

# **Privacy Policy**

Last update: September 2025

#### 1. WHO WE ARE

Cyberating Srl, headquartered at Via Stalingrado 71/13, 40128 Bologna (Italy), as Data Controller, is responsible for the processing of personal data collected and processed through the "Cyberating" SaaS platform.

## 2. WHAT DATA WE PROCESS

- **2.1. Platform users' data (B2B clients)**: corporate e-mail address (used for creating login credentials) and communication with the user.
- **2.2. OSINT data collected from the web**: information on company domains and public IT infrastructure (e.g., vulnerabilities, DNS configurations, IP reputation, certificates, corporate e-mail addresses found in public data leaks).

We do not process sensitive data or special categories of personal data.

### 3. PURPOSES OF PROCESSING

- **3.1.** To enable users to access the platform and manage credentials.
- **3.2.** To provide clients with:
  - **3.2.1.** the Cyber risk rating service of monitored companies;
  - 3.2.2. a tool for managing their own IT vulnerabilities, enabling them to mitigate related risks;
  - 3.2.3. the ability to generate risk reports and conduct assessments.
- 3.3. To comply with legal and security obligations.

## 4. LEGAL BASES

- **4.1. Performance of the contract** (Art. 6.1.b GDPR) → to allow the use of the platform by users authorized by the client.
- **4.2.** Legitimate interest of the client (Art. 6.1.f GDPR)  $\rightarrow$  in allowing us to collect, process and store data from public sources (OSINT), in order to assess the cybersecurity of a domain/organization.
- **4.3.** Legal obligations (Art. 6.1.c GDPR).

#### 5. DATA RETENTION

- **5.1.** Personal data (user e-mail, any corporate e-mails collected from data leaks) are stored for the duration of the service subscription and subsequently deleted.
- **5.2.** Non-personal data (company domains, public IP addresses, DNS configurations, vulnerabilities, etc.) are retained for the provision of the service and for statistical purposes, in any case without identification of individuals.

## 6. HOW WE PROTECT DATA

**6.1.** Encrypted cloud databases hosted in data centers located in the EU.

- 6.2. Strong authentication and access logging.6.3. Security measures for SaaS collaboration tools.6.4. No data stored on-premises.
- 7. WITH WHOM WE SHARE DATA
  - **7.1.** Infrastructure and cloud service providers bound by contracts compliant with GDPR and the highest IT security standards.
  - 7.2. No transfer of personal data to third parties for commercial purposes.
- 8. DATA TRANSFERS OUTSIDE THE EU

At present, data are stored in data centers located within the European Economic Area (EEA).

## 9. USERS' RIGHTS

- 9.1. Users may exercise at any time the rights provided by the GDPR (Articles 15–22):
  - 9.1.1. access, rectification, erasure;
  - 9.1.2. restriction of processing and objection to processing;
  - 9.1.3. data portability;
  - 9.1.4. lodging a complaint with the Data Protection Authority.

For any request, please contact: privacy@cyberating.it

## 10. UPDATES

This notice may be updated. The latest version is always available within the platform.