

COOKIE POLICY

DATA CONTROLLER

Kirey Advisory S.r.l. with registered office in Viale Francesco Restelli 5, 20124 Milan, registered in the Milan Commercial Register, tax code and VAT 13507320961, R.E.A. 2727430, as the Data Controller of personal data (hereinafter, also the **"Data Controller"** or the **"Company"**), informs users of the website <https://www.kireyadvisory.com> hosted within the European Economic Area (hereinafter, the **"Website"**) in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 (**"GDPR"**), Italian Legislative Decree 196/2003, as subsequently amended, and the guidelines of the Privacy Guarantor (2021).

Kirey Advisory S.r.l. has also appointed a Data Protection Officer (DPO) who can be contacted at: dpo@kireygroup.com

DATA PROCESSING LOCATION

The processing of data related to this Website's web services takes place at the hosting service provider and is handled only by appropriately authorized technical staff.

CATEGORIES OF DATA PROCESSED

a) Browsing data-

The information systems and software procedures used to operate this Website acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

These data, which are not collected to be associated with identified interested parties, could allow - through processing and association with data held by third parties and, therefore, indirectly - to identify users. Such data includes:

- IP addresses or domain names of devices used by users;
- URI addresses of the resources requested;
- time-logs of the queries;
- request-to-server delivery methods
- sizes of files returned to the query;
- server response status codes;
- operating system and computer environment settings.

The above-mentioned data is used only to obtain anonymous statistics and to monitor the proper functioning of the Website, and is deleted immediately after its processing, except for the possible need to the investigate cybercrimes. The data is not retained for more than **7** days.

b) Data voluntarily provided by the user

The optional, explicit and voluntary sending of personal data through forms on the Website by the user implies the acquisition of the user's data, necessary for the provision of the requested service. Specific summary information will be progressively reported or displayed on the pages of the site prepared for services upon request.

COOKIE

Cookies are small text files that websites visited by users send to their endpoints (usually browsers), where they are stored and then transmitted back to the same sites on the next visit. They are mainly used in order to make websites work and operate more efficiently, as well as to provide information to the owners of the website itself.

Cookies can perform several functions, such as enabling efficient navigation, storing user preferences, and improving the browsing experience.

Cookies are distinguished into two main categories:

- **Technical cookies:** which are necessary for the proper functioning of the Website and do not require user consent.
- **Profiling cookies:** which are used to create user-related profiles and to send advertising messages in line with the preferences expressed and require the user's consent. Cookies are also distinguished into:

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Numero REA: MI - 2727430

T +39 02 78 62 52 00

pec@pec.kireyadvisory.it | www.kireyadvisory.com

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- **First-party cookies:** these are the cookies managed by the website owner. For these cookies, the disclosure obligation lies with the site owner. It is also the responsibility of the latter to indicate how to block the cookie, if any.
- **Third-party cookies:** these are cookies managed by a third party other than the website owner. For these cookies, the disclosure obligation and an indication of how to block the cookie, if any, is the responsibility of the third party, while the site owner is responsible for including on the site the link to the third party's site where these elements are available.

For any further information you can visit <http://www.allaboutcookies.org>

COOKIES USED BY THIS WEBSITE

The Website <https://www.kireyadvisory.com> uses technical cookies, including third-party cookies, to the extent strictly necessary to enable proper use and navigation of the Website. Technical session cookies are used exclusively to transmit session identifiers (consisting of random numbers generated by the server) necessary to ensure a safe and efficient exploration of the Website. These cookies do not allow in any way the collection of personal identifying data of the user and prevent the use of technologies potentially harmful to the confidentiality of navigation. In addition, with the user's explicit consent, the Website may also use profiling cookies in order to offer personalized content in line with the preferences expressed during navigation. If the user does not wish to receive any type of cookies other than those strictly necessary, he or she may refuse their installation by means of the "Reject" function available in the banner on the site. At any time, the user can change his/her preferences or manage the installation of cookies by clicking on "Cookie settings" present in the banner or footer of the site. For more information, you can consult our [Privacy Policy](#).

