

Privacy Policy Italian Republic - Region of Sicily

1. Processing of personal data to which this policy is referred This policy is published in accordance with articles 13 and 14 of Regulation EU 2016/679 relating to the processing of data monitoring of the Health Authority in charge for reasons of public interest in the public health sector of which the extraordinary emergency ordinance n.5 of 13/3/2020 of the President of the Region of Sicily. The treatment is shaped in relation to the principles of decency, lawfulness, jurisdiction and frankness and protecting the privacy and the right of the person concerned in accordance with the law.

2. Subjects involved in the processing data The data controller is the Region of Sicily, Implementing Body Office ex OCDPC (Ordinance of the Head of Civil Protection Department) 630/2020, Via Gaetano Abela n.5, 90100 - Palermo (PA) telephone number +39091.7071975.

The responsible for the processing for problems of the application management via digital channel is Beta80 s.p.a. with address for service in Milano, via Socrate 41.

The responsible for the processing for the development and maintenance of the APP SiciliaSiCura is IES Solutions s.r.l. with address for service in Rome, via Monte Senario 98.

The responsible for the processing for particular technical tasks or Call Center services and virtual assistant is WebGenesys Srl with address for service in Catanzaro, Contrada mula Pardizzi snc.

3. Data Protection Manager The Data Protection Manager of the Region of Sicily may be contacted at dpo@regione.sicilia.it and dpo@certmail.regione.sicilia.it.

4. Source and types of personal data collected Personal data have been collected by Datacenter Tim of Rozzano. The personal data treated are:

- identifier personal data such as addresses, telephone numbers, e-mail addresses.
- data concerning the health.
- location data.

Since this Virtual Assistant is built to provide answers to questions related to Covid-19, the interactions are not user-specific. Therefore, as we are not dealing with user specific data to provide our services, we do not collect any personal information of our users, except the queries asked by them. Our primary goal in collecting this textual information is to improve our services.

But there is certain amount of information that is collected by the platforms and integrations our Virtual Assistant uses. This includes:

Language-code

Represents the language code used in conversations

Example: en-EN

Timestamp

Represents timestamp when the user makes a request to Virtual Assistant

Example: 2020-03-10T10:46:15Z

SessionId

A unique anonymous string of characters identifying the session

Example: XHerNKL5s10c

Query Input

Represents natural language text to be processed by the Virtual Assistant

Example: Holiday in Sicily

We only store the textual information (Query Input) to better our Virtual Assistant questions handling capacity and efficiency and also to ensure that the number of no match conversations is minimum. Other pieces of information mentioned above are necessary for the agents's functioning over various platforms. We never share the data with anyone. Data is collected solely for enhancing the response quality and the Virtual Assistant is built for the purpose of provides information about Covid-19 disease and info about the current situation in Sicily.

The only way this Virtual Assistant can identify a user is with the help of a sessionID which is a unique, anonymous string of characters which identifies their session. Users can close Google Assistant App or browser tab and log in again to generate a new sessionId. At this point Virtual Assistant will recognize the user as a new user in the next interaction.

If you have any questions or concerns about our Privacy Policy or data processing, or if you would like to reach out to us to report a possible breach of local privacy laws, please contact us at helpdesk@siciliasicura.com

5. Purpose and legal basis of data processing

The personal data you will supply are used in the scope of this processing to achieve the purposes concerning the Ordinance of the Ministry of the Health of the 21st February 2020. The legal basis of the processing is the safety of citizen's life in relation to the COVID-19 emergency, as well as a reason of public interest in the sector of public health (art. 9, paragraph 2, letter I of the GDPR).

6. Processing methods

Your data are processed in relation with the described purpose and with logics related to it, both in paper form and using digital and telematic tools, in accordance with the principles set in art. 5 of the Regulation EU 2016/679, in order to guarantee an adequate safety, including the protection against unauthorized or illegal processing, by adequate technical and organizational actions. On the basis of the data object of this report, The Region of Sicily will not assume any decision by completely automated processing, nor any automated profiling will be carried out.

7. Communication and dissemination of data The data could be processed for the purpose of this report by the subjects of point 2 and by people who are authorized by them. The data could be communicated in the cases and methods required by law. For the same purposes for which the data have been collected, they could be communicated to the Authorities who manage the COVID-19 emergency in Sicily defined by the data Controller.

8. Personal data retention For the purposes of the processing, data are kept at Datacenter TIM, for the time strictly necessary to the management of the COVID19 epidemiological emergency, in full respect of the current legislation. The data could be comprehensively deleted by the user and they will be in any way deleted 16 days after the day of departure from the territory of the Region of Sicily or after 60 days of inactivity since the last login.

Moreover, for the same purposes the data will be processed and kept by the competent health authorities for the time necessary to guarantee the hygiene and public health, with particular reference to the COVID19 health emergency, in full respect of the current legislation. At the end of their use, the data will be subjected to the rules governing the conservation and discard of archival documents of the Region of Sicily and of the competent health authorities. If the data would be used for the ascertaining responsibility in case of hypothetical crimes, the terms for the cancellation are suspended within the law.

9. Rights of data subject You may exercise your rights referred to in articles from 15 to 22 of Regulation EU 679/2016 on your personal data by sending a communication to the Data Controller at one of the addresses of point 1. You may:

- request confirmation or not about the existence of your personal data processing;
- request the access to it;
- request their correction;
- request their cancellation, without prejudice that this right is not applied for the fulfillment of a legal obligation which requires the processing expected by the EU law or by a Member State to which the Data Controller is subject or for the execution of a task carried out in the public interest or in the scope of public powers of which the Data Controller is assigned;
- request the limitation of the processing;

- object to the processing;
- request the data portability, without prejudice that this right is not applied for the processing necessary for the execution of task carried out in the public interest or in the scope of public powers of which the Data Controller is assigned;

If you wish to make a complaint you can also submit it to the personal data protection Authority, piazza Venezia n. 11, scala B, 00187 Rome. Update 4th June 2020 Data controller: Region of Sicily, Implementing Body Office ex OCDPC (Ordinance of the Head of Civil Protection Department) 630/2020, Via Gaetano Abela n.5, 90100 - Palermo (PA)

Conditions of use

The user declares to have understood that:

- SiciliaSiCura is not an emergency service and it does not substitute the Emergency Number (NUE) 112 which has to be called by the citizen in case of a health emergency.
- He/she could be directly contacted by the Emergency Manager for further information or explanation.
- The inappropriate use of Sicilia SiCura and the sending of mendacious information could be reported to the Competent Authority.
- SiciliaSiCura does NOT carry out any active tracking of the user but it uses the geolocation of the user in order to verify his/her presence in the territory of the Region of Sicily and to send, ONLY during the update, the user position who could always decide NOT to be geolocated by SiciliaSiCura.
- It is possible to delete the own data using the APP directly. It won't be possible to reactivate user data in any way after the cancellation.
- Uninstallation from the device does not cancel personal data. It is necessary to use the function "Request deletion of data by the Service" using the "settings" menu before removing SiciliaSiCura from the device.

Consent and Acceptance of the Conditions of use

The undersigned agrees to the fact that the Data User implements the activities described above for which the consent is the legal bases of the processing and, at the same time, he/she accepts the conditions of use described above.