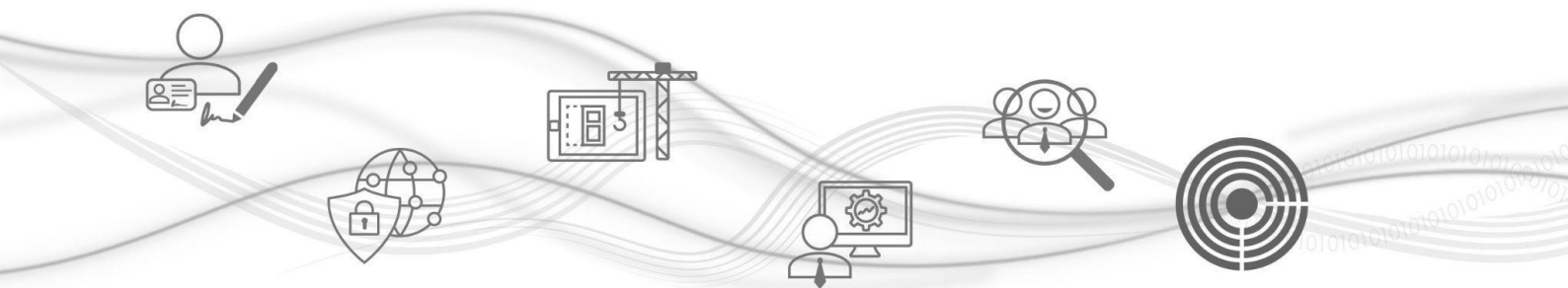




IMS Company Policy

Information quality and security



Category	IMS Policy	Document Code	NAM-SGI-PO	Namirial S.p.A.
Written by	Valentina Gallucci	Privacy Note	Audience	The Legal Representative
Verified by	Luigi Enrico Tomasini	Version	2.1	Massimiliano Pellegrini
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History of changes

Date	Version	Reason for the change
10/09/2026	2.1	Formal updating of the document and substantial amendments to chapter 1 in relation to certifications and accreditations
02/10/2025	2.0	Updating the list of certifications and declarations
11/09/2023	1.0	First draft



1. Brief description of Namirial S.p.A.

Namirial S.p.A. is an Italian multinational Information Technology company with registered office in Senigallia (Ancona), active in the Digital Transaction Management (DTM) sector. Founded in 2000, the company develops solutions and technologies for digital identity verification, electronic signatures, electronic invoicing and secure management of digital document flows. With over 1,000 employees and offices distributed throughout the country and in several European and non-European countries, Namirial today serves a clientele ranging from professionals and SMEs to large enterprise organizations, public administrations and operators of regulated markets, to whom it provides high value-added digital services integrated into their respective business processes.

Namirial is a Qualified Trust Service Provider (QTSP) pursuant to the eIDAS Regulation (EU no. 910/2014) and is registered in the public list of qualified trust service providers held by AgID – Agency for Digital Italy. The portfolio of trust services has been consolidated over time through successive qualifications: from the management of Certified Electronic Mail (since 2007) and the compliant digital storage service (since 2014), to qualified electronic signature (since 2010), up to accreditation as an Identity Provider within the SPID Public Digital Identity System (since 2017). These are now flanked by advanced digital onboarding and remote identity verification solutions, provided in API-first mode for the benefit of customers who integrate Namirial services into their operational flows.

The regulatory framework is significantly evolving: Regulation (EU) 2024/1183 (eIDAS 2), together with the Architecture and Reference Framework (ARF) of the EUDI Wallet, introduces new requirements on European digital identity and expands the scope of qualified trust services. Namirial actively follows these developments, including through participation in European pilot projects, with a view to the gradual adaptation of its services to the new regulatory framework.



Namirial S.p.A. is:



Qualified Trust Service Provider eIDAS

Namirial is QTSP according to the eIDAS definition for services:

- Issuance of the qualified certificate for electronic signature;
- Issuance of the qualified certificate for the electronic seal;
- Issuance of the qualified timestamp;
- Preservation of qualified signatures and qualified seals

Namirial is listed in the EU Trust Services Dashboard and is accredited by the Italian government as a trust service provider.

