# SUMMARY

- 1 Purpose ..... 3**
- 2 Scope of Application ..... 3**
- 3 Regulatory References ..... 4**
  - 3.1 Applicable Documents..... 4
  - 3.2 Reference Documents ..... 4
- 4 Provisions ..... 4**
  - 4.1 Data Processing Location ..... 4
  - 4.2 Privacy Policy for Website Visitors..... 4
  - 4.3 Personal Data and Personal Data Processing..... 4
  - 4.4 Types of Data Processed and Purposes of Processing..... 5
    - 4.4.1 Browsing Data ..... 5
    - 4.4.2 Data Voluntarily Provided by Users ..... 5
    - 4.4.3 Cookies ..... 5

The website uses cookies and similar technologies to ensure proper page functionality, improve browsing, ensure security and support the delivery of services. Such tools may be installed by Sorint.SEC or by authorized third-party providers. 5
  - 4.5 Data Provided by the Data Subject..... 5
  - 4.6 Purposes of Using Personal Data ..... 6
  - 4.7 Personal Data Processing: Mandatory Consent ..... 6
  - 4.8 Processing methods and storage ..... 6
  - 4.9 Information collection..... 7
  - 4.10 Rights of Data Subjects ..... 7
  - 4.11 Right to Request Information ..... 7
  - 4.12 Right of Rectification and Objection ..... 7
  - 4.13 Contacts..... 7
  - 4.14 Changes to This Policy ..... 8
- 5 DOCUMENT INFORMATION ..... 9**

## 1 Purpose

This document aims to explain how Sorint.SEC manages its privacy policy. The procedures described apply to all communications, both internal to the company and with external third parties, as outlined in the following sections.

## 2 Scope of Application

The policy applies to the area defined by the Integrated Management System during normal business activities. Its scope concerns Sorint.SEC.

## 3 Regulatory References

### 3.1 Applicable Documents

For consultation of the applicable documents, please refer to the Register of Legal Requirements and review the supporting documentation related to ISO/IEC 27001:2022.

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## 4 Provisions

When a user visits this website, some personal information may be collected. The processing of such data is entrusted to **Sorint.SEC**, represented by its legal representative, with registered office at via Zanica, 17 - 24050 Grassobbio (BG).

Within the organization, data are processed by authorized employees who operate in accordance with the internal instructions and procedures in place. **Sorint.Lab** acts as **Data Processor** for specific centralized services, such as the **DPO role**.

### 4.1 Data Processing Location

The processing of data related to the website <https://sorintsec.ai/> takes place at the operational headquarters of **Sorint.SEC**, located at **Via dell'Artigianato SNC – Osio Sotto (BG) 24046**.

The processing of data related to the website <https://sorintsec.ai/> is carried out by the **Data Controller** at the operational headquarters of **Sorint.SEC**, located at **Via dell'Artigianato SNC – Osio Sotto (BG) 24046**. Processing is performed exclusively by authorized technical personnel or, where necessary, by persons in charge of maintenance activities. No data collected through the website are disclosed or shared (Art. 90 GDPR). Personal information provided by users for the purpose of obtaining informational material is used solely to provide the requested service and may be communicated to third parties only when strictly necessary for that purpose (Art. 3 GDPR).

### 4.2 Privacy Policy for Website Visitors

This policy aims to describe the methods used to manage the website with regard to the processing of personal data of users/visitors who browse it.

This notice is also provided pursuant to **Article 13 of Legislative Decree 196/03 – Personal Data Protection Code**, to those who access the company websites of **SORINT** and use the related web services starting from the address <https://sorintsec.ai/>.

### 4.3 Personal Data and Personal Data Processing

The processing of personal data means any operation or set of operations, performed also without the use of electronic tools, concerning activities such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data, regardless of whether or not the data are stored in a filing system.

## 4.4 Types of Data Processed and Purposes of Processing

### 4.4.1 Browsing Data

The IT systems and software applications supporting the operation of the website <https://sorintsec.ai/> may, during their normal operation, automatically collect certain personal data whose transmission is implicit in the use of Internet communication protocols. Such data are not collected for the purpose of identifying specific individuals; however, due to their inherent characteristics, they may allow the identification of users through processing activities or correlation with information held by third parties.

In certain sections of the website, users may access the download of PDF documents (white papers, reports, technical materials) upon completion of a form. The completion of such forms entails the collection of personal data necessary for handling the request and, where applicable, for subsequent informational or commercial activities. This lead data collection does not involve the installation of additional cookies, but it may interact with any existing statistical or marketing cookies, solely recording that a download has been completed, as described in the Cookie Policy.

The activities carried out by **Sorint.SEC** are based on strict principles of fairness and protection of confidentiality. For this reason, the methods of data collection and storage are strictly related to the use of the website and the services offered, ensuring processing in compliance with the highest standards of protection.

### 4.4.2 Data Voluntarily Provided by Users

Where users transmit personal data in order to access specific services, apply for open job positions or subscribe to the newsletter dedicated to Threat Hunting activities, **Sorint.SEC** will acquire the sender's address and any additional personal information provided. Such data will be used exclusively to process the received request. The personal data provided by users may be communicated to third parties only where such communication is strictly necessary to fulfil the requests made by the users themselves.

### 4.4.3 Cookies

The website uses cookies and similar technologies to ensure proper page functionality, improve browsing, ensure security and support the delivery of services. Such tools may be installed by Sorint.SEC or by authorized third-party providers.

Necessary technical cookies and session cookies are used; these are deleted upon browser closure and are intended to manage temporary identifiers and ensure stable and secure navigation. These cookies do not allow direct user identification nor profiling activities.

