Privacy assessment — audiolibri.org

Passive observation of the public page · 2026-11-16 04:22:58 UTC
Page observed: `https://audiolibri.org/`
Scan reference: `1e9172c3a41c`

B

conformant on the points observed

No finding of critical or high severity on the page observed.

On loading the page, with no interaction from the user, the site contacted **2 third parties**, all of which process data outside the European Economic Area.

No cookie and no write to the terminal on first visit.

The overall outcome is **B**: 3 findings, of which 0 critical and 0 high.

0	0	0	1	2
Critical	High	Medium	Low	Informational

Priority P1 **0** P2 **0** P3 **0** P4 **3** P5 **0**

Severity is how much the finding weighs in legal terms. **Priority** is the order in which to deal with it — severity corrected for the effort required, so that a high finding fixable in ten minutes comes before one that needs a supplier negotiation. P1 is the most urgent, P5 the least.

Page title	Audiolibri gratis in italiano — 2.800 titoli in streaming, senza registrazione | Audiolibri.org
Platform detected	not detected
Third parties contacted	2
Cookies on first visit	0
Terminal storage keys	0
Consent mechanism	none detected
Legal documents read	privacy, accessibility
Evidence digest	`c09a08748835f99d1d7f086cc61dd45beabe20375920203245da852c787c4abd`
Ruleset digest	`2c1582a40adcaafd8d101cc04ba3123cdafa87a9fabd3b1b569fd37b6845209c`

Work by owner

The owner is whoever holds the technical or organisational lever to close the finding, not whoever is legally accountable for the processing.

Owner	Findings	of which serious	quick wins	Areas
DPO / privacy	2	0	0	infrastructure, privacy-engineering, supply-chain
Security	1	0	0	application-security, supply-chain

Index of findings

#	Severity	Priority	Owner	Finding	Identifier
1	Low	P4	Security	No Content-Security-Policy	`PM-SEC-03`
2	Informational	P4	DPO / privacy	Technical provider outside the EEA: Cloudflare CDN / WAF (Cloudflare, Inc.)	`PM-TRF-02:cloudflare-cdn`
3	Informational	P4	DPO / privacy	Technical provider outside the EEA: GitHub Pages (GitHub, Inc. (Microsoft))	`PM-TRF-02:github-pages`

Findings in detail

1. No Content-Security-Policy

Low P4 · Owner: Security · involve: Engineering · confidence: observed

`PM-SEC-03`

No Content-Security-Policy is declared. Beyond the security angle, CSP is what makes the promise in the privacy notice *verifiable*: without explicit `connect-src` and `script-src`, any included script — even one introduced by mistake or by a supplier — can open a channel to an undeclared third party.

Legal references: GDPR Art. 32 — security of processing; GDPR Art. 25 — data protection by design and by default

Control mapping: GDPR: GDPR Art. 25 — data protection by design and by default, GDPR Art. 32 — security of processing · NIS2: NIS2 Directive (EU) 2022/2555 Art. 21(2)(e) — security in acquisition, development and maintenance, NIS2 Directive (EU) 2022/2555 Art. 21(2)(d) — supply chain security · ISO 27001: ISO/IEC 27001:2022 A.8.23 — web filtering, ISO/IEC 27001:2022 A.8.26 — application security requirements, ISO/IEC 27001:2022 A.8.28 — secure coding · SOC2: SOC 2 CC6.6 — logical access security measures against external threats, SOC 2 CC7.1 — detection of configuration changes and vulnerabilities

Evidence observed

Report-only policy served (enforces nothing)

```
default-src 'self'; script-src 'self' 'sha256-MGik3+GNup91ZWwmI0dkjMzUyWhqDx/D0JrQIHEnPOA=' 'sha256-yFwehGPXk8nzTLeHkzd0QTiwYo59le5Hiu9t4SqlJdc=' 'sha256-+IyAqQWbRS4+EWWlVg/ u7bHtojs1ponIRvS8G5NB0b8=' 'sha256-UjLs79H2dMN3rAe113FABrama8PSjQc5sOLH9/U/OoY=' 'sha256- Ey1Vit544AejKuLTkGh4Jw9rvKHr/OF/zCL
```

How to check this yourself

1. Run: `curl -sSI https://audiolibri.org/`.
2. Compare the headers present with those the finding expects (the complete list of observed headers is in the evidence).
3. Every check must be done in a clean window: a pre-existing cookie or consent changes what the site does and makes the comparison meaningless.

Remediation — medium effort

Adopt a CSP that lists the permitted destinations explicitly.

1. Start in observation only with `Content-Security-Policy-Report-Only` and collect the violations.
2. Consolidate `default-src 'self'` plus the destinations that are genuinely needed.
3. Move to enforcement; the policy then becomes the technical control that prevents undeclared transfers.