Below, in detail, are the cookies that can be installed

COOKIE TYPE	NAME	DESCRIPTION	RETENTION PERIOD	LINK
Necessary	Google Tag Manager	Google Tag Manager is a tag management service provided by Google LLC.		Link
	ak_bmsc	This cookie is used by Akamai to optimize site security by distinguishing between humans and bots. This cookie is set when customer is using Akamai as their CDN.	1 hour	Link
	bm_sv	This cookie is necessary for the Akamai cache function. A cache is used by the website to optimize the response time between the visitor and the website. The cache is usually stored on the visitor's browser. The users bandwidth results are stored within this cookie to help ensure the bandwidth test isn't repeated for the same user repeatedly for the Akamai cache functionality. This cookie is set when customer is using Akamai as their CDN.	1 hour	Link

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COOKIE TYPE	NAME	DESCRIPTION	RETENTION PERIOD	LINK
	ORA_FND_SESSION_<PO DNAME>_F	This is a session cookie set by Oracle Cloud or middleware for tracking web sessions and routing traffic to the right servers.	Session	Link
	ORA_FND_SESSION_<PO DNAME>_GSI_F	This is a session cookie set by Oracle Cloud or middleware for tracking web sessions and routing traffic to the right servers.	Session	Link
	ORA_FUSION_PREFS	This is a session cookie set by Oracle Cloud or middleware for tracking web sessions and routing traffic to the right servers.	Session	Link
	JSESSIONID	This is a session cookie set by Oracle Cloud or middleware for tracking web sessions and routing traffic to the right servers.	Session	Link
	OAMAuthnHintCookie	This is a session cookie set by Oracle Cloud or middleware for tracking web sessions and routing traffic to the right servers.	Session	Link
	OAM_REQ_0	This cookie is set by Oracle Cloud or middleware to track career site resource access. This cookie is secure and http only.	Session	Link
	OAM_REQ_COUNT	This cookie is set by Oracle Cloud or middleware to track career site resource access. This cookie is secure and http only.	Session	Link
	OAM_REQ_1	This cookie is set by Oracle Cloud or middleware to track career site resource access. This cookie is secure and http only.	Session	Link
	ECID-Context	This cookie indicates execution context for http calls between career site and core product.	Session	Link
	ORA_EVENT	This cookie is used for user tracking purposes.	Session	Link
	verificationToken	Stores the token needed for session persistence in the partner assessment flow.	4 hours	Link
	CX_<SITE_NUMBER>_cookieConsentEnabled	This cookie is used to store whether the cookie consent is enabled in the career site.	Session	Link

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COOKIE TYPE	NAME	DESCRIPTION	RETENTION PERIOD	LINK
Necessary -- Cloudflare	_cfuvid	Technical cookie set by Cloudflare to distinguish individual users who share the same IP address session.	Session	Link
Measurement – Google Analytics 4	_ga	Statistics on the number of users and interactions	2 years	Link
	ga*	Advanced statistics (sessions, events)	2 years	Link
	_gcl_au	Used by Google to test advertising effectiveness across websites.	3 months	Link
	CX_<SITE_NUMBER>_cookieAccept_functional	This cookie is used to store a candidate's choice for functional cookies.	90 days	Link
	CX_<SITE_NUMBER>_cookieAccept_analytical	This cookie is used to store the candidate's choice for Analytical and Performance cookies.	90 days	Link
	CX_<SITE_NUMBER>_cookieAccept_custom	This cookie is used to store the candidate's choice for custom category cookies.	90 days	Link
	CX_<SITE_NUMBER>_cookieDeclineAll	This cookie is used to store the candidate's choice to decline all cookie categories.	90 days	Link
	ORA_CX_USERID_FUNCTIONAL	This cookie is used to store candidate choice of favorite jobs and sign in authentication for returning candidate.	90 days	Link
	ORA_CX_USERID	This cookie is used for user tracking purposes. It holds the user ID.	90 days	Link
	ORA_CANDIDATE_NUMBER	This cookie is used for user tracking purposes. It holds the candidate number.	90 days	Link
	ORA_CX_SITE_LANG	This cookie is used to store the candidate language preference. Next time the candidate visits the career site that it will be loaded in the user preferred language.	90 days	Link

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COOKIE TYPE	NAME	DESCRIPTION	RETENTION PERIOD	LINK
	ORA_CX_DEVICEID	This cookie is used for the Keep Me Signed In feature. It's used to recognize the device used by the candidate to allow automated verification of candidate when Keep Me Signed In option was selected in the past on the same device. This cookie isn't tied to the cookie consent.	90 days	Link
	ORA_FPC	This cookie is used for user tracking purposes.	1 year	Link
Marketing - Hubspot CRM	__hmpl	It contains metadata regarding tracking events that HubSpot collects throughout the user's journey at HubSpot.	It expires at the end of the session	Link
	__hs_gpc_banner_dismiss	This cookie is used when the website uses a Notify consent banner type. It contains a boolean value of True.	6 months	Link
	__hssc	This cookie keeps track of a visitor's identity. It is passed to HubSpot on form submission and used when deduplicating contacts. It contains an opaque GUID to represent the current visitor.	30 min	Link
	__hssrc	Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser.	It expires at the end of the session	Link
	__hstc	The main cookie for tracking visitors. It contains the domain, hubspotutk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session).	2 months	Link
	hublytics_events_53	This browser storage entry is used by HubSpot Product to temporarily store tracking events created by HubSpot Product until they get dispatched over the network.	It expires at the end of the session	Link
	hubspotutk	This cookie keeps track of a visitor's identity. It is passed to HubSpot on form submission and used when deduplicating contacts. It contains an opaque GUID to represent the current visitor.	2 months	Link

