

**Information on the processing of personal data relating to the service operators of 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 Autonomous Province of Bolzano/Bozen at Silvius Magnago Square 1, Building 1, 39100 Bolzano/Bozen, e-mail: [segreteria generale@provincia.bz.it](mailto:segreteria generale@provincia.bz.it); PEC: [adm@pec.prov.bz.it](mailto:adm@pec.prov.bz.it)

The Province is the controller of personal data processed for the purpose of providing support services.

**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 relating to caregivers 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, the processing of personal data relating to operators is carried out for the purpose of enabling the proper performance of their work activities.

As part of the above-mentioned activities, operators use specific digital tools provided by the owner, offered by Microsoft Dynamics 365 (e.g. Copilot and Teams). In particular, the myCIVIS portal provides for the creation of a dedicated user profile for each operator, which aims to ensure the unambiguous identification of the same within the system, aimed at ensuring access to the functions strictly necessary to perform the assigned activities.

In this respect, operators can operate on several levels of competence and responsibility, such as:

- 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.

It should be noted that the assistance service does not provide for remote control measures of operators:

- no audio-visual or monitoring tools are used for the purpose of assessing individual productivity, in compliance with the relevant legal and regulatory sources;
- digital tools are only used to support operational efficiency and service quality, and not to control work;
- recordings of telephone conversations made by the operator may only be listened to between operators handling the same request for assistance, in compliance with the principles on the protection of personal data and in such a way as to prevent any form of discrimination or unlawful remote control;
- the operator is entitled to interrupt the recording and/or transcription of the call at any time if this is necessary in connection with the specific request for assistance.

The Province, as part of its administrative monitoring activities on the quality and efficiency of the portal: (i) does not carry out individual checks on the work of individual operators; (ii) only displays data aggregated according to special procedures, organised in reports and concerning exclusively metrics and indicators relating to technical and organisational profiles connected with the use and operation of the service.

The assistance service aims to provide innovative and effective technological tools to enhance the organisation of operators' back office activities, in order to increase the quality of the assistance service, as well as to improve the use of all digital public services provided by the provincial administration.

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 types and origin:** The personal data relating to operators processed within the myCIVIS portal are: personal data (name, surname), contact data (e-mail address, mobile phone number), as well as information relating to the organisation they belong to (e.g. territory, business unit).

**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.

It should be noted that information relating to the work activities of individual operators (e.g. daily reports on call durations, number of calls received, requests for help from other operators) is not retained.

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/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.