2. Technical provider outside the EEA: Cloudflare CDN / WAF (Cloudflare, Inc.)

Informational P4 · Owner: DPO / privacy · involve: Infrastructure · involve: Procurement · confidence: observed

`PM-TRF-02:cloudflare-cdn`

The service relies on Cloudflare CDN / WAF (Cloudflare, Inc., US), a provider needed to deliver the page: it requires no consent, but it remains a recipient of personal data outside the European Economic Area. This finding is informational and exists to keep the record of processing and the privacy notice aligned; it becomes a problem only if the provider is not declared or if the Art. 28 agreement is missing.

Legal references: GDPR Art. 13(1)(e) — recipients or categories of recipients; GDPR Art. 28 — processor; GDPR Arts. 44-49 — transfers of personal data to third countries

Control mapping: GDPR: GDPR Art. 13(1)(e) — recipients or categories of recipients, GDPR Art. 28 — processor, GDPR Arts. 44-49 — transfers of personal data to third countries · NIS2: NIS2 Directive (EU) 2022/2555 Art. 21(2)(d) — supply chain security · ISO 27001: ISO/IEC 27001:2022 A.5.19 — information security in supplier relationships, ISO/IEC 27001:2022 A.5.21 — managing information security in the ICT supply chain · ISO 27701: ISO/IEC 27701 7.2.6 — contracts with PII processors, ISO/IEC 27701 7.5.1 — identify basis for PII transfer between jurisdictions · SOC2: SOC 2 CC9.2 — vendor and business partner risk management

Evidence observed

Detected via
`response header`

Pages that contacted it
`https://audiolibri.org/`

Transfer
`outside the EEA`

Basis for the transfer
`EU-US Data Privacy Framework / Standard Contractual Clauses`

Named in the document
`privacy`

How to check this yourself

1. Run: `curl -sSI https://audiolibri.org/` and read the response headers.
2. The header that identifies the provider is reported in the evidence (`server`, `cf-ray`, `x-github-request-id`, ...).
3. Compare with the list of processors in the privacy notice.
4. Check whether the provider is named in https://audiolibri.org/privacy.html (text search in the page).
5. Every check must be done in a clean window: a pre-existing cookie or consent changes what the site does and makes the comparison meaningless.

Remediation — low effort

Necessary provider: nothing to remove, but it has to be declared.

1. List Cloudflare, Inc. among the processors in the privacy notice, with the purpose it serves.
2. State the transfer (outside the EEA) and the basis relied on, and keep a copy available.
3. Confirm the processing agreement under Art. 28 is signed and current.

3. Technical provider outside the EEA: GitHub Pages (GitHub, Inc. (Microsoft))

Informational P4 · Owner: DPO / privacy · involve: Infrastructure · involve: Procurement · confidence: observed

`PM-TRF-02:github-pages`

The service relies on GitHub Pages (GitHub, Inc. (Microsoft), US), a provider needed to deliver the page: it requires no consent, but it remains a recipient of personal data outside the European Economic Area. This finding is informational and exists to keep the record of processing and the privacy notice aligned; it becomes a problem only if the provider is not declared or if the Art. 28 agreement is missing.

Legal references: GDPR Art. 13(1)(e) — recipients or categories of recipients; GDPR Art. 28 — processor; GDPR Arts. 44-49 — transfers of personal data to third countries

Control mapping: GDPR: GDPR Art. 13(1)(e) — recipients or categories of recipients, GDPR Art. 28 — processor, GDPR Arts. 44-49 — transfers of personal data to third countries · NIS2: NIS2 Directive (EU) 2022/2555 Art. 21(2)(d) — supply chain security · ISO 27001: ISO/IEC 27001:2022 A.5.19 — information security in supplier relationships, ISO/IEC 27001:2022 A.5.21 — managing information security in the ICT supply chain · ISO 27701: ISO/IEC 27701 7.2.6 — contracts with PII processors, ISO/IEC 27701 7.5.1 — identify basis for PII transfer between jurisdictions · SOC2: SOC 2 CC9.2 — vendor and business partner risk management

Evidence observed

Detected via
`response header`

Pages that contacted it
`https://audiolibri.org/`

Transfer
`outside the EEA`

Basis for the transfer
`EU-US Data Privacy Framework`

Named in the document
`privacy`
`accessibility`

How to check this yourself

1. Run: `curl -sSI https://audiolibri.org/` and read the response headers.
2. The header that identifies the provider is reported in the evidence (`server`, `cf-ray`, `x-github-request-id`, ...).
3. Compare with the list of processors in the privacy notice.
4. Check whether the provider is named in https://audiolibri.org/privacy.html (text search in the page).
5. Every check must be done in a clean window: a pre-existing cookie or consent changes what the site does and makes the comparison meaningless.

Remediation — low effort

Necessary provider: nothing to remove, but it has to be declared.

1. List GitHub, Inc. (Microsoft) among the processors in the privacy notice, with the purpose it serves.
2. State the transfer (outside the EEA) and the basis relied on, and keep a copy available.
3. Confirm the processing agreement under Art. 28 is signed and current.

Recipients observed

Third parties that received data when the page loaded, in the shape a record of processing activities (Art. 30 GDPR) and a supplier register need them. "Declared" says whether the party is named in the legal documents that were read.