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	messagesUtk	This cookie is used to recognize visitors who chat with you via the chatflows tool. If the visitor leaves your site before they're added as a contact, they will have this cookie associated with their browser.	2 months	Link
Marketing - LinkedIn	AnalyticsSyncHistory	Used to store information about the time a sync took place with the lms_analytics cookie	1 month	Link
	JSESSIONID	Used for Cross Site Request Forgery (CSRF) protection and URL signature validation.	It expires at the end of the session	Link
	UserMatchHistory	LinkedIn Ads ID syncing	1 month	Link
	bcookie	Browser Identifier cookie to uniquely identify devices accessing LinkedIn to detect abuse on the platform	1 year	Link
	lang	Used to remember a user's language setting to ensure LinkedIn.com displays in the language selected by the user in their settings.	It expires at the end of the session	Link
	li_gc	Used to store consent of guests regarding the use of cookies for non-essential purposes	7 months	Link
	lfdc	To facilitate data center selection	1 day	Link
	lms_ads	Used to identify LinkedIn Members off LinkedIn for advertising	1 month	Link
	lms_analytics	Used to identify LinkedIn Members off LinkedIn for analytics	1 month	Link
	sdui_ver	Used to ensure users' browsers continue using a supported version of the service to maintain consistent performance during updates	1 day	Link

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COOKIE MANAGEMENT

Kirey Advisory S.r.l., would like to remind you that the total or partial disabling of so-called technical cookies may compromise the use of the Website functionalities.

When the user accesses the site, he/she displays a cookie banner that complies with the 2021 Guidelines of the Italian Data Protection Authority ("Garante per la Protezione dei Dati Personali"), through which he/she can:

- accept all cookies;
- reject all the non-technical cookies;
- manage his/her preferences.

Consent is recorded for 6 months and is always revocable through the Cookie Management Center accessible at the bottom of each page of the Website.

It is also possible for the user to change security settings directly from their browser:

- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=it>
- **Firefox:** <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- **Internet Explorer:** <http://windows.microsoft.com/it-it/internet-explorer/delete-manage-cookies>
- **Opera:** <http://help.opera.com/Windows/10.00/it/cookies.html>
- **Safari:** http://support.apple.com/kb/HT1677?viewlocale=it_IT

DATA PROVISION OPTIONALITY

Except for browsing data, the user is free to provide personal data contained in the request forms or otherwise indicated in contacts with the Data Controller to request the sending of informative material or other communications. Failure to provide data may make it impossible to obtain the service. In case of provision of data through different forms and / or sessions will be provided appropriate information.

DATA PROCESSING METHODS

Personal data are processed by automated means for the time strictly necessary to achieve the purposes for which they were collected. The duration of the cookies is indicated, for each of them, in the summary table provided above.

DATA SHARING, COMMUNICATION AND DISCLOSURE

Collected data may be transferred or disclosed to authorized third parties (list of names available from the Data Controller) only for purposes related to the provision of web services.

Data will not be disclosed to other parties or released, unless explicitly authorized or required by law.

In this regard, personal data could be shared with third parties, but only and exclusively in case:

- an explicit user's consent to share the data with third parties;
- a need to share information with third parties in order to provide the requested service;
- the disclosure is necessary to comply with requests from the Judicial or Public Security Authorities. No data from the web service is disclosed.

RIGHTS OF DATA SUBJECTS

Users may exercise his/her rights under Articles 15-22 of the GDPR, which include:

- access, rectification, deletion;
- limitation of processing;
- objection to processing;
- complaint to the Italian Data Protection Authority (www.garanteprivacy.it).

In order to exercise your rights, you may use the following e-mail address: privacy@kireygroup.com. Kirey Advisory S.r.l makes the privacy policy available at the following [link](#).

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CHANGES TO THIS POLICY

Kirey Advisory S.r.l, regularly reviews its privacy and security policies and, if necessary, revises them in relation to regulatory, organizational or technological evolution dictated changes. If the policies change, the new version will be posted on this page of the website.

Last version: **June 2026**

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