

Information on the processing of personal data for the purposes of the provision of proactive services pursuant to Articles 13 and 14 of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR)

Personal data controller: The data controller is the company Informatica South Tyrol S.p.A at Via Crispi 1, 39100 Bolzano, e-mail: informatica@provincia.bz.it; PEC: formatik.informatica@pec.prov.bz.it

In compliance with Resolution No. 30 of the Provincial Council of 2 February 2024, SIAG acts as data controller for the processing of personal data (i) within the scope of the computer identification and authentication procedures to the myCIVIS portal and (ii) for activities related to the procedures for the provision of myCIVIS portal functions, including proactive services.

The Province is the data controller of personal data processed for the purposes of providing and maintaining the myCIVIS portal, providing support services, and monitoring and verifying the level of user satisfaction.

Data Protection Officer (DPO): The contact details of the DPO of the Controller are as follows: e-mail: dpo@siag.it.

Purpose of processing: Personal data, processed for the purpose of providing proactive services on the myCIVIS portal, are processed by the Data Controller in full compliance with the principles of fairness, lawfulness, appropriateness and relevance of processing, as well as minimisation and necessity set out in the GDPR. In particular, after identification and computer authentication to the myCIVIS portal, data subjects can use the following proactive services:

- (i) transmission of proactive communications concerning upcoming deadlines, updates following changes in the status of services;
- (ii) sending personalised suggestions on digital public services provided by the relevant departments of the Autonomous Province of Bolzano/Bozen, as well as by local authorities and instrumental bodies, and potentially relevant functionalities;
- (iii) *advanced Service Desk* support services, which guarantee continuous and multi-level support, providing fast and accurate answers.

The legal basis for such processing is the explicit consent given by the Data Subjects pursuant to Article 6(1)(a) of the GDPR.

In compliance with the data protection legislation, data subjects are guaranteed the right to revoke the aforementioned consent at any time. Failure to provide consent, or subsequent withdrawal of consent, does not in any way affect access to and use of the functions of the myCIVIS portal, nor access to public services. However, in the absence of the aforementioned consent, the user cannot benefit from the proactive services.

Persons authorised and specifically instructed by the Data Controller and external data processors, if any, in accordance with Article 2-*quaterdecies* of Legislative Decree No. 196 of 30 June 2003, as well as system administrators identified and appointed in accordance with the Order of the Data Protection Authority of 27 November 2008, may access personal data for the aforementioned purpose.

Where provided for by European, national or provincial legislation, data may be processed for scientific or historical research or statistical purposes, subject to the application of appropriate safeguards such as data minimisation, pseudonymisation or anonymisation, in accordance with Article 89 of the GDPR.

Data types and origin: For the purpose of the proper functioning of the proactive services, the following personal data and information concerning the data subjects are processed:

- a) common personal data (e.g. first name, surname, date and place of birth, tax code, telephone number and e-mail address) as referred to in Article 4(1)(1) of the GDPR;
- b) personal data and information collected as part of the interactions made by data subjects with the public services associated with the portal;
- c) personal data and information collected in the context of interactions by data subjects with support services.

Personal data falling under the data categories set out in Articles 9 and 10 of the GDPR are not processed. Such personal data may only be processed if provided voluntarily by the user (i.e. web form).

Personal data and information collected during calls made through the telephone channels (call centres) of the myCIVIS support service are also not processed for the purpose of providing proactive services. In this regard, the myCIVIS portal automatically deletes registrations once the support activity has been completed.

The data controller adopts technical and organisational measures provided for by the legislation in force, which are adequate to guarantee a level of security appropriate to the type of data processed. Specifically, the controller adopts precise security measures to discourage the inclusion of personal data falling into the categories set out in Articles 9 and 10 of the GDPR.

Data processor: The controller may have recourse to specific entities, endowed with the necessary expertise, appointed as data processors, pursuant to Article 28 of the GDPR, who provide services instrumental to achieving the purposes set out in this policy.

Communication and recipients of data: The data are not disclosed to other public and/or private entities.

Data transfers: No further transfer of data to non-EU countries takes place.

Diffusion: Where the disclosure of data is compulsory in order to fulfil specific publicity obligations laid down by the law in force, the guarantees provided by legal provisions for the protection of personal data concerning the data subject remain unaffected.

Duration: Pursuant to Article 5(1)(e) of the GDPR, the personal data processed will be appropriately stored at the controller's premises for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed, in accordance with legal obligations and in the light of the 'Guidelines for the formation, management and storage of computerised documents' adopted by Determination No. 407/2020 by AgID.

The personal data and information relating to the data subject who has consented to the activation of proactive services are stored in the centralised data management platform of the myCIVIS portal until the data subject withdraws his or her consent. If consent is withdrawn, the aforementioned data and information shall be permanently and irreversibly deleted.

In any case, please note that if the data subject does not access the myCIVIS portal for a period of more than 24 months, the relevant personal data will be deleted.

Automated decision-making process: Data processing is not based on an automated decision-making process.

Rights of the data subject: Where applicable and in accordance with current legislation, the data subject may at any time request access to his/her data; if he/she considers them to be inaccurate or incomplete, he/she may request that they be corrected or supplemented; if the legal requirements apply, he/she may object to their processing, request their deletion or limitation. The application is available on the *Autonomous Province of Bolzano/Bozen - South Tyrol's* website in the *Transparent Administration - Other Content - Additional Data* section.

Remedies: In the event of failure to reply within 30 days from the submission of the request, unless a reasoned extension of up to 60 days is justified by the complexity or large number of requests, the data subject may lodge a complaint with the Data Protection Authority or appeal to the courts.

This information on the processing of personal data may be updated in order to comply with any national and European legislation on the processing of personal data and/or to adapt to the adoption of new systems, internal procedures or for any other reason that may be appropriate and/or necessary.