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Injunction order against Atac s.p.a. - July 22, 2021

Record of measures

n. 293 of 22 July 2021

THE GUARANTOR FOR THE PROTECTION OF PERSONAL DATA

IN today's meeting, which was attended by prof. Pasquale Stanzione, president, Professor Ginevra Cerrina Feroni, vice president, dr. Agostino Ghiglia and the lawyer Guido Scorza, members, and the cons. Fabio Mattei, general secretary;

GIVEN the Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data and which repeals Directive 95/46 / EC, "General Data Protection Regulation" (hereinafter the "Regulation");

GIVEN the legislative decree 30 June 2003, n. 196, "Code regarding the protection of personal data", as amended by Legislative Decree 10 August 2018, n. 101, containing provisions for the adaptation of national law to the Regulation (hereinafter the "Code");

GIVEN the Regulation n. 1/2019 concerning internal procedures with external relevance, aimed at carrying out the tasks and exercising the powers delegated to the Guarantor for the protection of personal data, approved by resolution no. 98 of 4 April 2019, published in the Official Gazette n. 106 of 8 May 2019 and in www.gdpd.it, doc. web n. 9107633 (hereinafter "Regulation of the Guarantor no. 1/2019");

GIVEN the documentation in the deeds;

HAVING REGARD to the observations of the Office made by the Secretary General pursuant to art. 15 of the Guarantor Regulation n. 1/2000 on the organization and operation of the office of the Guarantor for the protection of personal data, in www.gdpd.it, doc. web n. 1098801;

SPEAKER Attorney Guido Scorza;

1. Introduction

From a report submitted to the Authority in the month of XX, it emerged that for the issue of the badges certifying the payment of parking in the parking lots of Roma Capitale, it is required to insert, in the appropriate parking meters, the license plate of

the vehicle for which make the payment.

2. Preliminary activity

In relation to the case, an investigation was launched, during which an inspection was also carried out in collaboration with the special privacy unit of the Finance Police.

From the assessment it emerged that, with the resolution of the Capitoline Council no. XX del XX, Roma Capitale (note n. XX of the XX, attached to the note of Roma Capitale n. XX) has entrusted to Atac s.p.a. (hereinafter, the company), complementary services to scheduled public transport, relating to the management of exchange parking lots and parking on the road for the period XX (extended until the XX by virtue of the Deliberation of the Capitoline Assembly no. XX).

At the proposal of the company (note dated XX, attached to the aforementioned resolution), some parking meters under management have been subject to a technological adaptation, in order to allow payment also by debit / credit cards, the personalization of payment by inserting the vehicle license plate (with the consequent non-need for the user to display the payment coupon) and the possible activation of additional services on the parking meter (eg payment of sanctions / taxes, purchase / renewal of public transport tickets). This phase of "modernization" was completed in the month of X, from which the new parking meters became operational (note no. XX of the XX).

As regards the functional architecture of the system, Atac s.p.a has created, also on behalf of Roma Capitale, the data controller, a centralized system that collects information (time, date of start and end of parking, the amount paid and the license plate) relating to the payment of the parking made via apps made available by various operators (myCicero, easyPark, etc.) or "evolved" Pay & Go parking meters (managed by the company Parkeon s.r.l., now Flowbird Italia s.r.l.) and by make them available to both traffic auxiliaries (of Roma Capitale as authorized to process data) for the purpose of verifying payment for parking (using the E-Multe-S app, installed on company smartphones) , and to internal staff, for administrative management purposes, as authorized to process data pursuant to art. 29 of the Regulation.

During the inspection, it was ascertained that the company participated in the treatment in question without its role, as "data controller", being adequately defined before the start of the treatment. Similarly, the participation of Flowbird Italia s.r.l. is verified, without its role, as "(sub) data processor", being adequately defined in compliance with the provisions of the personal data protection regulations (Article 28 of the Regulation). In particular, the appointment of the company Atac s.p. as data processor, took place during the investigation, on XX (annex 5 minutes XX). In any case, it is noted that the company with note

no. XX of the XX, had already requested the “formalization [...] of the appointment, as external manager with reference to the service contract with Roma Capitale”.

Finally, with reference to the obligation to draw up, before the start of the processing, a register of the processing activities carried out pursuant to art. 30 of the Regulations, the company stated that "the document in question is being drawn up ... the register of processing activities as owner and manager is being prepared, the second will also include the processing in question ... "(Minutes XX).