Service	Legal entity	Juris.	Transfer	Consent	Declared
Cloudflare CDN / WAF `response header`	Cloudflare, Inc.	US	outside the EEA EU–US Data Privacy Framework / Standard Contractual Clauses	strictly necessary	yes
GitHub Pages `response header`	GitHub, Inc. (Microsoft)	US	outside the EEA EU–US Data Privacy Framework	strictly necessary	yes

Impact assessment screening

A screening, never a determination. It counts the criteria visible from outside and names the ones that are not: a report that presented itself as complete would let someone conclude "no assessment needed" from evidence that never covered the question.

Criterion	State	What was observed
Evaluation or scoring, including profiling	—	
Automated decision-making with legal or similarly significant effect	Not assessable from outside — to be answered by the controller	
Systematic monitoring of data subjects	—	
Special categories, or data of a highly personal nature	Not assessable from outside — to be answered by the controller	
Processing on a large scale	Not assessable from outside — to be answered by the controller	
Matching or combining datasets	—	
Data concerning vulnerable data subjects	Not assessable from outside — to be answered by the controller	
Innovative use of new technology	—	
Processing that prevents data subjects from exercising a right or using a service	Not assessable from outside — to be answered by the controller	

Two or more criteria met usually calls for an assessment.

Transfers to assess

For every recipient outside the EEA, the questions a transfer impact assessment has to answer, pre-filled with what was observed. Where the knowledge base holds an equivalent, it is listed: the cheapest transfer impact assessment is the transfer you do not make.

Questions the assessment must answer

1. Which entity actually receives the data, and in which country is it established?
2. On what basis does the transfer rest, and is a copy of the instrument available?
3. Is the recipient subject to legislation permitting public authority access beyond what EU law would allow?
4. What supplementary measures apply — encryption, pseudonymisation, contractual and organisational?
5. Is the transfer necessary at all, or is an equivalent available inside the EEA?

Recipient	Country	Transfer basis	Data disclosed	Declared	Equivalents that would remove the transfer
Cloudflare CDN / WAF Cloudflare, Inc.	US	EU–US Data Privacy Framework / Standard Contractual Clauses	IP address, request metadata	yes	—

Recipient	Country	Transfer basis	Data disclosed	Declared	Equivalents that would remove the transfer
GitHub Pages GitHub, Inc. (Microsoft)	US	EU–US Data Privacy Framework	IP address, request metadata	yes	—

Full evidence

Pages observed

Pages are chosen deterministically — one per kind, then a leaf page, then the main navigation — so two scans of the same site remain comparable. Links are followed from the entry page only: a conformance check is not a crawl.

#	URL	Kind	Status	Requests	Cookies
1	`https://audiolibri.org/` `the page that was submitted`	entry page	200	100	0
2	`https://audiolibri.org/segnalazioni` `first form page found`	form	—	0	0
3	`https://audiolibri.org/chi-siamo` `first about page found`	about	—	0	0

Requests observed on first load

No user interaction took place. Time is measured from the start of navigation: a request at t = 200 ms cannot follow a consent the user never gave. The table below lists the requests of the entry page (https://audiolibri.org/); the other pages are counted in the table above and detailed in the attached JSON.

t (ms)	Host	Type	Status	Path
173	audiolibri.org	document	200	/
300	audiolibri.org	stylesheet	200	/app.css
305	audiolibri.org	script	200	/app.js
312	audiolibri.org	image	200	/audiobooks_transparent.png
332	audiolibri.org	script	200	/mobile-enhancements.js
339	audiolibri.org	font	200	/fonts/inter-latin.woff2
342	audiolibri.org	script	200	/tailwind-mobile.js
378	audiolibri.org	font	200	/fonts/fraunces-latin.woff2
559	audiolibri.org	fetch	200	/index.min.json
846	audiolibri.org	image	200	/assets/thumbs/LeZC-nKwKvo-320.webp
846	audiolibri.org	image	200	/assets/thumbs/P9TezHj4K6g-320.webp
846	audiolibri.org	image	200	/assets/thumbs/258B70gn9do-320.webp
846	audiolibri.org	image	200	/assets/thumbs/Ybk3GwspdMw-320.webp
846	audiolibri.org	image	200	/assets/thumbs/AIM93r4DE2w-320.webp
851	audiolibri.org	image	200	/assets/thumbs/gCjuHF_oRmQ-320.webp
852	audiolibri.org	font	200	/fonts/inter-latin-ext.woff2
877	audiolibri.org	image	200	/assets/thumbs/mcgeWD3bNtg-320.webp
881	audiolibri.org	image	200	/assets/thumbs/g6w0EIUDK7c-320.webp
884	audiolibri.org	image	200	/assets/thumbs/IqWqwsOJ4_o-320.webp
886	audiolibri.org	image	200	/assets/thumbs/LuKb0BJ0rSE-320.webp
887	audiolibri.org	image	200	/assets/thumbs/TyibzUugVI4-320.webp
890	audiolibri.org	image	200	/assets/thumbs/6EGRcKo79yg-320.webp
892	audiolibri.org	image	200	/assets/thumbs/NCd8upbDW6c-320.webp
893	audiolibri.org	image	200	/assets/thumbs/5p0LHdmo1nk-320.webp
894	audiolibri.org	image	200	/assets/thumbs/OYtckj0TUZ0-320.webp
895	audiolibri.org	image	200	/assets/thumbs/gJaQKDvFz7s-320.webp
895	audiolibri.org	image	200	/assets/thumbs/Uzoyi3OTgsk-320.webp
895	audiolibri.org	image	200	/assets/thumbs/5thoVsp3Iyc-320.webp
899	audiolibri.org	image	200	/assets/thumbs/LL75-JBfFfs-320.webp
899	audiolibri.org	image	200	/assets/thumbs/UbHwZeBkK8o-320.webp
899	audiolibri.org	image	200	/assets/thumbs/ouFmy5PrUNI-320.webp
899	audiolibri.org	image	200	/assets/thumbs/tReHkjFYdcs-320.webp