The website may also use similar technologies (such as local storage or session storage) exclusively for technical and security purposes, without acquiring personally identifiable data.

Any preference, statistical or marketing cookies are activated only following the user's explicit consent through the Consent Management Platform (CMP), as described in the Cookie Policy.

## 4.5 Data Provided by the Data Subject

In addition to data collected automatically, information provided directly by the data subject is also processed. By way of example and not limited thereto, for natural persons this may include: first and last name, e-mail address, name of the company of affiliation and any additional data voluntarily communicated. Such information has in common the fact that it has been provided directly by the data subject and will be used exclusively for the purposes indicated in this Privacy Notice. The data subject may exercise at any

time the right to request rectification of their personal data or to object to their processing, within the limits provided by applicable legislation.

#### 4.6 Purposes of Using Personal Data

Personal data shall be used exclusively for purposes related to the operation of the website and the services offered through it. Where the data subject provides their data to subscribe to the weekly newsletter dedicated to Threat Hunting, **Sorint.SEC** may send e-mail communications or other messages relevant to the requested informational activities. The data subject may unsubscribe at any time, free of charge and with immediate effect, by sending an e-mail request to [cyberweek@sec.sorint.it](mailto:cyberweek@sec.sorint.it).

Personal data shall be processed for the following purposes:

1. Compliance with legal obligations: processing necessary to comply with legal or regulatory obligations or requests from competent authorities.
2. Management of newsletter subscription: sending informational communications related to cybersecurity and Threat Hunting topics and technical management of newsletter distribution.
3. Handling requests and contacts from interested users: management and response to information requests.
4. Management of applications and CVs received: evaluation of professional profiles and retention of CVs for a limited period for potential compatible opportunities.

#### 4.7 Personal Data Processing: Mandatory Consent

The processing of personal data may take place only following the data subject's consent, which must be freely given, informed, specific and provided in written form. The data subject is free to decide whether or not to provide the requested data.

Consent to the processing of personal data is mandatory for all the activities listed above.

Therefore, the legal basis is the **Performance of a Contract**: failure to provide data, or the absence, incompleteness or inaccuracy of such information, may prevent the provision of the requested services.

Failure to consent for the purposes referred to in points 2, 3 and 4 will result in the inability to fulfil the related requests. The data subject may also withdraw consent to receive the newsletter at any time by following the procedure indicated above.

#### 4.8 Processing methods and storage

Personal data are processed using IT tools, telematic means and automated systems, including profiling processes pursuant to Article 22 of the GDPR, also on the basis of identifying data such as personal details. Processing is carried out in compliance with the security measures required by applicable legislation and according to logic strictly related to the pursued purposes.

Appropriate technical and organizational measures are adopted to prevent data loss, unlawful or unauthorized use and unauthorized access. Retention periods are determined according to the purposes of the processing.

**Sorint.SEC** retains and uses personal data exclusively for the period necessary to fulfil the purposes for which they were collected, in compliance with applicable legal and regulatory obligations.

## 4.9 Information collection

One of our fundamental principles is the commitment to ensuring data processing based on the utmost care and confidentiality. Personal data shall under no circumstances be transferred or sold to third parties. Any communication to external parties may occur only where imposed by legal obligations or expressly permitted by applicable legislation, and always in compliance with the required security measures and safeguards. Any third-party recipients shall be required to process data solely for the related purposes and in compliance with applicable personal data protection regulations.

## 4.10 Rights of Data Subjects

**Sorint.SEC** informs the data subject that, pursuant to Article 7 of Legislative Decree 196/2003 and Regulation (EU) 2016/679, it is possible at any time to request confirmation of the existence of personal data concerning them, access their content and origin, understand the criteria applied to the processing, verify their accuracy or request their integration, update or rectification. The data subject may also request erasure, anonymization or blocking of data processed in violation of the law, as well as object to processing for legitimate reasons. With regard to processing related to newsletter distribution, consent may be withdrawn at any time and the right to object may always be exercised.

To exercise the rights indicated above, the data subject may submit a request to the dedicated address: **dpo@sorint.com**.

## 4.11 Right to Request Information

The data subject may at any time request information regarding their stored personal data, their origin, the entities to whom they may be communicated and the purposes of processing. To obtain such information, it is possible to contact us at the e-mail address: **dpo@sorint.com**. Any holder of personal data also has the right, at any time, to request confirmation of the existence or non-existence of such data, to know their content and origin, to verify their accuracy or request their integration or update, pursuant to Article 7 of Legislative Decree 196/03 and Regulation (EU) 2016/679.

## 4.12 Right of Rectification and Objection

Pursuant to Article 21 of the GDPR, the data subject has the right to object, for legitimate reasons, to the processing of personal data concerning them, as well as to request erasure, anonymization or blocking of data processed unlawfully. Communications sent by **Sorint.SEC**, such as newsletters, include the possibility to unsubscribe at any time using the relevant method indicated above.

If the data subject wishes to withdraw previously granted consent, they may do so at any time by sending a communication to **dpo@sorint.com**.

## 4.13 Contacts

The Data Controller is:

**SORINT.SEC**

Operational headquarters: Via dell'Artigianato SNC – 24046 Osio Sotto (BG)

Email: **dpo@sorint.com**

#### **4.14 Changes to This Policy**

Sorint.SEC fully embraces the fundamental principles of personal data protection and considers their safeguarding an essential and natural commitment.

For this reason, our policies undergo regular reviews to ensure accuracy, clarity, accessibility on our website, and full compliance with current legal requirements.

This Privacy Notice may be updated over time to reflect technological evolution, new opportunities offered by the web, or regulatory adjustments.

In any case, changes will never limit the rights granted to the data subject without their explicit consent.

## 5 DOCUMENT INFORMATION

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