As regards the number of interested parties involved, the treatment in question regards, broadly speaking, all those who use the parking service in the territory of the Municipality of Roma Capitale (residents and non-residents). During the checks carried out (table dbo.stop start, minutes of the XX, annex 9) it emerged that, up to the XX, 8,600,000 data relating to the stops made by the vehicles have already been recorded in the system.

Lastly, as regards the security measures concerning both aspects of a technological nature and aspects of an organizational nature, the adoption of which is up to both the owner, Roma Capitale, and the company, as data processor pursuant to art. 5, par. lett. f) and art. 32 of the Regulations, it was ascertained (minutes XX) that:

- some data flows “to and from” the ATAC system do not use secure communication channels. In particular, to check that the parking has been paid, the traffic auxiliaries access the ATAC system with the "E-Multe-S" app which communicates with the server in question using the http protocol (minutes of the 20th), by transmitting the data in clear text;

- the authentication system does not guarantee suitable security measures regarding the format of the passwords and their storage in the database. The passwords used for the authentication of the auxiliaries are in fact stored in clear text within the database (minutes of the XXth) and made up of 5 characters, as confirmed during a simulation of use of the app in question (minutes of the XXth).

- furthermore, no mechanism has been implemented that allows the traceability of the operations carried out (application log) by system users on personal data, whether they are system administrators or back office operators and traffic auxiliaries (minutes of the XXth). This deficiency excludes the possibility of carrying out ex post checks on the work of employees with respect to the computerized processing of a large volume of data relating to a large number of interested parties, data that can potentially lend themselves to fraudulent uses to their detriment, allowing to detect the status absence from home or presence in a certain area of the city in a given period of time.

With a note of the XX (prot. No. XX), the Office, on the basis of the elements acquired, notified the company, pursuant to art. 166, paragraph 5, of the Code, the initiation of the procedure for the adoption of the measures referred to in art. 58, par. 2, of the Regulation, inviting the company to produce defensive writings or documents to the Guarantor or to ask to be heard by the Authority (art. 166, paragraphs 6 and 7, of the Code; as well as art. 18, paragraph 1, of law n. 689 of 11/24/1981). With the aforementioned note, the Office found that the company carried out the processing of personal data collected through the new parking meters installed in the area, without its role as "data processor" previously defined by Roma Capitale, data controller and, therefore, in the absence of a condition of lawfulness, without having contributed, on the basis of their specific technical skills, to adopt suitable security measures and without having adopted the treatment registers, in violation of articles 5, 6, 30 and 32 of the Regulation.

With a note of the XX, the company stated that:

- "failure to designate pursuant to art. 28 of the GDPR was caused by the failure to formalize ATAC as data processor by the Municipality of Rome. Despite the repeated reminders formulated by ATAC to the Municipality of Rome, in fact, the latter did not formally designate its investee company as data processor (see note no. XX of the XX in which ATAC requested the formalization of its role);
- "ATAC is a public company wholly owned by the Municipality of Rome which carries out, among the many activities at the service of the Municipality itself: the design of networks and mobility systems, the design, construction and management of transport lines, operational management of the public transport service, the unitary management of the integrated tariff system, the management of ticketing systems, also by entrusting them to third parties and the management of parking and complementary activities. However, the treatments subject to examination by the Guarantor are located precisely in the execution of the aforementioned public transport activities, as well as in the fulfillment of the public function of ascertaining and repressing administrative offenses as delegated by the Municipality of Rome. It is then understood how, even in the absence of the formalization of its role by the Municipality of Rome, if ATAC had refrained from carrying out the processing of user data, a paralysis of the local public transport service and management would have resulted. of the stop, and therefore with all evidence of the entire city of Rome;
- "on XX the agreement was finalized pursuant to art. 28 of the GDPR between ATAC and Flowbird Itali s.r.l. with the designation of the latter as sub-processor of the personal data acquired by the parking meters regarding the issue of parking

tickets ";

- "Attached is also the Register of the person responsible for the processing of personal data..., in execution of the Service Contract signed on the 20th with Roma Capitale and approved with the Deliberation of the Capitoline Council no. XX) ".