t (ms)	Host	Type	Status	Path
900	audiolibri.org	image	200	/assets/thumbs/5AtdjMbRI0U-320.webp
902	audiolibri.org	image	200	/assets/thumbs/UuVHriqjcXI-320.webp
902	audiolibri.org	image	200	/assets/thumbs/gkfTjUPXBJ4-320.webp
902	audiolibri.org	image	200	/assets/thumbs/vDCpE0PHKrU-320.webp
902	audiolibri.org	image	200	/assets/thumbs/3fQdmih35_g-320.webp
902	audiolibri.org	image	200	/assets/thumbs/aOaqAjWxa_0-320.webp
934	audiolibri.org	image	200	/assets/thumbs/6FfomLiE68A-320.webp
934	audiolibri.org	image	200	/assets/thumbs/z08RQXmETSI-320.webp
934	audiolibri.org	image	200	/assets/thumbs/xVOj2YkbeMU-320.webp
934	audiolibri.org	image	200	/assets/thumbs/DzA2tcuQshY-320.webp
937	audiolibri.org	image	200	/assets/thumbs/vVK8n3chX8M-320.webp
957	audiolibri.org	image	200	/assets/thumbs/In44GJstECU-320.webp
957	audiolibri.org	image	200	/assets/thumbs/Evqy8FtxWv4-320.webp
957	audiolibri.org	image	200	/assets/thumbs/1IcFpU576Xk-320.webp
957	audiolibri.org	image	200	/assets/thumbs/gvl9uFxcYi8-320.webp
958	audiolibri.org	image	200	/assets/thumbs/NW39uT2QwiM-320.webp
959	audiolibri.org	image	200	/assets/thumbs/TQJIjGIsA_0-320.webp
959	audiolibri.org	image	200	/assets/thumbs/dPBSGNIEbbc-320.webp
960	audiolibri.org	image	200	/assets/thumbs/GsfZIU39bxk-320.webp
960	audiolibri.org	image	200	/assets/thumbs/Xf6Y4vP0phI-320.webp
962	audiolibri.org	image	200	/assets/thumbs/tUgr5Lz-pvQ-320.webp
962	audiolibri.org	image	200	/assets/thumbs/_JVTi_1oi70-320.webp
962	audiolibri.org	image	200	/assets/thumbs/izokeJmyc6I-320.webp
963	audiolibri.org	image	200	/assets/thumbs/o2KiSckUa68-320.webp
963	audiolibri.org	image	200	/assets/thumbs/rWlbBGxiR2A-320.webp
963	audiolibri.org	image	200	/assets/thumbs/KjyLRFjrJ6Y-320.webp
968	audiolibri.org	image	200	/assets/thumbs/JwfnOdqhdXQ-320.webp
968	audiolibri.org	image	200	/assets/thumbs/3eC3TK4xO8Y-320.webp
969	audiolibri.org	image	200	/assets/thumbs/PrK16jOGptg-320.webp
969	audiolibri.org	image	200	/assets/thumbs/5ugJmNEkOkM-320.webp
969	audiolibri.org	image	200	/assets/thumbs/cANy5xzIuPs-320.webp
969	audiolibri.org	image	200	/assets/thumbs/ttR7f-HjLxg-320.webp
969	audiolibri.org	image	200	/assets/thumbs/es36GaQeAKk-320.webp
969	audiolibri.org	image	200	/assets/thumbs/_g4aI8GZpVw-320.webp
969	audiolibri.org	image	200	/assets/thumbs/MKs1Pj0hCrI-320.webp
969	audiolibri.org	image	200	/assets/thumbs/fPLcczHf5LI-320.webp
969	audiolibri.org	image	200	/assets/thumbs/pTK3bIx1Ajw-320.webp
969	audiolibri.org	image	200	/assets/thumbs/j4E8Ypfk1A0-320.webp
969	audiolibri.org	image	200	/assets/thumbs/GXysvSaWrb4-320.webp
970	audiolibri.org	image	200	/assets/thumbs/fTsPj03aJCI-320.webp
970	audiolibri.org	image	200	/assets/thumbs/Le7Z6xdT5ls-320.webp
970	audiolibri.org	image	200	/assets/thumbs/1cmn3qPaMv8-320.webp
970	audiolibri.org	image	200	/assets/thumbs/nfRT9NtCzAs-320.webp
970	audiolibri.org	image	200	/assets/thumbs/ZynTJ8NqMgU-320.webp
970	audiolibri.org	image	200	/assets/thumbs/ovlv0mOw4Sw-320.webp
970	audiolibri.org	image	200	/assets/thumbs/0FUj6OhuNMw-320.webp
970	audiolibri.org	image	200	/assets/thumbs/29wHMSpyL1w-320.webp
970	audiolibri.org	image	200	/assets/thumbs/-Wd5i-Q6k10-320.webp
970	audiolibri.org	image	200	/assets/thumbs/W425QtVCJy4-320.webp
970	audiolibri.org	image	200	/assets/thumbs/BInAElMNUBc-320.webp
971	audiolibri.org	image	200	/assets/thumbs/cpi2I4KZLzE-320.webp
971	audiolibri.org	image	200	/assets/thumbs/N4c2Z7nOSSk-320.webp