[Trust service providers active in Italy](#)

Certificate 910/2014 eIDAS - Qualified Trust Service Providers



Electronic Registered Delivery – PEC Manager

accredited by AgID and authorized to manage Certified Electronic Mail (PEC) mailboxes and domains, it has been providing the Postal Security service since 2007.

[List of PEC operators](#)



Electronic Identification – Identity Provider SPID

Namirial provides SPID digital identification trust services and is accredited by the Italian government according to the European eIDAS standards pursuant to:

- Prime Ministerial Decree 24/10/2014;
- Commission Implementing Regulation EU 2015/1502;
- Regulation (EU) 910/2014 eIDAS, art. 24 for the provision of trust services of Digital Identification.

[Accredited identity providers](#)

ETSI EN 319 401 certification





Long Term Archiving Provider -Soggetto Conservatore

in accordance with:

- Technical Rules pursuant to art. 71 of the Digital Administration Code;
- Regulation (EU) 910/2014 eIDAS, art. 24 for the provision of trust services of Conservation in accordance with the law.

Namirial has been providing the Long-Term Archiving service since 2014, it is qualified by Agid and the Cybersecurity Agency.

The service is SaaS qualified QC2 level by ACN and included in the Digital Infrastructure and Cloud Services Catalog.

[Qualified Conservators](#)

[Digital Infrastructure and Cloud Services Catalog - NamirialArchive](#)



UNI EN ISO 9001:2015 certified. Namirial has obtained the **Quality Management System** certificate issued by Bureau Veritas Italia S.p.A.



ISO/IEC 27001:2022 certified. Namirial has obtained the **Information Security Management System certificate integrated with the controls provided for by the ISO/IEC 27017:2015 and ISO/IEC 27018:2019 guidelines** issued by Bureau Veritas Italia S.p.A.



ISO 37001:2016 certified

Namirial has obtained the **Anti-bribery management systems** certificate issued by Bureau Veritas Italia S.p.A.



UNI PdR 125:2022 certified

Namirial has obtained the **Gender Equality Management System certificate** issued by Bureau Veritas Italia S.p.A.

ETSI TS 119 461 v2.1.1



Namirial is **ETSI TS 119 461 v2.1.1** certified with the **Namirial Onboarding platform**



Certified by Adobe. Since June 2013, Namirial has been a member of the AATL (Adobe Approved Trust List).

From 2023, Namirial has decided to expand its PKI infrastructure by implementing a second root Certification Authority. This CA, which complements without replacing the existing one, has been implemented in the server farm of **Uanataka**, already a qualified Certification Authority under the eIDAS regulation as well as a company of the Namirial group.



2. Objectives and aims pursued

Namirial, as part of its activities, has always paid particular attention to the following aspects:

- **quality** of the products offered and services provided to its customers;
- **security of the data and information** it manages.

Namirial considers information security to be a fundamental element both in relation to the design and development processes of technological solutions, and with respect to the provision of services.

These issues also have their own relevance both in terms of customer satisfaction and loyalty, and in the development of the operational strategies of its organizational system and the definition of growth and innovation objectives in the medium and long term.

With this in mind, Namirial's Management has, over time, implemented an Integrated Management System (Quality and Information Security), in compliance with **the UNI EN ISO 9001** and **ISO/IEC 27001** standards, aimed at ensuring that the products and/or services supplied are the result of processes developed in accordance with the criteria established by the Management System documentation, subjected to verification and certification by an internationally accredited third-party body¹.

Everything related to the management of products and/or services and data deserves to be safeguarded, defended and treated according to planned, accurate models capable of ensuring the continuity of company resources over time.

The need to have an Integrated Management System is linked to the need to respond promptly and effectively to the globalization of markets, the evolution of ICT systems and supporting technology.