In addition, with regard to the security measures adopted, a "declaration on the security measures adopted" (Annex 11) was provided in an annex to the defense briefs, from which it emerges that, starting from the month of XX (ie after the 'initiation of the investigation by the Guarantor), the company has implemented the following measures:

- "identification of users through the use of personal passwords with a minimum length of 8 characters subject to encryption;
- system log at the level of access to the database through the registration of both successful accesses and unsuccessful attempts;

- application of the digital certificate on the communication channel between the smartphone of the auxiliary and the Atac server (use of the https protocol);

- one-way encryption of application passwords with SHA2_256 hash algorithm;

- implementation of the password change of the agents with expiration of three months;

- [...] new way of managing the scheduling of services concerning the control on the territory carried out by the Traffic

Auxiliaries of the tolled parking through the use of a new platform owned by ATAC (GTP-Sosta). [...] The aforementioned

platform is able to assign daily routes to be verified on the basis of predetermined weekly frequencies in compliance with the

quality objectives indicated in the Service Contract. Through GTP-Sosta, in an automated and random manner, the Traffic

Auxiliaries are therefore assigned to the "walkways" (service routes), so that the teams are always composed of different

Traffic Auxiliaries for different walkways but still belonging to the same shift and garrison . The adoption of this safety measure

excludes the possibility that the Traffic Auxiliaries always travel the same route assigned to them to check the parking and so

they can detect the same number plates of the cars that eventually should always park in the same place / area ".

The hearing required pursuant to art. 166, paragraph 6, of the Code, during which the company declared, among other things,

that it had undertaken a path to acquire the ISO 27001 certification and that, on XX date, it had completed the activity of

drawing up the registers of processing activities.

3. Outcome of the preliminary investigation

According to the rules on the protection of personal data, public subjects (such as Roma Capitale, the data controller in

question, can process the data only if necessary "to fulfill a legal obligation to which the data controller is subject" or "for the execution of a task in the public interest or connected to the exercise of public authority vested in the data controller "(art. 6, par. 1, lett. c) and e) of the Regulation). In this context, the regulation of parking and paid parking is part of the institutional activities entrusted to local authorities.

Even in the presence of a condition of lawfulness, in any case, the data controller (Roma Capitale) is in any case required to respect the principles of data protection, including those of "lawfulness, correctness and transparency", "limitation of conservation "and" integrity and confidentiality "on the basis of which the data are" processed in a lawful, correct and transparent manner towards the interested party "," kept in a form that allows the identification of the interested parties for a period of time not higher than the achievement of the purposes for which they are processed "and" processed in such a way as to guarantee adequate security of personal data, including the protection, by means of adequate technical and organizational measures, from unauthorized processing "(Article 5, par. 1 , letters a), e) and f), of the Regulation).

3.1 The data processing carried out by the company

Pursuant to art. 28 of the Regulation, the owner may also entrust processing to third parties who present sufficient guarantees on the implementation of technical and organizational measures suitable to ensure that the processing complies with the regulations on the protection of personal data ("data processors"). In this case, "the processing by a manager is governed by a contract or other legal act pursuant to the law of the Union or of the Member States, which binds the manager to the owner and which stipulates the subject matter and the duration of the processing, the nature and purpose of the processing, the type of personal data and the categories of data subjects, the obligations and rights of the owner "(Article 28, paragraphs 1 and 3, of the Regulation).

As emerged during the investigation, the processing of the data in question, carried out by the company on behalf of Roma Capitale, was initiated without the role being governed pursuant to art. 28 of the Regulations, as the service contract of the XXth (see resolution of the Giunta Capitolina n. . 28 of the Regulation (see spec. Par. 3).

Not having been identified as data processor and not having been indicated by the company specific conditions that legitimized the processing of personal data, it must be concluded that the same was carried out in the absence of the conditions of lawfulness provided for by the Regulations and the Code, as previously clarified by the Guarantor with regard to similar cases (see provision no. 161 of 17 September 2020, web doc. 9461321; provision no. 281 of 17 December 2020, web doc. 9525315;

Guidelines "on the concepts of owner and manager of the treatment in the GDPR "n. 07/2020, in particular note 35).

While acknowledging favorably that the company had asked the owner to be designated as data processor (note no. XX of the XX), the circumstance that the processing was provided for in the contract with Roma Capitale for the provision of transport "services of public interest".

