CODENEX SRLS
Operating office: Via Duca della Verdura 27 - 90143 Palermo (PA)
Registered office: Via Resuttana 360 - 90146 Palermo (PA)
VAT IT07425080822 - CF 07425080822 - REA PA-457974
PEC: codenex@pecsicura.com - SDI 9SUB64Q
E-mail: hello@codenex.it - Sales: +39 02 40042 262

TELEMARKETING AND DO-NOT-CALL POLICY

Rules for promotional and outbound campaigns

CODENEX SRLS - CloudVoce.it | **Version:** 1.8 - 31 October 2026

CloudVoce provides technical calling tools and does not certify lists, consents or campaigns. The Customer is the controller and is responsible for lawful basis, do-not-call checks and compliance in each destination country.

1. Scope

This policy applies to telemarketing, telesales, promotional surveys and automated or assisted calls to persons or numbers covered by specific rules. Operational calls remain subject to privacy, fairness and objection rights where applicable.

2. Italian Public Do-Not-Call Register (RPO)

- register as an RPO operator where required;
- check Italian-number lists before a campaign; the current telephone-list validity period is 15 days;
- retain evidence of the check, list source, consents and principal instructions;
- promptly exclude objectors and maintain an internal suppression list;
- repeat checks when validity expires or the list changes.

3. Consent and lawful basis

The Customer determines and documents the lawful basis. Consent must be freely given, specific, informed, unambiguous and withdrawable. A commercial relationship does not automatically authorise every promotional call. Any exception must be assessed and documented.

4. Identity and caller ID

- present an assigned, authorised and identifiable callback number where required;
- identify the caller, principal and purpose at the beginning;
- provide privacy information and a simple objection method;
- comply with applicable times, frequency and AGCOM/Garante rules;
- comply with any ROC registration and required codes or prefixes.

5. Automated calls and recording

Robocalls, prerecorded messages and systems without an operator require the conditions prescribed by law. Recording and staff monitoring require notice, lawful basis, minimisation and employment-law compliance. TTS does not make an unlawful campaign lawful.

6. Calls to other countries

For non-Italian numbers, the Customer checks the destination country's laws, including suppression lists, consent, permitted times, caller ID and data transfers. Compliance with the Italian RPO alone is insufficient.

7. Controls and consequences

CODENEX may request evidence, block caller IDs or campaigns, apply thresholds and suspend a tenant where complaints, abnormal traffic or regulatory risk arise. The Customer indemnifies CODENEX for campaigns attributable to its lists or instructions, without prejudice to the supplier's own responsibilities.