t (ms)	Host	Type	Status	Path
971	audiolibri.org	image	200	/assets/thumbs/OB2ube52qhg-320.webp
971	audiolibri.org	image	200	/assets/thumbs/U032wR5upx0-320.webp
971	audiolibri.org	image	200	/assets/thumbs/_k2QK1vkZms-320.webp
971	audiolibri.org	image	200	/assets/thumbs/LFKJVFO6_7I-320.webp
971	audiolibri.org	image	200	/assets/thumbs/placeholder-320.webp
971	audiolibri.org	image	200	/assets/thumbs/U-6H8SSGBao-320.webp
971	audiolibri.org	image	200	/assets/thumbs/uaQ3POQmvvQ-320.webp
971	audiolibri.org	image	200	/assets/thumbs/COOznwcoswE-320.webp
977	audiolibri.org	image	200	/assets/thumbs/wfEvDohc-aM-320.webp
980	audiolibri.org	image	200	/assets/thumbs/i08AFeL38ag-320.webp
982	audiolibri.org	image	200	/assets/thumbs/hVOcIUtUyNA-320.webp
982	audiolibri.org	image	200	/assets/thumbs/P58_2RvugIQ-320.webp
982	audiolibri.org	image	200	/assets/thumbs/SKhh3sP_K-Y-320.webp
982	audiolibri.org	image	200	/assets/thumbs/Zii5KRQNYMQ-320.webp
1032	audiolibri.org	image	200	/assets/thumbs/VyVkNgBm154-320.webp
1313	audiolibri.org	image	200	/assets/thumbs/eDbP8xRZkIQ-320.webp

Cookies present on first visit

Name	Domain	Class	Secure	HttpOnly	SameSite	Lifetime

No cookie was set on first visit.

Terminal storage

Type	Key	Class	Size

No write to terminal storage was observed.

Main response headers

Values are reproduced in full: they are evidence, and a truncated value cannot be verified.

age	`0`
alt-svc	`h3=":443"; ma=86400`
cache-control	`max-age=600`
cf-cache-status	`DYNAMIC`
cf-ray	`a5b3b7bed87b32f4-ORD`
content-encoding	`zstd`
content-security-policy-report-only	`default-src 'self'; script-src 'self' 'sha256-MGik3+GNup91ZWwmI0dkjMzUyWhqDx/D0JrQIHEnPOA=' 'sha256-yFwehGPXk8nzTLeHkzd0QTiwYo59le5Hiu9t4SqlJdc=' 'sha256-+IyAqQWbRS4+EWWlVg/ u7bHtojs1ponIRvS8G5NB0b8=' 'sha256-UjLs79H2dMN3rAe113FABrama8PSjQc5sOLH9/U/OoY=' 'sha256- Ey1Vit544AejKuLTkGh4Jw9rvKHr/OF/zCLMm51CanQ=' 'sha256-jwmVkl+KIzC84XaCfzJGAxNMOyut/ G5Dp6z2vx3gYVs=' https://www.youtube.com https://s.ytimg.com; style-src 'self' 'unsafe-inline'; img-src 'self' data:; frame-src https://www.youtube-nocookie.com https://www.youtube.com; connect-src 'self'; font-src 'self'; media-src 'self' https://archive.org https://*.archive.org https://www.liberliber.eu; worker-src 'self'; manifest-src 'self'; base-uri 'self'; form-action 'self'; frame-ancestors 'none'; object-src 'none'; upgrade-insecure-requests`
content-type	`text/html; charset=utf-8`
cross-origin-opener-policy	`same-origin`

