

CODE OF CONDUCT FOR THE PROVISION OF THE COMPANY MESSAGE SERVICE THROUGH ALPHANUMERIC SENDER IDs (ALIAS)

The following definitions apply to this Code of Conduct:

Agreement: each agreement and/or “Order Form” entered into by and between CM.com and the Client;

Client: the party with whom CM.com enters into an Agreement and who uses or who requests to use a company Messaging service;

CM.com: CM.com Italy S.r.l., a private limited liability company, registered under registration number 2608080;

End User: a natural person or entity authorized by Client to use or request to use an electronic communication service accessible to the public for purposes that are not related to the carrying out of work, commercial or professional activities;

Business Message: SMS/MMS-type communications and direct data transmission, in single or mass mode, to end users by non-consumer users, such as companies or organizations, for social, information and advertising purposes as well as to receive from SMS/MMS end users or data transmissions to provide services of the same nature;

Business Messaging Service: electronic communications service that allows for Business Messaging;

CLI - Calling Line Identification: identification of the call line by means of the number defined by ITU-T Recommendation E.164 associated with the same line;

Alias: alphanumeric character string transmitted in the field provided for sending the CLI in SMS / MMS communications and data transmission;

Code: Code of electronic communications contained in the Legislative Decree n. 259 of 1 August 2003, as amended by Legislative Decree no. 70 of 28 May 2012 and by Legislative Decree 207/2021 of 8 November 2021.

1. OBJECT AND SCOPE

- 1.1. This Code of Conduct defines the main operating rules to be followed for the establishment of Aliases and the initiatives envisaged for the protection of End Users.
- 1.2. This Code of Conduct shall remain in force limited to the parts necessary to ensure the functioning of the Alias registry used during the experimentation and until the new Alias register is made available.
- 1.3. CM.com undertakes to keep this Code of Conduct available on its website, until the Code of Conduct is no longer in force.
- 1.4. The Client is responsible for the correct implementation of the rules set out in this Code of Conduct.

2. CRITERIA FOR ESTABLISHING ALIASES

- 2.1. In order to use an Alias the Client must obtain one or more E.164 numbers to be associated with the Aliases from CM.com, in compliance with article 2 of Annex A of resolution 12/23/CIR. Aliases can be obtained by Clients with a VAT number.
- 2.2. Client must avoid the use of Aliases already used by others and Aliases that are similar to Aliases already in use. The E.164 numbers can be associated with multiple Aliases as long as they are used by the same Client.
- 2.3. The Client must ensure that the recipient of Business Messages can clearly identify the Client, to avoid false identification. Aliases must be constituted in such a way as to be distinctive of the Client, not detrimental to the rights of others and not misleading for the recipient of the Business Messages.
- 2.4. The following generic Aliases are not permitted:
 - a. common names (e.g., "Restaurant"; "Pizzeria");
 - b. simple personal names (e.g., "Mario");
 - c. simple surnames or first and last names unless they correspond to the company name or contain the titles or acronyms of the profession carried out (e.g., Avv, Dr., etc.);
 - d. generic or commonly used names (e.g., "event", "mother", "lawyer", "friend", "state school");
 - e. simple city names without further indications (e.g., "Rome" to mean the "Municipality of Rome");
 - f. names of public offices not accompanied or replaced by the indication of the body to which they belong to (e.g., "Registry" without further indication of the sender's Municipality).
- 2.5. Alias that exalt any form of violence and offend human dignity are not permitted. Alias with references that could harm minors are not permitted. Alias must comply with trademark regulations.
- 2.6. Aliases that refer to public bodies and institutions, of any nature, whether of a generic type, containing words such as: "Ministry", "Municipality", "Hospital", "Interno", "Roma", "San Camillo", etc. will be reserved exclusively for the public bodies and institutions and cannot be associated with other persons.
- 2.7. The Alias cannot convey, through the string of alphanumeric characters transmitted in the CLI, a mere information content and not the identity of the sender of the SMS or corporate MMS (e.g., "Greetings", "How are you?").
- 2.8. The Alias cannot consist of more than 11 characters. Please note that the use of the "€" character corresponds to the use of 2 of the 11 characters.
- 2.9. Clients that have branded names can be used as an Alias (e.g., Genius Bar, GeekSquad).
- 2.10. Aliases that consist exclusively of numeric characters or alphanumeric characters that can simulate a number in national or international format are not allowed, in accordance with the provisions of art. 10, paragraph 4, of resolution 12/23/CIR.
- 2.11. The following characters can be used in Alias:

- a. lowercase letters of the international alphabet must be used and uppercase:
 - ABCDEFGHIJKLMNOPQRSTUVWXYZ (HEX codes 41 to 5A respectively)
 - abcdefghijklmnopqrstuvwxyz (HEX codes 61 to 6A respectively);
- b. the accented lowercase letters present on the Italian keyboard can be used:
 - è é ù ì ò (HEX codes from 04 to 08 respectively)
 - à (code HEX 7F)
- c. digits 0 to 9 can be used:
 - 0123456789 (HEX codes from 30 to 39 respectively);
- d. common punctuation marks can be used:
 - SP (space: code HEX 20)
 - ! (exclamation point: code HEX 21)
 - ' (apostrophe: code HEX 27)
 - , (comma: HEX 2C code)
 - . (point: HEX 2E code)
 - : (colon: HEX 3A code)
 - ; (semicolon: HEX 3B code)
 - ? (question mark: HEX 3F code)
 - " (quotation marks: code HEX 22)

Common punctuation marks, cannot be preceded by the space character. In addition, Consecutive use of spaces is not allowed.

- e. An Alias that uses quotation marks must use two. The first quotation mark must be the first character of the Alias and the second quotation mark must be the last character of the Alias. Quotation marks cannot be precede or followed by the space character.
- f. common currency symbols can be used:
 - € (euro: two-character code HEX 1B 65)
 - £ (sterling: code HEX 01)
 - \$ (dollar: code HEX 02)
- g. common mathematical symbols can be used:
 - % (percentage: HEX code 25)
 - ((opening round bracket: HEX code 28)
 -) (closing round parenthesis: code HEX 29)
 - + (plus: HEX 2B code)
 - - (minus or even hyphen: 2D HEX code)
 - = (equal: 3D HEX code)
- h. the following internet symbols may be used:
 - @ ("at": code HEX 00)
 - _ (underlined or "underscore": code HEX 11)
 - # (hash or "hash": HEX code 23)
 - & (and: HEX code 26)
 - * (asterisk or "star": HEX 2A code)

2.12. Aliases cannot start or end with a space character.

MISCELLANEOUS PROVISIONS

- 3.1. The Client is responsible for providing Aliases that comply with this Code of Conduct in order for CM.com to be permitted to register the Alias in the Alias Registry managed by AGCOM.
- 3.2. In order for CM.com to register an Alias the Client must provide CM.com with registration data which includes;
 - a. the name of the Client;
 - b. tax VAT code;
 - c. full address;
 - d. e-mail address (namely a certified PEC);
 - e. contact telephone number;
 - f. the chosen Alias.
- 3.3. Aliases can be used after registration and formal approval by AGCOM.