Materiál Ministerstva vnitra

MINISTERSTVO VNITRA ČESKÉ REPUBLIKY

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Obsah

Evidence entities

Description of subject records

The Linked Data Pool is based on the exchange of data on uniquely identifiable subjects and objects. When registering, managing and linking data, it is essential to use the designated identifiers correctly and not to misuse previously registered identifiers.

An essential service that is part of the development of the linked data pool services is the service that returns the AIFO (agency identifier of an individual) for the current and historical document number and type. This service is necessary to replace persistent and meaningful identifiers such as the Birth Number as an identifier of a natural person not only in public administration processes and documents, but also in the private sphere.

Identifiers of natural persons

The linked_data_fund sets out a set of binding architectural recommendations for both data exchange and data pool maintenance (data registration). This of course also applies to natural persons. Below is a table with an overview of the identifiers related to a natural person:

Name	Description	Examples	Used for
Agenda Identifier of a Natural Person (AIFO)	Identifier assigned by ORG for a given agenda and unique for the person and the agenda.	AIFO in the Population Registration Agenda, AIFO in the Driving Licence Agenda	Technical identifier for the purpose of unambiguous identification of a natural person in an agenda and as an identifier of a person during data exchange. It is only in the agenda, it is never provided or transmitted, it is translated exclusively through ORG.
Pseudonym from NIA (BSI)	Identifier assigned by NIA for each qualified service provider	BSI for citizen portal, BSI for CSSA portal, BSI for general teaching hospital	Special type of contact identifier for the purpose of unique identification of a natural person, which can be translated to AIFO against basic registers services.
Style Identifier (SI)	Unique identifier derived from a public document that can be used to identify a person when communicating with a public administration. Any liaison identifier must be in the ROB, except for the BSI.	Document type and number (OP, passport, driving licence)	Used in face-to-face or paper or electronic communication with the client, instead of or in addition to the CI. According to it, the translation is made to the CI for internal work in the agenda and AIS, and to the AIFO in the agenda for communication within the PPDF. The AIS then knows both the AIFO and the KI, this identifier (SI) is not recorded or stored in the systems.
Client Identifier (CI)	Client number used in a given agenda or group of agendas of one OVS, as a meaningless identifier known to both officials and clients	TIN, Insurance Number, Client Number	

Records of other natural persons

In the performance of public administration, a situation arises where the services provided do not concern a subject who is recorded in the basic population register. An example is the purchase of real estate by a foreigner who has no other relationship to the Czech Republic. Such a person is registered only with the administrator of the system administering legal relations to real estate (cadastre). This situation becomes a

serious problem when a person who is registered in only one system requests additional services in other systems, typically for the payment of taxes. Thus, in different systems, data is kept for the same person and it is not possible to share data using a reference interface, because it does not exist in the basic register. For this purpose, the so-called Register of Other Natural Persons was created to collect data on subjects who have interaction with the Czech public administration and then edit these data in the basic register of residents through the foreigners' information system. Any AIS administrator who registers a subject who is not in the basic register is obliged to:

1. Find out the maximum available information about the subject. At a minimum, the name, surname, date of birth, number and type of identification document.
2. Edit this information in the system of Registration of Other Natural Persons.
3. Ensure that the data is updated if the AIS administrator is informed of it

Legal entity identifiers

For legal entities that are created and registered within the Czech public administration, the situation is immeasurably simpler. The vast majority of legal persons are recorded in the Personality Register, which is not subject to such data protection measures, since, unlike the personal data of specific natural persons, most data on legal persons is public by nature.

Nevertheless, the use and exchange of corporate data must follow the right principles and use the right identifiers:

- The basic identifier of a legal entity is the identification number (IDN), this is also the primary identifier held within the Personnel Register, where it is created
- If the legal entity has multiple establishments, the primary identifier of the establishment is the establishment identification number (OIN), which is also maintained within the Personnel Register

When a legal entity contacts the public administration, it is not actually the legal entity that acts, but a specific natural person acting on its behalf. Even if several legal entities are merged, the natural person acts as a result. The latter must be authorised to do so.

The basic authorisations of specific natural persons to act are also recorded in the Person Register as a reference. In the relevant editorial information systems, such as public registry systems, specific authorisations for the representation of a legal person may be recorded. Within the linked data pool, the links registered in the Person Registry are always available. Other links may be published by a particular AIS, but the reader is always responsible for their interpretation.

Thus, since communication with a legal entity effectively involves communication with a specific natural person acting on its behalf, it is necessary that the relevant public authority follow the principles of Evidence of subjects in all its related activities.