cross-origin-resource-policy	same-origin
date	Mon, 16 Nov 2026 04:22:59 GMT
expires	Mon, 16 Nov 2026 03:34:01 GMT
last-modified	Sun, 06 Sep 2026 14:19:03 GMT
nel	{"report_to":"cf-nel","success_fraction":0.0,"max_age":604800}
permissions-policy	geolocation=(), microphone=(), camera=(), payment=(), usb=(), interest-cohort=()
referrer-policy	strict-origin-when-cross-origin
report-to	{"group":"cf-nel","max_age":604800,"endpoints":[{"url":"https://a.nel.cloudflare.com/report/v4?s=PrcWiAEBfSXxJ%2BBqWhkNeJBr9DBfC3bjTpP10lTavA7rDhpx6R4rAc1Ba33dPN6UVrPoaIYDL6bO8Bul4OLpLq5Kj%2BB8EAprYYWLLYIgtQ4FBBuAJPKLWdjr68Q0GBSMVg%3D%3D"}]}
server	cloudflare
strict-transport-security	max-age=15552000; includeSubDomains; preload
vary	Accept-Encoding
via	1.1 varnish
x-cache	HIT
x-cache-hits	0
x-content-type-options	nosniff
x-fastly-request-id	69659b0ff94295163c6faff984feb8b0d1814533
x-frame-options	SAMEORIGIN
x-github-edge-region	iad
x-github-request-id	63BE:1D3C:298F442:3224CBB:6AFA7750
x-proxy-cache	MISS
x-served-by	cache-chi-klot8100116-CHI
x-timer	S1794802980.688883,VS0,VE45

TLS certificate

Issuer	Google Trust Services — WE1
Classification	free
Valid from	2026-09-19T02:24:44+00:00
Valid until	2026-12-18T03:22:11+00:00 (31 days)
Protocol	TLSv1.3
SHA-256 fingerprint	dc731ce2ff79bdaa49e60c714e85142b08667fb9a37fe0b0ee2b1ddc64a225c3

Legal documents read

Type	privacy notice
URL	https://audiolibri.org/privacy.html

How it was found	linked from the page, the path names a document, the link text matches exactly
Extracted text	6025 characters · SHA-256 `7aa78389f159cebbe8a4c3aeffc4540ecf87030da6748dce4235eaf0d053d86d`
Art. 13 elements present	Identity of the controller (Art. 13(1)(a)), Contact details of the controller (Art. 13(1)(a)), Purposes of the processing (Art. 13(1)(c)), Legal basis (Art. 13(1)(c)), Recipients or categories of recipients (Art. 13(1)(e)), Transfers to third countries (Art. 13(1)(f)), Retention period (Art. 13(2)(a)), Rights of the data subject (Art. 13(2)(b) — Arts. 15-22), Right to lodge a complaint with the supervisory authority (Art. 13(2)(d)), Automated decision-making and profiling (Art. 13(2)(f)), Date the document was last updated
Elements not recognised	Contact details of the data protection officer (Art. 13(1)(b))
Vendors named	cloudflare-cdn, github-pages, google-generic, youtube, youtube-nocookie-note

Passages satisfying the elements recognised:

Identity of the controller (Art. 13(1)(a))	… o 2026 · audiolibri.org Italiano Chi gestisce il sito (Titolare del trattamento) Fabrizio Salmi — Genova, Italia. Progetto personale e …
Contact details of the controller (Art. 13(1)(a))	… ale e non commerciale. Contatto per richieste privacy: fabrizio.salmi@gmail.com . Quali dati trattiamo e perché Indirizzo IP e dati ba …
Purposes of the processing (Art. 13(1)(c))	… atto per richieste privacy: fabrizio.salmi@gmail.com . Quali dati trattiamo e perché Indirizzo IP e dati basilari della richiesta sono trat …
Legal basis (Art. 13(1)(c))	… hosting per erogare la pagina e proteggerla da abusi. Base giuridica: legittimo interesse (art. 6(1)(f) GDPR). Non conservi …
Recipients or categories of recipients (Art. 13(1)(e))	… source. The affected pages say so next to the summary. Processors, transfers, rights Processors: GitHub, Inc. (USA, host …
Transfers to third countries (Art. 13(1)(f))	… essun dato viene inviato a terze parti. Responsabili e trasferimenti extra-UE GitHub, Inc. (USA) — hosting statico (GitHub Pages) …
Retention period (Art. 13(2)(a))	… se giuridica: legittimo interesse (art. 6(1)(f) GDPR). Non conserviamo questi dati. Nessuna analitica di terze parti : non usiamo servizi …
Rights of the data subject (Art. 13(2)(b) — Arts. 15-22)	… dei fornitori sono transitori. I tuoi diritti Accesso, rettifica, cancellazione, limitazione, opposizione, portabilità …
Right to lodge a complaint with the supervisory authority (Art. 13(2)(d))	… R) — scrivi a fabrizio.salmi@gmail.com . Puoi proporre reclamo al Garante per la protezione dei dati personali . Ness …
Automated decision-making and profiling (Art. 13(2)(f))	… on usiamo servizi di statistiche, pixel pubblicitari o profilazione. Nessun account, modulo o newsletter. Non raccogliamo …
Date the document was last updated	… — Audiolibri.org ← audiolibri.org Informativa Privacy Ultimo aggiornamento: 12 agosto 2026 · audiolibri.org Italiano Chi gestisce …

