

PRIVACY NOTICE

Under Articles 13 and 14 of Regulation (EU) 2016/679

Controller: CODENEX INTERNATIONAL SRL | **Version:** 1.0 - 25 August 2026

1. Controller and contacts

The controller for CloudVoce.it registration, accounts, contract, billing, support, security and commercial management is CODENEX INTERNATIONAL SRL, Strada Gabroveni 61, 030167 Bucharest, Romania, VAT/CUI RO52632905. Contacts: privacy@codenex.it; get@cloudvoce.it; certified e-mail codenex@pecsicura.com.

For data stored in the PBX and processed on the Customer company's instructions, that company is the controller and CODENEX acts as processor under Article 28 GDPR, as set out in the DPA.

2. Data and sources

Data is obtained from the data subject or company administrator, the CRM and Codenex Customer Area, Stripe, VIES, telephone carriers and technical systems during use.

- identity, company name, tax code or EU VAT number, address, country, e-mail and telephone numbers;
- account, hashed password, roles, language, encrypted 2FA secret, sessions and documentary acknowledgements;
- orders, plans, masked Product Key, service status, invoices, Stripe transaction data and VIES results;
- IP address, User-Agent, access and audit logs, security events, hashed API tokens and technical identifiers;
- contact-form, ticket and support communication data;
- when the PBX is used: numbers, CDRs, contacts, recordings, voicemail, fax, webhooks, TTS prompts and SIP settings, normally processed on the Customer's behalf.

3. Purposes and legal bases

Purpose	Legal basis	Main data
Registration, contract, onboarding, supply and support	Contract/pre-contractual steps - Art. 6(1)(b)	Identity, contacts, account, plan, tickets
Billing, accounting, VIES and compliance	Legal obligation - Art. 6(1)(c)	Tax, orders, invoices, payments
Security, fraud prevention, audit and legal claims	Legitimate interests - Art. 6(1)(f)	IP, logs, events, technical IDs
Operational and renewal communications	Contract - Art. 6(1)(b)	E-mail, telephone, service state
Optional marketing, if introduced	Consent - Art. 6(1)(a)	Contacts and preferences

4. Recipients and suppliers

Authorised staff and, where necessary, hosting and security, e-mail, CRM/Customer Area, payment (Stripe), VIES, support and electronic-communications providers may access data. If TTS is used, the text and instructions needed to create audio may be sent to the Gemini/Google model provider.

CODENEX does not sell personal data. The current list of relevant sub-processors is available on request or in the panel. Data is disclosed to authorities only where required by law.

5. International transfers

Where a supplier processes data outside the EEA, CODENEX relies on an adequacy decision, the Data Privacy Framework where applicable, European Commission Standard Contractual Clauses and risk-appropriate supplementary measures. Processor data is also subject to the DPA instructions and authorisations.

6. Retention

Category	Period or criterion
Contracts, orders, invoices and payments	The statutory civil and tax period, normally 10 years
Account and operational profile	The relationship plus the period needed for obligations and claims
Security and access logs	Normally up to 12 months; longer only for incidents or legal duties
Tenant CDRs	Superadmin-selected period, default 365 days
Call recordings	Superadmin-selected period, default 90 days
Voicemail, fax, contacts and content	Until Customer deletion or termination, subject to technical and legal needs
Website enquiries	Time needed to respond and manage the relationship; anti-abuse data is non-reversible fingerprints

7. Cookies and website

The website uses necessary technical cookies and remembers the banner choice. Optional measurement or marketing services are enabled only after user choice and described in the website Cookie Policy. Refusal of optional cookies does not prevent browsing or registration.

8. Automated controls

Security rules may temporarily block access, calls or tokens when anomalies are detected. They protect tenants and infrastructure; the Customer may request human review. No commercial profiling based on telephony data is carried out.

9. Rights

Data subjects may request access, rectification, erasure, restriction, portability and objection, and may withdraw consent without affecting earlier processing. Requests should be sent to privacy@codenex.it; identity verification may be required.

A complaint may be lodged with the competent supervisory authority. For the Romanian establishment: ANSPDCP, dataprotection.ro. The right to approach the authority of another Member State remains unaffected where GDPR permits.

10. Required data and updates

Fields marked as required are necessary for registration, tax checks, contract or security. Failure to provide them may prevent the relevant operation. Updated notices are published and, where necessary, submitted for renewed acknowledgement.