

Bancomail Database Policies

Version of October 8, 2026

Holder of data processing

Bancomail S.p.A. (P.IVA: 02727350999 - REA: GE 506965), Operational offices: Via D'Andrade 34/106 - 16154 Genoa (GE) IT | Innovation Campus - Via Lombardia 2/a - 20068 Peschiera Borromeo (MI) IT - Registered office: Via D'Andrade 34/106 - 16154 Genoa (GE) IT

Telephone: +39 010-8446402

Email: database@bancomail.com

Pec: bancomail.spa@legalmail.it

Data Protection Officer: Avv. Luca Mazzeo, dpo@bancomail.com, PEC luca.mazzeo@ordineavvgenova.it

Policy on the acquisition and processing of the Bancomail Database

Data acquisition

Bancomail acquires, processes and manages only master data relative to economic activities, businesses and freelancers. It does not process data of private individuals or consumers.

Inside the Database there are 2 cases/types of data:

1. Full Legal Person

It represents 75% of the total records in our Database: companies, associations and entities with various corporate group forms and generic contact data (eg: info @) or department (es .: marketing @, sales @, etc.).

2. Legal Person with natural person contact data

It is a much less frequent case in our Database, but existing. Contact data that incidentally identifies the "natural person" can appear according to two patterns:

- a) a named address on a company domain (e.g. john.doe@company.com);
- b) a named address on a generic or personal domain, used as the business contact (e.g. johndoe@gmail.com).

Although they were made public by the data subject as contact details for their professional activity, these data make it possible to identify a natural person and therefore fall within the definition of personal data under Art. 4 GDPR. For this reason they cannot be treated as mere data of a legal person, but must be handled as personal professional contact data. Processing is based on legitimate interest, with a privacy notice provided under Art. 14 and the rights granted by the GDPR guaranteed, in particular the right to object.

All data types are collected, processed and transferred in compliance with the General Data Protection Regulation (GDPR) and national laws.

For more information click [here](#)

The data included in Bancomail's database have mixed and various sources. The main source for data acquisition usually comes from:

1. Spontaneous and informed provision by the data subject, through subscription forms.
2. Provision through transfer from verified, reliable, and legally compliant sources.
3. The presence in public directories as set forth by the legislation in force (chamber of commerce certificates, professional registers, industry associations, open data lists, etc.).

Once in the database, the data pass through further integration and verification processes:

1. Product classification based on a proprietary standard codification.
2. Geo-referencing through the ISO 3166 standard.
3. Data normalization through proprietary standards.
4. Integration of structural and identification data (turnover volume, number of employees, import/export, VAT identification number, etc.) and by matching complementary data with public data (e.g. Chambers of Commerce).

Purpose of data processing

Our goal is to connect companies and freelancers with complementary commercial nature.

Collected information

Simple and "public" data, like: company name, address, phone*, fax*, email address.

The data were collected from lists of Chamber of Commerce and / or other public directories or for direct approval, advertising material, market surveys and databases acquired from authorized providers.

Data processing methods

Data are processed in compliance with legal requirements, by safety procedures aimed to preserve their integrity, confidentiality and traceability.

Particularly, prior to any processing and integration according to the General Data Protection Regulation (GDPR) and national laws, a complete informative note on data processing methods and legitimate interests is transmitted to the data subject (if contemplated) for the data treatment and on how to exercise general rights.

Periodically the policy is repeated in order to remind to the data subjects its existence and their rights.

Some data are shared by us with trusted suppliers that offer the services needed to send communications regarding the data processing. We only share the minimum necessary information and it's not permitted to these third parties to use the information for other purposes than those indicated in our Privacy Policy. These services operate on servers

located inside and outside the European Union owned and / or available to Bancomail S.p.A and / or delegated third-party companies, duly appointed as data controllers that operate in compliance with the GDPR provisions.

The servers where Bancomail's databases are managed and stored are within the EU and protected by high security standards to make them inaccessible from outside the company's network.

The data are stored for the necessary time to manage the purposes for which they are collected, in compliance with current regulations and legal obligations.

Subjects authorized to the data process

The processing of the collected data is carried out by Bancomail S.p.A. internal staff authorized to process it according to specific instructions given in compliance with current legislation.

Data treatment

Bancomail provides data only to customers identified through mandatory information of address and existence, to whom is always provided a regular purchasing invoice.

Each record inside the database preserves historical information of all the buyers that purchased it over time. This allows the constant traceability of the data.

Exercise of rights: access, cancellation, update, correction

Bancomail ensure easy and free access to the exercise of the rights on data processing. To request the verification and / or cancellation of your data, contact our offices through the contact details below, indicating the email address to which you refer and which right you want to exercise.

At any time - by communicating the email address to which you refer - you can request access to data, to object the data processing or to request the cancellation, modification or update of all the information collected by Bancomail S.p.A, exercising the right to limit the processing and data portability database@bancomail.com or bancomail.spa@legalmail.it.