Art. 6, par. 1, lett. e) of the Regulation, in fact, admits the processing if necessary "for the execution of a public interest or connected to the exercise of public authority vested in the data controller", thus legitimizing the "data controller" (Roma Capitale), invested with a task of public interest, to process the data for this purpose and not other subjects who process the data on behalf of the owner without assuming, in this regard, the role of person in charge of the processing of personal data. Therefore, in the absence of the designation as responsible for the processing of personal data (Article 28 of the Regulation) by the owner and no other conditions have been identified by the company that may legitimize the processing of personal data of users of the service in question, the processing carried out on behalf and in the interest of Roma Capitale appears to have been carried out by the company in the absence of a suitable legal basis and therefore in violation of Articles 5, par. 1, lett. a) and 6 of the Regulations.

3.2 The obligation to draw up records of processing activities

The Regulation provides, among the general obligations connected to the processing of personal data, the obligation, for each data controller and data processor (for the activities carried out on behalf of the data controller), to draw up the "registers of processing activities "(Article 30 of the Regulation).

On the basis of what was declared by the company (minutes of the XXth), the failure to adopt the "treatment registers" was ascertained.

These tools, suitable for providing an updated picture of the treatments in place within your organization and / or the treatments carried out on behalf of the data controller, are essential to assess the compliance of the treatments with the regulations on the protection of personal data and therefore they are preliminary to the start of the same.

Therefore, while taking note of the process of drawing up the registers initiated after the inspection by the Guarantor (note no. XX of the XX, the violation of Article 30 of the Regulation is noted.

3.3 Data security

According to the Regulation, personal data must be "processed in such a way as to guarantee adequate security of personal

data, including protection, by means of appropriate technical and organizational measures, from unauthorized or unlawful processing and from loss, destruction or damage. accidental "(art. 5, par. 1, lett. f), of the Regulations).

Art. 32 of the Regulation places both the owner and the manager in charge - taking into account the state of the art and the implementation costs, as well as the nature, object, context and purposes of the processing, as well as the risk - the adoption adequate technical and organizational measures to guarantee a level of safety appropriate to the risk.

As previously clarified by the Guarantor, although the data controller is required to process the data in accordance with the instructions given by the owner, certain obligations are also placed directly on the person in charge (see provision no.48 of 11 February 2021 , web doc. no. 9562831).

In particular, if on the one hand it is up to the owner the obligation to instruct and direct the data controller regarding the security measures to be adopted, on the other hand the manager, also based on the specific technical skills, must show autonomy in proposing the adoption of adequate measures especially in the event that the processing impacts on a large number of data subjects, as in the case in question.

The methods of processing ascertained, however, highlight the failure by Roma Capitale, as the data controller (against whom a specific provision is simultaneously adopted) and by the company, of technical and organizational measures suitable to guarantee a level of security adequate to the risks presented by the processing of the personal data in question, in violation of art. 5 par. 1 letter f) and art. 32 of the Regulation.

4. Conclusions

In light of the aforementioned assessments, it is noted that the statements made by the company □ the truthfulness of which one may be called to respond pursuant to art. 168 of the Code □ although worthy of consideration, they do not allow to overcome the findings notified by the Office with the act of initiation of the procedure and are insufficient to allow the filing of this procedure, however, none of the cases provided for by the art. 11 of the Guarantor Regulation n. 1/2019.

From the checks carried out on the basis of the elements acquired, also through the documentation sent, as well as from the subsequent evaluations, the non-compliance of the treatments carried out by the company on behalf and in the interest of Roma Capitale concerning the data collected through the new parking meters was ascertained. installed on the territory. The violation of personal data, object of the investigation, took place in full force of the provisions of the Regulation and the Code, as amended by Legislative Decree No. 101/2018, and therefore, in order to determine the regulatory framework

applicable under the time profile (art. 1, paragraph 2, of the l. 24 November 1981, n. 689), these constitute the provisions in force at the time of the committed violation, which took place starting from the month of XX.

The preliminary assessments of the Office are therefore confirmed and the unlawfulness of the processing of personal data carried out by the company from the month of XX is noted, as it occurred in the absence of a condition of lawfulness, in the absence of fulfillment of the obligation to draw up a register of the processing, as well as in the absence of technical and organizational measures suitable to guarantee a level of security adequate to the risk presented by the processing, in violation of Articles 5 par. 1 letter a), 6, 30 and 32 of the Regulation.

The violation of the aforementioned provisions makes the administrative sanction applicable pursuant to art. 58, par. 2, lett. i), and 83, para. 4 and 5, of the same Regulation, as also referred to by art. 166, paragraph 2, of the Code.