Subject identifiers are used in official communication and interaction with the client, in the recording of data in the relevant information systems, and in the exchange of data with other information systems.

Evidence of other legal entities

Similarly to the case of registration of other natural persons, a situation arises in the performance of public administration when the services provided do not concern a subject that is recorded in the basic register of persons. In the framework of the development of the basic registers and thus of the whole PPDF, it is planned to extend the registration of other legal persons.

Any AIS administrator who registers an entity that is not in the basic register is obliged to:

1. Find out the maximum available information about the entity. At a minimum, however, the name, type of

incorporation and other registration details of the legal entity, including tax and other identifiers

2. Ensure that the data in its data pool is updated, if the AIS administrator is informed of it, and subsequently propagate the change to the records of other legal entities.

View identifiers in the VS

Entity Registration Rules

Principles for the use of individual identifiers

As an identifier of a natural person (and consequently of a legal person, since a natural person always acts for a legal person), different types of identifiers are used in different agencies, both for internal processes and services (inside the agency) and for data exchange (outside the agency). Subject identifiers are used for official communication and interaction with clients, for recording data in the relevant information systems and files, and for exchanging data with other information systems.

When registering subjects in the office's data trunk

The aim of PPDF and pseudonymisation is to establish a uniform form of identification of the subject in its registration. It is no longer possible to continue to use the persistent identifiers that have been abused up to now, but it is instead necessary to adapt quickly to the obligations of pseudonymisation. Therefore, the following basic principles for the registration of subjects must be respected:

1. The identifier for communication between the different agency information systems is always the AIFO (the AIFO is translated via the ISZR and ISSS services).
2. The AIFO is never displayed in the system and must not be accessed by the official.
3. The official/client identifier of an individual must not be the AIFO, but always the client number for a given agenda, assigned by the administrator of that agenda, which is used as the presented identifier in the AIS and for the official. This identifier must be meaningless, so no other personal data of the individual can be derived from it. The agenda assigning the client identifier must provide services for obtaining it based on the contact identifier or AIFO and vice versa. At the same time, it shall manage the authorisation to use such a service.
4. When interacting with a client (face-to-face meetings at the counter and processing of incoming documents and messages), liaison identifiers such as document type and number shall be used and a one-stop translation service to AIFO and the services of the issuer of the client identifier shall be used to obtain that identifier.
5. Liaison identifiers are not primarily recorded unless they are also the client number.
6. A person's AIFO may never be provided directly, always using the translation service from my AIFO to the AIFO of the recipient of the data exchange.
7. Unless there are specific reasons for doing so, only the AIFO is exchanged in the data exchange and no other identifiers or data are added.

The services for the translation of the current contact identifier must be provided with a critical availability level - this is the identification of the person. The issuer or administrator of the contact identifier must ensure the historical uniqueness of the identifier and the services providing the translation to AIFO also for the historical values of the identifier (for historical values the availability level required is the primary service).

When interacting with a client

The type and number of the document presented by the client, or otherwise verified contact identifier, shall be used when interacting with the client in person or in person.

- The client shall present a document with a specified identifier that is a contact identifier.
- A one-time identification service shall be called through the AIS by translating the contact identifier to the AIFO in his/her agenda.
- Furthermore, the official works in the AIS according to the AIFO of the subject (which he does not see on the screen), he does not keep the contact identifier any more. If there is a client identifier, he/she may retain that identifier during communication.
- When communicating with other AIS and other agencies, he/she will use the services of his/her AIS (where the AIS through ISSS will ensure the exchange of data after translation of the AIFO).

When processing forms, the following three situations and resulting procedures then occur:

1. Electronic form: the form must be created in such a way that the identity of the client is already transferred, and during its processing the AIS will perform a trace of the actual data according to the AIFO of the subjects.
2. Paper form: The paper form requires a combination of first name, last name, and document type and number, or other contact identifier. When the form is processed, the appropriate service is called again in the AIS to translate the liaison identifier to the AIFO once, thereby identifying the subject for that AIS. In this case, all data (including identifiers) are remembered because of the need to store the form itself.
3. Assisted filing: In assisted filing at the counter, the relevant staff member will make a present identification against the document and, if acting on behalf of the subject at the counter, will use the relevant services to do so. If he/she is then acting on behalf of the OVM, again when enrolled in the AIS, this AIS will call the one-time translation service of the liaison identifier to the AIFO.

Data records, AIFO, AIS, Data trunk, Subject area