Type	accessibility statement
URL	`https://github.com/fabriziosalmi/audiolibri/blob/main/ACCESSIBILITY.md`
How it was found	linked from the page, the path names a document, the link text matches exactly, deeply nested path
Extracted text	9490 characters · SHA-256 `8cfc18810d60396f87006d4df2c47aa7410879d9d7f448a87e728aed46ffe079`
Art. 13 elements present	Recipients or categories of recipients (Art. 13(1)(e)), Date the document was last updated

Elements not recognised	Identity of the controller (Art. 13(1)(a)), Contact details of the controller (Art. 13(1)(a)), Contact details of the data protection officer (Art. 13(1)(b)), Purposes of the processing (Art. 13(1)(c)), Legal basis (Art. 13(1)(c)), Transfers to third countries (Art. 13(1)(f)), Retention period (Art. 13(2)(a)), Rights of the data subject (Art. 13(2)(b) — Arts. 15-22), Right to lodge a complaint with the supervisory authority (Art. 13(2)(d)), Automated decision-making and profiling (Art. 13(2)(f))
Vendors named	github-pages

Passages satisfying the elements recognised:

Recipients or categories of recipients (Art. 13(1)(e))	… .png service-worker.js sitemap.xml stats.py synopsis_reprocessor.py tailwind-mobile-plugin.js tailwind-mobile.js tailwi …
Date the document was last updated	… lore Trending repos GitHub Sponsors Developer articles Changelog Changelog Your source for the latest features, improve …

Documents looked for and not available

Listed because they are part of the evidence: they show where the document was looked for before concluding it is not reachable.

Type	URL	How it was found	Outcome
cookie policy	`https://audiolibri.org/cookie-policy`	a conventional path, no link to it was found	not available (HTTP 404)
cookie policy	`https://audiolibri.org/cookie`	a conventional path, no link to it was found	not available (HTTP 404)
cookie policy	`https://audiolibri.org/informativa-cookie`	a conventional path, no link to it was found	not available (HTTP 404)

Reproducibility

This document can be derived again from scratch. The configuration digests identify the rules and knowledge base that were applied: same digests and same target means the same analysis was applied. The evidence digest ties the report to the observation attached to it; it is not stable across runs, because sites change — which is exactly what makes it possible to prove that they did.

engine	scanprivacy 0.1.3
python	3.12.16
system	Linux 7.0.0-1019-azure (x86_64)
playwright	1.62.0
browser	Chromium 151.0.7922.34
weasyprint	70.0

Ruleset digest	`2c1582a40adcaafd8d101cc04ba3123cdafa87a9fabd3b1b569fd37b6845209c`
Knowledge base digest	`abfd964d4f40580629ebf1eb4897906a76af05782e0b24ecfccc1e7f6a7d62bc`
Evidence digest	`c09a08748835f99d1d7f086cc61dd45beabe20375920203245da852c787c4abd`
Computed on	canonical JSON of the "observation" block (sorted keys, no whitespace)

Observation parameters

user agent	`scanprivacy/0.1 (+passive EU privacy conformance observation; independent research, good faith; contact: abuse@scanprivacy.org)`
wait after DOMContentLoaded (ms)	`4000`
navigation timeout (ms)	`20000`
per-scan budget (s)	`120.0`
robots.txt honoured	`True`
maximum documents read	`4`
maximum requests recorded	`400`

How to re-run and how to check

1. `pip install scanprivacy && scanprivacy install-browser`
2. `scanprivacy scan https://audiolibri.org --json evidence.json --md report.md --pdf report.pdf`
3. `scanprivacy verify evidence.json # recomputes every digest in this section`
4. Each individual finding also carries the steps to check it with a browser and curl, without this tool.

Digests of the individual rules applied

Appendix: lets a reader establish whether a rule changed between two scans, and which one.

File	SHA-256
`PM-AI-01.yml`	`2d7aaa3685a8a931cfe0b17789e5f7b01fad6246da12e83bbffc30b4dd7ac2b0`
`PM-CNS-01.yml`	`bbd6053ccf17b897ddd1ce97fbd08ff3a8ea807142544f487fa8166f0e8b2ef5`