5. Corrective measures (Article 58, par. 2, letter d), of the Regulation)

With regard to the security measures implemented to date, taking into account the statements made by the company, some critical issues remain.

First of all, the adoption of the new GPT system as an organizational measure aimed at precluding that the single auxiliary does not exercise frequent (in a physical sense) control over the same plates due to the rotation in terms of zones / districts does not solve the critical issues, already object of dispute, relating to the absence of recording functionality of the work of individual users nor, even less, of identifying anomalous behavior (through specific alerts).

In relation to storage times, without prejudice to the aspects relating to the failure to argue the reasons for which ATAC, in agreement with Roma Capitale, the data controller, has chosen to make the data of the plates for which the payments date back to "unintelligible" a period longer than 60 days, the security measure implemented cannot be considered suitable for the reasons indicated below.

The storage for an indefinite time of the computer fingerprints of the values of the number plates calculated by applying the MD5 hash function, referred to as "one-way encryption" for the "anonymization" of the data, is not very reliable as it allows easy identification and correlation, which represent two of the main risks affecting these techniques.

More precisely, starting from a plate it is possible to calculate its hash and search for all occurrences in the database, thus allowing the historical reconstruction of all payments made, and consequently of all the stops made.

For these reasons, also taking into account the size of the set of possible plates (consisting of two letters, three numbers and

two letters), the computational simplicity of the algorithm used and the scarcity of the technological resources necessary to trace the clear data, the technique used is not suitable

It is therefore considered necessary to implement technical security measures that allow the traceability of the operations carried out (application logs) by users on the personal data that allow Atac s.p.a. to verify ex post the work of its employees with respect to the computerized processing of a large volume of data relating to a large number of interested parties, data that can potentially lend themselves to fraudulent uses to their detriment, allowing to detect the state of absence from home or presence in a specific area of the city in a given period of time. It is also considered necessary to define, in agreement with the data controller, the retention times of the data relating to the plates and the consequent technical measures to protect the stored data, bearing in mind that the robustness of the measures is directly proportional to the extent of the retention time period.

Having said that, it is considered necessary, pursuant to art. 58, par. 2, lett. d) of the Regulations, to order Atac s.p.a, within thirty days of notification of this provision, to adopt, in agreement with the data controller:

- recording functions (application logs) of the work of individual users, whether they are system administrators or back office operators and traffic auxiliaries, and functions for identifying anomalous behavior (through specific alerts) in order to verify ex post the the work of its employees with respect to the computerized processing of a large volume of data relating to a large number of interested parties;
- suitable security measures to protect the information stored consistently with the maximum retention times chosen.

Pursuant to art. 157 of the Code, the company must also communicate to this Authority which initiatives have been undertaken, also in agreement with the data controller, in order to implement the provisions of this provision and in any case to provide adequately documented feedback. , within thirty days of notification of this provision.

6. Adoption of the injunction order for the application of the pecuniary administrative sanction and ancillary sanctions (articles 58, par. 2, lett. l and 83 of the Regulation; art. 166, paragraph 7, of the Code)

The Guarantor, pursuant to art. 58, par. 2, lett. i), and 83 of the Regulations as well as art. 166 of the Code, has the power to "inflict an administrative pecuniary sanction pursuant to Article 83, in addition to the [other] [corrective] measures referred to in this paragraph, or instead of such measures, depending on the circumstances of each single case "and, in this context," the College [of the Guarantor] adopts the injunction order, with which it also disposes with regard to the application of the ancillary

administrative sanction of its publication, in whole or in excerpt, on the website of the Guarantor pursuant to Article 166, paragraph 7, of the Code "(Article 16, paragraph 1, of the Guarantor Regulation no. 1/2019).

In this regard, taking into account art. 83, par. 3, of the Regulations, in this case the violation of the aforementioned provisions is subject to the application of the same administrative fine provided for by art. 83, par. 5, of the Regulation.

The aforementioned administrative fine imposed, depending on the circumstances of each individual case, must be determined in the amount, taking into account the elements provided for by art. 83, par. 2, of the Regulation.

