

**A.N.C.I.C., National Association of Commercial Information Companies**, representing all companies professionally engaged in commercial information activities, has developed the “Code of Conduct for the Processing of Personal Data for Commercial Information Purposes,” approved by the Italian Data Protection Authority (Garante per la protezione dei dati personali) by Decision No. 127 of June 12, 2019, pursuant to Regulation (EU) 2016/679 and Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018.

The Code of Conduct embodies the principle of accountability, strongly emphasized in the GDPR, requiring trade associations and companies to adopt a conscientious, transparent, and effective approach to regulatory compliance.

With the new Code, commercial information companies authorized by the Prefect under Article 134 of the Public Security Law (TULPS) and Ministerial Decree No. 269/2010, whether or not associated with A.N.C.I.C., which provide information on the commercial reliability of entrepreneurs and managers, can process the personal data of listed individuals without obtaining their consent—relying on legitimate interest—but must ensure enhanced protections for individuals. This includes properly informing them about the data processing and ensuring they can fully exercise their privacy rights, such as objecting to processing, rectifying, or updating data.

The **A.N.C.I.C. Privacy Information Portal** aims to:

- Provide individuals with information about data processing for commercial information purposes by companies registered on the portal, including links to their respective detailed privacy notices and contact details of relevant data controllers for submitting requests, as outlined on the portal.
- Allow individuals to submit initial requests to confirm whether or not their personal data is held by a member company. If so, they can contact the company directly using the specific references provided on the portal to obtain further information, learn about the data, and exercise their rights under Articles 15-22 of Regulation (EU) 2016/679.

---

## Privacy Regulations and Code of Conduct

### Why Companies Registered on the Portal Collect and Process Personal Data

Companies providing commercial information services authorized by the Prefect under Article 134 of Royal Decree No. 773 of June 18, 1931 (“TULPS”) and Ministerial Decree No. 269/2010, whether associated with A.N.C.I.C. or not, collect personal data from public sources or those generally accessible to anyone, as well as financial, economic, credit, industrial, and production-related information needed to provide economic and commercial information services to third parties.

Openapi SpA  
Viale Filippo Tommaso Marinetti 221 - 00143 Roma  
REA 1378273 Cap. Soc. € 50.000,00 i.v. – P.I. IT12485671007

Sede Legale e Operativa  
Viale F.T. Marinetti 221  
I-00144 Roma

Sede Ricerca e sviluppo  
Piazza San Giovanni Decollato 6  
I-05100 Terni



This information is essential for managing commercial relationships and economic and financial activities and for protecting related rights.

To learn more about the specific data collected and how it is processed, see the information available [here](#).

---

## The Code of Conduct

In line with its commitment to protecting personal data, A.N.C.I.C. has developed and proposed, on behalf of all companies professionally engaged in commercial information activities, whether members or not, the “**Code of Conduct for the Processing of Personal Data for Commercial Information Purposes**”, approved by the Italian Data Protection Authority (“Garante”) under Article 40(5) of Regulation (EU) 2016/679.

The Code of Conduct guarantees that companies registered on the portal adhere to best practices and employ technologies that ensure data security and transparency in managing data collected for commercial information purposes.

The Code of Conduct is available [here](#).

---

## A.N.C.I.C.’s Commitment

In addition to its ongoing collaboration with the Garante, A.N.C.I.C. represents all companies professionally engaged in commercial information activities, whether members or not, in institutional settings across Europe. These forums work on shared rules for protecting personal data at the EU level, in line with Regulation (EU) 2016/679 (General Data Protection Regulation).

The best practices and experience of A.N.C.I.C.’s members offer valuable contributions that A.N.C.I.C. and Italian companies bring to EU institutions.

---

## Privacy Notice on Personal Data Processing for Commercial Information Purposes by A.N.C.I.C.

<https://www.informativaprivacyancic.it/>

This notice is provided under the applicable data protection legislation, particularly Regulation (EU) 2016/679 (the “Regulation”) and Legislative Decree No. 196/2003 (the “Code”), as amended by Legislative Decree No. 101/2018, on behalf of companies engaged in commercial information activities (the “Companies” or “Providers”) registered on the website

Openapi SpA  
Viale Filippo Tommaso Marinetti 221 - 00143 Roma  
REA 1378273 Cap. Soc. € 50.000,00 i.v. – P.I. IT12485671007

Sede Legale e Operativa  
Viale F.T. Marinetti 221  
I-00144 Roma

Sede Ricerca e sviluppo  
Piazza San Giovanni Decollato 6  
I-05100 Terni



[www.informativaprivacyancic.org](http://www.informativaprivacyancic.org), established by A.N.C.I.C. (National Association of Commercial Information Companies). The notice complies with the simplified procedures outlined in Article 5 of the “Code of Conduct for the Processing of Personal Data for Commercial Information Purposes,” approved by the Italian Data Protection Authority by Decision No. 127 of June 12, 2019.

The full notice and details about the processing activities, sources of data, types of data, processing purposes, legal bases, and individuals' rights are available on the portal, along with contact details for registered companies and their respective Data Protection Officers (DPOs).

At the end of this notice, you will find references to the companies participating in the portal, including links to their respective websites where their privacy policies can be reviewed, as well as details of the designated contacts for any requests, as specified therein.