File	SHA-256
PM-CNS-02.yml	561cca420d8ef28ee5d78113cb2eeb2886786154c199bea5d79bedca43dce26b
PM-CNS-03.yml	527d5bd5815fe81ad6ea69e80513edc744390f3897a0b276370237f4bde9c0d6
PM-COK-01.yml	29f62161fda432572d9f22e569e6b38226f4272a6b14892bd998b3ac5b8b61b6
PM-COK-02.yml	de9a97a11c02c4ea676bfe5e27c46d163a1592bdcbae88d4be0b7d9bd6f7bc43
PM-COK-03.yml	ccbd9899a1814fe283f80f8b7b581c146823e59fea6d49a6cbc092605fb059e6
PM-COK-04.yml	dd244ca25fcae43630f93e4828c1235d3e0ac18818059b690c0ff6760a3c7470
PM-COST-01.yml	c869b035f99f7b49d99d6d6a5e241cc7a0dc9ff330d34d1e7357689f46f8e85e
PM-DIS-01.yml	1ce52b4ab5c3f382507a5c8e9293fb0847d8b9602da489f47fb9ef561729825d
PM-DOC-01.yml	f6745d7613d8844a5603842ee3a87afcf4c5997884d04149879d8120b4b8b2e8
PM-DOC-02.yml	263b60aa175d88aea3b5c51ce7f7613b16f6743ef09dce2dd98f0769433f5f3d
PM-DOC-03.yml	41171ea8e397fc1df228be3bb0039a5f3abb2f917e50cf6c796380719503c2ee
PM-DPIA-01.yml	69e31ef3c2aecd5f9878d26d95b9868163c08dac0e139bb3cf14cc991820fe16
PM-FRM-01.yml	7423589542c4ecfd82dff069aa0a59b63c5474caa209d256f171c6db2df49723
PM-IAM-01.yml	e5286a436bd327a7ad94e4f1abba892e763158b06476e5df0d6fecfb14d5bc1b
PM-IAM-02.yml	a51a4089dfccb6ac522f7f9235c6dca5ad49fd838157ceaf2bb463c54f669a9f
PM-IAM-03.yml	26b79fdc8f8d6bd5c2ee74edeb3b9135ba05bacaecf0bea8a2ed7170bcbb5e4c
PM-IAM-04.yml	d3e99618a12baad94d538048e9df83343c342157c3ec487e205b536a64485689
PM-IAM-05.yml	b037ee786ec16721ca774010732135279546761 9e9b265c4a1f67cdec96fbcdf
PM-REJ-01.yml	272d92883ff83b37e55a61cd2ce5c72d81cd798e182c1d8a8855570ea4446969
PM-REJ-02.yml	739963feff9b25bfa7445f60136faa4c316b885e5b336e7a8b5e6927c9664de8
PM-REJ-03.yml	7baa3191e4428cf9f14484578121132c60380bf3b525d06f330445c707279cbf
PM-REJ-04.yml	152719eed042c697a5e41e4d2bd126240d796c2dbd20dae0e7fb8bec56ee708c
PM-SEC-01.yml	40cd258fbb6c436b8c0dcead02ab533838d6ca354e5a8262fee7e27f48efab66
PM-SEC-02.yml	a2ddca82f7f9001ac883d7c27e3f624174de7c9883626d0ab7b3f435b720a49f
PM-SEC-03.yml	f611bf7e770d0cb24dbf650bb003144084c40f63109b71daa797170f509ceb27
PM-STO-01.yml	f71621cb776e2ad836d6bbf7c48e4d14a737d3e02c4c4e96367fc3f0da1033b5
PM-STO-02.yml	d97fb521421117de3762c8ae4da8253f671df4dc8f269aff1f74bc2f022f7ced
PM-TRF-01.yml	0cbd07e3a6e08084dad1f46849b28b1568ec14173b2c9c0ae3b4c87338c1f151
PM-TRF-02.yml	1ca16349fdca4b8af6f7e6c2ac146ad81ab9cae50e927c85aea84560dc9ce952

Method and limits

Method	only the public page indicated is loaded, with a headless browser
Pages	at most 3 pages of the same site, chosen deterministically, one page load per second per host
Interaction	none — no clicks, no form submissions, no authentication

Consent	no choice is expressed: what the site does to a visitor who has not yet decided is what gets observed
Extra requests	only the legal documents linked from the page, one per kind
Intrusive tests	none — no fuzzing, no enumeration, no access to restricted areas
robots.txt	honoured for every URL the engine requests
User-Agent	scanprivacy/0.1 (+passive EU privacy conformance observation; independent research, good faith; contact: abuse@scanprivacy.org)
Observation point	not recorded. Set SCANPRIVACY_VANTAGE to state where the scan was run from, or SCANPRIVACY_VANTAGE_LOOKUP to have it looked up. Neither is on by default: an engine that asks a third party where it is, on every scan, would be doing the thing this report is written to detect.

> **Stated limits.** The observation covers a single page and a single visit: tools present elsewhere do not show up, and two consecutive loads may differ. No consent was expressed, so behaviour after acceptance is not verified. Art. 13 elements are recognised from the text: an unusual wording can escape detection, which is why documentary findings carry "indicated" confidence. The mapping to ISO, NIS2 and SOC 2 orients the work and does not attest conformity to those schemes.
>
> Assessment carried out by observing only the traffic generated by the browser when loading public pages, with ordinarily available tools. Independent technical research conducted in good faith: it is not legal advice nor professional data protection consultancy.