

# INFORMATIVA AL TRATTAMENTO DEI DATI PERSONALI

The Data controller for data processing carried out through the Site is Sokrate sos srl , which can be reached at the e-mail address [info@sokratesos.com](mailto:info@sokratesos.com) and via standard mail at Sokrate sos srl , Strada di Cerchiaia, nr. 74, ZIP CODE 53100 Siena (SI).

This document has been drafted to allow you to understand our privacy policy, to comprehend:

- how your personal information is managed when you use our website
- how to provide informed consent for the processing of your personal data

## Browsing Data

The IT systems and software procedures used to operate the Site, acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects; however, due to its nature, it could allow the identification of users through processing and association with data held by third parties. While browsing the Site, certain technical data is automatically collected, including IP addresses, domain names of the devices used, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, method of submission, size of the file obtained in response, status code of the server's response (e.g., success, error), and other parameters related to the user's operating system and computing environment.

During its use, the Application autonomously collects trackers and usage data, either directly or through third parties.

This data is processed exclusively for anonymous statistical purposes, to monitor/control the proper functioning of the Site and of the Application and to identify any anomalies or abuses. The Data is deleted immediately after processing.

The data may be processed to determine liability in the event of suspected cyber crimes affecting the website or third parties. Except for this circumstance, at present, web contact data is not retained for more than seven days.

## Data voluntarily provided by the data subject

When using the services of the Site, there may be processing of personal data of third parties that you provide. In such cases, you act as an independent data controller, assuming all obligations and responsibilities provided by applicable law. Therefore, you release the Data Controller from any dispute, claim, or compensation request arising from the processing of such data in violation of applicable regulations.

In any case, if you provide or process personal data of third parties through the Site, you guarantee that you have previously obtained the consent of the data subject for the processing, assuming all related responsibilities.

## Cookies

The cookies sent by the Site are described in detail in the Cookie Policy, which you can find directly in the Cookie Policy section.

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## Purpose of processing

The processing we intend to carry out, upon your specific consent where necessary, has the following purposes:

- a) to allow browsing of the Site.
- b) to respond to specific requests submitted to our organization.
- c) to assess the cyber security risk if you have completed the 'cyber security risk assessment' questionnaire, and provide you with feedback and feedback on the matter
- d) to comply with any obligations provided by current laws, regulations, or community legislation, or to satisfy requests from authorities.
- e) To send you promotional and marketing messages, including newsletters. The Data Controller collects a single consent for these marketing purposes, as per the Italian Data Protection Authority's guidelines on promotional activities and spam (July 4, 2013). If you wish to stop your data from being used for marketing or to withdraw your consent, you can do so anytime by contacting the Data Controller at the details provided.

## The legal basis and mandatory nature

The legal basis for the processing of Personal Data for the purposes referred to in points (a-b -c) is:

Article 6(1)(b) of the EU Regulation as the processing is necessary for the provision of Services or for responding to requests from the data subject.

The legal basis for the processing of Personal Data for the purpose referred to in point (d) is:

Article 6(1)(c) of the EU Regulation, as it constitutes a legitimate processing of personal data to comply with a legal obligation.

Providing Personal Data for these purposes is optional, but failure to provide them would result in the inability to activate the Services offered by the Site

The legal basis for the processing of Personal Data for the purpose referred to in point (e) is:

Article 6.1.a) of the Regulation, meaning consent. Providing your Personal Data for the purpose mentioned in letter e) is optional; there are no consequences if you choose to refuse.

## Data Recipients

Your Personal Data may be shared, for the purposes mentioned above, with:

- entities that typically act as data processors under Article 28 of the EU Regulation, namely: entities with whom it is necessary to interact for the provision of Services (e.g., hosting providers).

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The list of data processors handling the data can be requested from the Data Controller.

- Subjects, entities, or authorities acting as autonomous data controllers, to whom it is mandatory to communicate your Personal Data under legal provisions or orders from authorities.
- persons authorized to process Personal Data under Article 29 of the Regulation necessary to carry out activities strictly related to the provision of Services, who have committed to confidentiality or have an adequate legal obligation of confidentiality (e.g., employees of Sokrate sos srl).

## Transfer of personal data

The Data Controller does not transfer your Personal Data outside the European Economic Area.

## Data retention

The Personal Data processed for the purposes specified above, will be retained for the time strictly necessary to achieve those same purposes, in compliance with the principles of storage limitation and data minimization. In any case the Data controller will process personal data only for as long as necessary to fulfill contractual obligations and legal requirements.

More information regarding storage period of personal data and the criteria used to determine that period can be requested by writing to the Data Controller.

## Rights of the data subjects

You have the right to access at any time the data that concerns you, pursuant to Articles 15-22 of the GDPR.

In particular, you may request the rectification, deletion, or limitation of the processing of that data in the cases provided for by Article 18 of the GDPR, revoke consent, obtain the portability of data concerning you in the cases provided for by Article 20 of the GDPR, as well as lodge a complaint with the competent supervisory authority pursuant to Article 77 of the GDPR (Italian Data Protection Authority).

You can submit a request to oppose the processing of your data under Article 21 of the GDPR, stating the reasons justifying the opposition: the Data Controller reserves the right to evaluate your request.

Requests should be submitted in writing to the Data Controller at the contact details provided above.

## Changes

The Data Controller, Sokrate sos srl reserves the right to modify or update the privacy policy, in part or entirely, including due to changes in applicable law. Any modifications will be communicated as soon as they are introduced, and they will become upon publication on the Site.

Therefore, Sokrate sos srl invites you to regularly visit this section to review the most recent and updated version of the privacy policy.