---

**Openapi SpA**  
Viale Filippo Tommaso Marinetti 221 - 00143 Roma  
REA 1378273 Cap. Soc. € 50.000,00 i.v. – P.I. IT12485671007

**Sede Legale e Operativa**  
Viale F.T. Marinetti 221  
I-00144 Roma

**Sede Ricerca e sviluppo**  
Piazza San Giovanni Decollato 6  
I-05100 Terni



## 1. SOURCE OF DATA PROCESSED

Dear Sir/Madam,

We inform you that, based on specific authorization by the local prefecture (pursuant to Article 134 of Royal Decree No. 773/1931 as amended, containing the Consolidated Text of Public Security Laws, hereinafter "T.U.L.P.S."), our Companies collect and process personal data either provided directly by the data subjects or obtained from public registers, lists, archives, or documents accessible to anyone (e.g., maintained by Chambers of Commerce or the Revenue Agency) or generally available sources (e.g., categorical directories, press reports, or publicly accessible websites).

---

## 2. TYPES OF DATA PROCESSED

The Suppliers may acquire both organizational, production-related, industrial, commercial, economic, financial, asset-related, administrative, and accounting information concerning the activities of economic operators (e.g., sole proprietorships, small entrepreneurs, professionals, key business figures, etc.), and data pertaining to individuals who do not engage in business or professional activities. Commercial information may include data from company registration records, protested bills, prejudicial actions, property records, and any judicial data obtained from public or generally accessible sources.

Upon request from our clients (i.e., public or private entities requesting commercial information services from the Suppliers), personal data from the sources described above may be supplemented with additional information obtained from private sources (other companies or economic operators). This information may include details about an enterprise's or professional's payment habits in their commercial relationships. In such cases, the privacy notices provided by these entities to their data subjects specify the possibility of communicating data to commercial information companies, such as ours, for verifying the reliability or creditworthiness of potential clients.

No acquisition or processing of special categories of personal data under Article 9(1) of the Regulation, or information covered by trade secrets, is conducted for commercial information purposes.

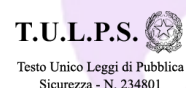
In cases explicitly provided for by the Code of Conduct, the Companies may process data related to criminal convictions and offenses under Article 10 of the Regulation, obtained from public sources or, under certain circumstances, from generally accessible sources, while adhering to the applicable legal and regulatory provisions.

---

Openapi SpA  
Viale Filippo Tommaso Marinetti 221 - 00143 Roma  
REA 1378273 Cap. Soc. € 50.000,00 i.v. – P.I. IT12485671007

Sede Legale e Operativa  
Viale F.T. Marinetti 221  
I-00144 Roma

Sede Ricerca e sviluppo  
Piazza San Giovanni Decollato 6  
I-05100 Terni



### 3. PURPOSES OF PROCESSING

The Companies process data as independent data controllers to provide third parties (our clients) with commercial information services. This enables clients to assess the economic, financial, and asset situation of a person and, consequently, their solidity, solvency, and reliability in existing or prospective commercial relationships, as well as to protect their rights.

Additionally, commercial information may be provided to clients in the form of categorized lists for marketing, telephonic outreach, or commercial, promotional, and advertising communications, in compliance with applicable laws, particularly concerning automated systems like email, fax, pre-recorded messages, and SMS.

Data acquired by the Suppliers may also undergo statistical analysis or processing, either automatically or by experts, to assess—summarily or via scoring—the robustness, solvency, and reliability of the subjects, considering their overall financial status and past or current debts and credits.

---

### 4. LEGAL BASIS OF PROCESSING

Data processing for the commercial information purposes described above, including scoring assessments, is based on the necessity of pursuing the legitimate interests of the Companies providing these services and the clients requesting them. These interests include conducting due diligence on the financial status of data subjects, safeguarding rights, and complying with anti-money laundering regulations, fraud prevention, and legal protections.

Processing is conducted in full compliance with the Code of Conduct and relevant laws while respecting the rights and freedoms of data subjects, as per Article 6(1)(f) of the Regulation.

---

### 5. PROCESSING METHODS AND SECURITY

Data is predominantly collected electronically and stored in the Companies' databases after appropriate checks for accuracy, completeness, and reliability. Authorized personnel manage and access these databases, adhering to confidentiality obligations and the Code of Conduct.

Each Supplier has appointed a Data Protection Officer (DPO) whose contact information is available on their respective websites.

---

## 6. DATA DISCLOSURE AND TRANSFER TO THIRD COUNTRIES

Data collected under this Code of Conduct may be disclosed to our clients within or outside Italy. If such disclosure involves transfer to third countries (outside the European Economic Area), the Supplier ensures compliance with Chapter V of the Regulation. Data is never disseminated publicly.

---

## 7. DATA RETENTION

Data related to adverse events, such as bankruptcies, is retained for a maximum of 10 years from the event's opening date, except under certain conditions where further retention is warranted.

---

## 8. INTERNAL COMPLAINT PROCEDURES

Data subjects who believe their rights have been violated may file a complaint with the accredited Monitoring Body (OdM). Additionally, they retain the right to lodge a complaint with the Data Protection Authority or pursue legal remedies.

---

## 9. DATA SUBJECTS' RIGHTS

Data subjects may exercise their rights under applicable laws, including access, rectification, deletion, restriction, and objection to processing, as detailed in the Regulation. They may also request information about the presence of their data in our systems via the portal's dedicated section ([link](#)).

---

## 10. CONTACT INFORMATION

For further details, please refer to the privacy notices on each Company's website or contact:

- **Email:** [ancic@confcommercio.it](mailto:ancic@confcommercio.it)
- **Address:** ANCIC, Corso Venezia 51, 20121 Milan.

More information and an updated list of Companies adhering to the Code of Conduct are available on the portal: [www.informativaprivacyancic.org](http://www.informativaprivacyancic.org).