In this regard, the collaboration that the company has expressed in order to remedy the violation and mitigate its possible negative effects was favorably considered (notes no. XX of the XX, no. XX of the XX) by completing the preparation of the registers of the processing activities and cooperating with Roma Capitale - data controller - also as regards the completion of certain obligations placed on the same owner, such as the provision of information to the interested parties. It should also be noted that the company had already requested in Roma Capitale the "formalization of the appointment as external manager" (note no. XX of the XX), demonstrating that it wishes to operate correctly, in accordance with the provisions in force, in relation to this profile.

Furthermore, there are no previous violations of the Regulations committed by the company and the non-malicious behavior of the company itself is highlighted.

On the other hand, it was considered that the processing of personal data collected through the new operational parking meters starting from the month of XX, took place in the absence of a specific condition of lawfulness, in the absence of security measures concerning both technological aspects and aspects of an organizational nature and involved all the subjects who made use of the paid parking service in the territory of Roma Capitale. As shown above, as of the 20th century, 8,600,000 data relating to vehicle stops have already been recorded in the system.

The violation was also brought to the attention of the Authority through a report.

Due to the aforementioned elements, assessed as a whole, considering that the data processing is still in progress, assessed the high number of interested parties involved, as well as the inadequacy of the measures adopted to date, which made it necessary to prescribe corrective measures, it is deemed necessary to determine pursuant to art. 83, par. 2 and 3, of the Regulations, the amount of the pecuniary sanction, provided for by art. 83, par. 5, lett. a) of the Regulations, to the extent of € 400,000.00 (four hundred thousand) for the violation of Articles 5, par. 1, lett. a) and f), 6, 30 and 32 of the Regulation as a

pecuniary administrative sanction deemed effective, proportionate and dissuasive pursuant to art. 83, par. 1, of the same Regulation.

Taking into account the number of data subjects involved in the treatment in question and the lack of adoption of adequate technical security measures, it is believed that the ancillary sanction of the publication on the website of the Guarantor of this provision, provided for by art. 166, paragraph 7 of the Code and art. 16 of the Guarantor Regulation n. 1/2019.

Finally, it is believed that the conditions set out in art. 17 of Regulation no. 1/2019.

WHEREAS, THE GUARANTOR

declares illegal the conduct of Atac s.p.a., for the violation of articles 5, 6, 30 and 32 of the Regulation, within the terms set out in the motivation,

ORDER

ad Atac s.p.a, in the person of the pro-tempore legal representative, with registered office in Via Prenestina, 45 - 00176 Rome - VAT number 06341981006 - to pay the sum of € 400,000.00 (four hundred thousand) as a pecuniary administrative sanction for the violations mentioned in the motivation; it is represented that the offender, pursuant to art. 166, paragraph 8, of the Code, has the right to settle the dispute by paying, within 30 days, an amount equal to half of the sanction imposed;

INJUNCES

to Atac s.p.a.

a) to pay the sum of € 400,000.00 (four hundred thousand) - in the event of failure to settle the dispute pursuant to art. 166, paragraph 8, of the Code, according to the methods indicated in the annex, 17 within thirty days of notification of this provision, under penalty of the adoption of the consequent executive acts pursuant to art. 27 of the l. n. 689/1981;

b) pursuant to art. 58, par. 1, lett. a), of the Regulations, and of art. 157 of the Code, to communicate which initiatives have been undertaken, also in agreement with the data controller, in order to implement the provisions of point 5) and in any case to provide adequately documented feedback, no later than thirty days from the date of receipt of this provision. Failure to respond to a request pursuant to art. 157 of the Code is punished with an administrative sanction, pursuant to the combined provisions of art. 83, par. 5, of the Regulation and 166 of the Code.

HAS

the publication of this provision on the website of the Guarantor, pursuant to art. 166, paragraph 7, of the Code and art. 16,

paragraph 1, of the Guarantor Regulation n. 1/2019;

the annotation of this provision in the internal register of the Authority, provided for by art. 57, par. 1, lett. u), of the Regulations, violations and measures adopted in compliance with art. 58, par. 2, of the Regulation.

Pursuant to art. 78 of the Regulation, of art. 152 of the Code and 10 of Legislative Decree no. 150/2011, against this provision, it is possible to appeal before the ordinary judicial authority, under penalty of inadmissibility, within thirty days from the date of communication of the provision itself or within sixty days if the applicant resides abroad.

Rome, July 22, 2021

PRESIDENT

Stanzione

THE RAPPORTEUR

Peel

THE SECRETARY GENERAL

Mattei