

Information on the processing of personal data carried out in the context of the myCIVIS portal service 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 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](mailto: rpd@provincia.bz.it); PEC: [rpd_dsb@pec.prov.bz.it](mailto: rpd_dsb@pec.prov.bz.it).

Purpose of processing: Personal data, which are processed for the purpose of providing assistance services on the myCIVIS portal, 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, within the myCIVIS portal, data subjects can make use of assistance services.

The myCIVIS assistance service is made available: (i) in the public area of the CIVIS platform, to any data subject without the need for a prior identification and authentication procedure; (ii) in the myCIVIS portal, subject to a prior identification and computer authentication procedure.

The support service is structured on digital channels (e-mail, webform, chat), telephone (call centre) and physical and virtual customer service desks (videocall), and is organised on several levels of competence and responsibility:

- L0 level (myCIVIS web portal), which offers information services based on artificial intelligence and automated assistance to provide users with direct and easy access to online public services;
- L1 level (CIVIS Service Desk), offering a central point of contact (SPoC - Single Point of Contact) with expert teams to handle complex requests and to coordinate digital tutors;
- L1 + level (DIGI POINT), offering physical territorial contact points with facilitation assistance as proximity support for citizens in accessing public entity digital services;
- Level L2 (Specialised Consultancy), which offers specialised consultancy to the relevant departments of the Province, as well as to local authorities and instrumentalities, and deals with particularly complex requests.

The assistance service makes it possible to: (i) efficiently manage requests for assistance from data subjects and the related management and resolution procedures; (ii) automate and speed up the working activities in charge of the service operators, reducing waiting times and increasing user satisfaction; (iii) subject to the consent of the data subject pursuant to Article 6(1)(a) of the GDPR, provide immediate and precise answers, based on the preferences and specific needs of each individual data subject, by means of personalised suggestions.

In order to promote the efficient delivery of the myCIVIS portal's functionalities, within the public area of the CIVIS platform, any data subject, without the need for prior computer authentication, can learn about can benefit from a digital human (virtual assistant) service, capable of instantly generating answers to questions posed by users concerning the platform, the portal and the public services available therein, without the processing of personal data, and from an assistance service, also via webform, in which users' common personal data can be processed.

In the myCIVIS portal:

- (i) if the Data Subject has subscribed to the proactive services, in the manner described in the privacy policy, the Virtual Assistant is able to suggest services of potential interest, on the basis of personal data and information relating to the user profile, available on myCIVIS or offered by the competent Departments of the Province, as well as by the Local Authorities and Instrumental Bodies;
- (ii) if the user has not subscribed to proactive services, the virtual assistant provides general and abstract information because: (i) it has no visibility of the personal data of the user making the request; (ii) it cannot use the information contained in the user profile when generating responses. The virtual assistant merely recognises the category to which the profile belongs (e.g. natural person or legal entity) in order to provide answers that are as relevant as possible.

In particular, through a web form, data subjects may request support both in dealing with any technical problems encountered when using the portal and in obtaining clarifications or in-depth information on specific issues of interest regarding the platform and the public services available therein. The web form consists of a text field that can be freely filled in by the user, in which a description of the problem encountered can be entered and attachments uploaded.

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:

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

- 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";
- 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'';
- 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 types and origin: For the purposes of the operation of the assistance service, common personal data, as referred to in Article 4(1) of the GDPR, entered by data subjects for the purpose of submitting the request for assistance (webform), such as personal data (first name and surname, tax code, VAT number) and contact data (e-mail address and, optionally, telephone number), as well as information entered in the field that can be freely filled in by the user (category, description and attachment), are processed.

The operation of the Virtual Assistant in the public area of the platform and in the myCIVIS portal does not involve the processing of personal data within the meaning of Article 4 of the GDPR, unless the Data Subject has consented to the activation of proactive services. Personal data may only be entered on a voluntary basis.

In any case, the virtual assistant, when processing answers to questions posed by users, merely provides general and abstract information about the platform, portal and public services. In this regard, it should be noted that the scope of the digital human's response is limited to the knowledge base provided by the Province. This approach ensures that answers are based solely on accurate and relevant information, reducing the risk of misinformation.

Personal data and information collected during calls made through the telephone channels (call centre) of the myCIVIS assistance service are processed only for the time strictly necessary to handle and resolve the request for assistance submitted by the person concerned.

In this context, (i) Level 1 operators may request the caller's personal data (first and last name and year of birth if the aforementioned data are not clearly understandable during the conversation) in order to enable the caller's identification and ensure the correct handling of the relevant requester; (ii) Level 2 operators may also request the caller's tax code, in order to ensure the correct identification of the caller, as well as to prevent identity errors that could affect the personal or administrative position of the person concerned. Alternatively, the Level 2 operator may use the One-Time Password (OTP) system, i.e. a temporary password generated for a single session, to verify the identity of the caller in real time. In such cases, the caller accesses the myCIVIS portal and the system, automatically, generates the OTP code, which must be communicated to the operator for the identification procedure to be correctly carried out.

It should be noted that Data Subjects using the call centre service of the myCIVIS portal are informed in advance of the processing described above by means of a specific audio information message, aimed at signalling the start of call recording.

Data processor: Pursuant to Article 28 of the GDPR, the data controller has appointed the company Informatica South Tyrol S.p.A. as personal 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 person concerned 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 processed for the purpose of providing the request for assistance are stored in a special database on the myCIVIS portal for the period of time equal to 24 (twenty-four) months from the conclusion of the support request management process.

With specific regard to the content of telephone conversations and any transcripts, it should be noted that the same is only made accessible to operators for the period necessary for the handling and resolution of the request for assistance. Once the support activity has been completed, the portal automatically deletes the registrations.

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 person concerned may at any time, upon request, obtain access to his or her data; if he or she considers them to be inaccurate or incomplete, he or she may request that they be corrected or supplemented; if the legal requirements are met, he or she may object to their processing, request their deletion or limit their processing. 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.