

Information on the processing of personal data carried out as part of the identification and authentication procedure on the myCIVIS portal of the CIVIS platform 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 are processed by the Controller in full compliance with the principles of correctness, lawfulness, appropriateness and relevance of processing, as well as minimisation and necessity as set out in the GDPR.

In particular, personal data are processed by the data controller for the purpose of enabling data subjects, both natural and legal persons, to access the myCIVIS portal, as well as to use its functions, including proactive services.

In particular, access to the myCIVIS portal of the CIVIS platform by the data subjects takes place in compliance with the regulatory and normative sources of the sector, such as, by way of example, Legislative Decree no. 82 of 7 March 2005 (CAD) and Determination no. 133 of the Agenzia per l'Italia Digitale of 11 May 2022, concerning "Operational Guidelines for the use of SPID services by minors", in the manner indicated below:

- (i) by means of SPID and CIE, pursuant to Article 64 paragraph 2-*quater* of the CAD. In particular, from the aforementioned authentication systems, the Portal acquires the personal data indicated in this notice;
- (ii) via eIDAS, in compliance with EU Regulation No. 910/2014;
- (iii) via eGov, as the provincial system for the management of digital identities alternative to SPID and CIE, with regard to non-EU non-resident natural persons and natural persons resident in EU countries where eIDAS is not used.

The legal basis of the aforementioned processing is the performance of a task carried out in the public interest or in the exercise of public authority vested in the data controller, pursuant to Article 6(1)(e) and (3)(b) of the GDPR, as well as Article 2-*ter* of Legislative Decree No 196 of 30 June 2003 and, in particular:

- (i) by Resolution No. 948 of the Provincial Council of 21 November 2025 on '*SIPAD - Integrated Support for Digital Acceleration Projects - Phase 1 (2025-2026)*';
- (ii) by Resolution No. 30 of the Provincial Council of 2 February 2024 concerning the '*Definition of SIAG's Ownership of the Processing of myCIVIS Authentication Data*';
- (iii) by Resolution No. 943 of the Provincial Council of 24 October 2023 concerning the '*Flagship Project - SIMPLY DIGITAL Digitalisation of the public entities of the Autonomous Province of Bolzano/Bozen 2023-2025*';
- (iv) by Resolution No. 743 of the Provincial Council of 11 October 2022, concerning '*Approval of the Memorandum of Understanding between the President of the Council of Ministers, the Minister for Regional Affairs and Autonomies, the Minister for Technological Innovation and Digital Transition and the Autonomous Province of Bolzano/Bozen concerning cooperation for the implementation of the Flagship Project "Digitisation of the public entities of the Autonomous Province of Bolzano/Bozen" and, specifically, PICT 4.1 "Management of relations with citizens": setting up of an IT system for the management of relations with citizens*';
- (v) by Resolution No. 202 of the Provincial Council of 29 March 2022 on the '*Digital Agenda for South Tyrol: Approval of the strategic document 'South Tyrol Digital 2022-2026'*';
- (vi) by Resolution No. 858 of the Provincial Council of 22 October 2019 on '*Internet Presence of the Provincial Administration - Reorganisation*'.

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 accessing the myCIVIS portal, the common personal data of data subjects are processed, such as personal data (name, surname, tax code, place and date of birth) and contact data (e-mail address, telephone number, PEC). With regard to non-resident non-EU natural persons and citizens of EU countries where eIDAS is not used, personal data from identity documents uploaded for the purpose of creating the eGov account (e.g. passport, visa, residence permit) are also processed.

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.

In particular, personal data relating to the computer identification and authentication procedure on the myCIVIS portal are stored in the portal's database for a period of 24 months after the user's last access to the portal.

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.