

Information on the processing of personal data carried out within the myCIVIS portal 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 Autonomous Province of Bolzano/Bozen at Silvius Magnago Square 1, Building 1, 39100 Bolzano/Bozen, e-mail: segreteria generale@provincia.bz.it; PEC: adm@pec.prov.bz.it

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.

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.

This does not affect the ownership of the processing of personal data carried out, for the purpose of providing public services, by the Departments of the Province, as well as the local authorities and instrumental bodies, each in relation to its own competences and institutional purposes.

Data Protection Officer (DPO): The contact details of the DPO of the Autonomous Province of Bolzano/Bozen are as follows: e-mail: rpd@provincia.bz.it; PEC: rpd_dsb@pec.prov.bz.it.

Purpose of processing: Personal data, processed within the framework of the myCIVIS portal of the CIVIS platform, are processed by the Data 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, data subjects, both natural and legal persons, access the myCIVIS portal in order to (i) use the functions of the myCIVIS portal; (ii) use the assistance services; (iii) subject to explicit consent issued pursuant to Article 6(1)(a) of the GDPR, use the proactive services (e.g., transmission of communications regarding potentially relevant deadlines and services); (iv) directly access one or more digital public services provided by the Departments of the Province, as well as of the Local Authorities and instrumental Bodies.

In order to promote the efficient provision of the myCIVIS portal's functionalities, within the public area of the CIVIS platform, any data subject, without the need for prior computer authentication, may be provided with general information regarding the platform itself and the related myCIVIS portal, as well as the public services available therein, and may benefit from (i) a digital human service, capable of instantly generating answers to questions posed by users regarding the platform, the portal and the public services available therein, without the processing of personal data; (ii) an assistance service, also through webforms, in which users' common personal data may be processed.

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 Article 8 of Law No. 150 of 7 June 2000 on '*Discipline of the information and communication activities of public entities*';
- (ii) by Resolution No. 948 of the Provincial Council of 21 November 2025 on '*SIPAD - Integrated Support for Digital Acceleration Projects - Phase 1 (2025-2026)*';
- (iii) 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*';
- (iv) 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*';
- (v) 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*";
- (vi) 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"*";
- (vii) 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.

The person in charge of the processing is the *pro tempore* Director of the Information Technology Department, at the seat of the same.

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 source: Data are collected from the data subjects, as well as from the following internal and external databases of the Province: (i) National Register of the Resident Population, (ii) Register of Companies, (iii) National Single Third Sector Register, (iv) Parix, (v) Openkat (land register, building register, geometric register).

Data types: The data collected are: (i) common user data (i.e., citizens or individuals acting on behalf of the company) such as personal data (i.e., first name, last name, date and place of birth, tax code) and contact data (i.e., e-mail address and mobile phone number); (ii) data and information relating to the user's educational and professional background (i.e., educational qualification, professional qualification and any additional documentation uploaded as certifications); (iii) personal data and information functional to the management of public services, such as procedures in draft and uploaded documents; (iv) personal data and optional information entered voluntarily by users.

The provision of data falling under the categories set out in Articles 9 and 10 of the GDPR is not required and can only be done on a voluntary basis.

Data Processor: pursuant to Article 28 of the GDPR, the Data Controller has appointed the company Informatica South Tyrol S.p.A. as Data Processor.

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

They may be communicated to: entities that provide services for the maintenance and management of the provincial administration's IT system and/or the institutional website of the Authority, also in cloud computing mode. The cloud provider Microsoft Italia Srl, supplier to the Province of the Office365 service, has undertaken under the existing contract not to transfer personal data outside the European Union and the countries of the European Economic Area (Norway, Iceland and Liechtenstein), without the adequate guarantees provided for in Chapter V of the Regulation.

The recipients of the above-mentioned data act as data controllers.

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, the personal data processed for the purpose of using the myCIVIS portal's functionalities are stored in the portal's special database for a period of 24 months from the data subject'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: Pursuant to current legislation, the data subject may at any time, upon request, obtain 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 are met, 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.