Namirial's Integrated Management System is, therefore, the main tool:

- to demonstrate Namirial's ability to regularly provide products/services that comply with customer requirements and applicable legislative and regulatory requirements, so as to become an attractive partner also for medium-large companies that would allow it to continue in a positive growth trend;
- to ensure the security of the information managed in all company activities and in the services provided;

¹ Namirial certificates are publicly available on the dedicated page of the company website [Our Certifications - Namirial](#)



- to improve customer satisfaction.

In addition, this choice is also linked to the need to pursue:

- the effectiveness and efficiency of the processes for the creation of products/services, through adaptation to market demands, optimization of management times, cost reduction, minimization of environmental impacts, constant collaboration with suppliers and collaborators;
- credibility, trust on the part of stakeholders (including principals) in ensuring the confidentiality, integrity, availability and resilience of their information;
- compliance with laws, regulations and directives related to data protection;
- the reduction of economic and legal risks due to the loss of information relevant to business continuity and the interest of stakeholders;
- the ability to identify and pursue opportunities for improvement, strengthening the system's ability to respond effectively to market developments;
- awareness and participation at all levels of human resources in the process of continuous improvement, as well as their awareness in relation to the importance of safeguarding information, especially that considered critical for the protection of personal data and the company's business;
- the continuous search for the improvement of its processes, the corporate image and the pursuit of corporate objectives, for the achievement of which, the company management undertakes to provide all the necessary means and support, such as personnel and suitable infrastructures, trying to offer a working environment that stimulates the improvement of company performance.



3. Management Statement of Commitment

This document represents the commitment undertaken by the Company Management and disseminated and shared with all staff, aimed at ensuring the respect, evaluation and satisfaction of the unexpressed requests and needs of the customer as well as the protection of information, with particular reference to the following aspects:

- **Confidentiality:** ensuring that the information is accessible only to duly authorised persons and/or processes and that the information is not made available or disclosed to unauthorised persons or entities;
- **Integrity:** safeguarding the accuracy and completeness of the information and the methods used to process it, in order to prevent it from being modified and/or deleted either due to errors or voluntary actions, or as a result of malfunctions and/or damage to technological systems;
- **Availability:** ensure that authorized users have access to information and associated assets when they request it;
- **Resilience:** ensuring that the information systems that process the data have operational continuity aimed at coping with the probable adversity to systems and processes resulting from accidental and/or intentional events;
- **Privacy:** ensuring the protection of personal data in accordance with applicable legislation and the policies and procedures adopted by Namirial.

This Policy also supports an effective strategic, tactical and operational management model for corporate risks and opportunities, through which management systems can be structured, defined, updated and kept operational.

Last but not least, it intends to pay attention to all aspects of personal security and prevention and those relating to respect for the environment, as well as to all aspects relating to privacy, for the protection of personal data for which it has adopted a specific policy consistent with this one.

The company management is strongly committed to spreading and promoting awareness of the importance of information security within the organization.

The main tool to ensure the effectiveness and adequacy of the Integrated Management System is the commitment of top management, for this reason the CEO and Namirial's managers review the Integrated Management System as necessary, during the appropriate "management review".



During these reviews, the data, collected through measurement and monitoring activities, are analyzed and compared with the objectives and performance indicators, giving rise to the changes and/or improvements necessary to ensure that the Integrated Management System is suitable, adequate and effective.

The changes and/or improvements defined by top management concern:

- the objectives and performance indicators for the following year;
- the resources (human, material, economic and financial) necessary to achieve the objectives and maintain the compliance and effectiveness of the Integrated Management System;
- staff awareness and training programs, to ensure the correct application of the Integrated Management System;
- the internal audit programs, necessary for the verification of compliance and effectiveness of the Integrated Management System;
- the changes to the Integrated Management System, necessary to incorporate the organizational and evolutionary changes of Namirial;
- the continuous improvement of the Integrated Management System processes and information security controls, to improve their effectiveness and efficiency.

The results of the Management review constitute the reference for all the activities described in Namirial's Integrated Management System, ensuring consistency with the company's objectives, which are defined and updated periodically according to strategic and organizational needs.

This Policy is periodically reviewed as part of the Management Review, in order to verify its continued adequacy and consistency with the organization's guidelines.