

Privacy Policy – Use of AI-powered search: vifi

The protection of your personal data is of paramount importance to the City of Villach. Below, in accordance with Article 13 of the EU General Data Protection Regulation (GDPR), we provide you with comprehensive information about which data we process when you use our AI-powered search tool "Villacher info finder" (:vifi), the legal basis for this processing, where data is transferred, and your rights.

1. Responsible Authority

The entity responsible for processing your data is:

City of Villach

Rathausplatz 1

9500 Villach

2. Purpose of data processing and function of the service

To provide a modern chat function (vifi), the City of Villach uses the AI Concierge service from goodguys GmbH (Moeringgasse 20/1, Door 2, 1150 Vienna) as a data processor.

This is an artificial intelligence (AI) from Austria that—when you access our chat function by entering a search term in the search bar—finds answers to your questions from the content of our websites, along with publicly available information.

3. Scope of processed data

The following categories of data are processed when using the chat:

a. Technical connection data (metadata)

For technical purposes and to distinguish between concurrently active chat sessions, your IP address and a temporary session ID are processed. Additional metadata (timestamp, user agent, language, referrer URL) is also processed. This data is processed exclusively on servers of our data processor (goodguys GmbH) located within the EU or the EEA. It is automatically deleted at the end of your chat session and can no longer be associated with you.

b. Content of search queries (prompts)

To formulate and generate the answers, the text questions you enter are forwarded to the systems of our data processor (goodguys GmbH) and to the servers of the sub-processor OpenAI (see section 5.c). The assignment of answers to users is carried out exclusively by the IT systems of goodguys GmbH.

Neither the City of Villach nor goodguys GmbH transmits any technical identifiers (such as your IP address or session ID) to OpenAI.

However, if you enter personal data (e.g., your name, email address, phone number) into the chat window, this text will be transmitted to OpenAI unfiltered. If you do not wish this to happen, please ensure that you do not enter any personal information in the chat window.

c. Functional testing and further development

The data entered in the search query is stored by the data processor in a form that, after deletion of the IP address, session ID, and other metadata, no longer allows direct association with specific users. These logs serve for technical functionality monitoring, system security, and the continuous improvement of the search function.

4. Legal basis for data processing

The provision of our AI-powered search function serves to provide the public with up-to-date information and to optimize our digital citizen services. The legal basis for processing your data (metadata and any search queries you may have entered) is Article 6 Paragraph 1 Letter e GDPR (performance of a task carried out in the public interest) in conjunction with the tasks legally assigned to the City of Villach for providing information within the framework of municipal administration pursuant to Section 1 of the Villach Municipal Law 1998 – K-VStR 1998.

The use of this service is entirely voluntary. You are neither legally nor contractually obligated to use this search function or to provide data. Failure to provide data will have no negative consequences for you. Alternatively, you can also access all information via the classic (static) search function on our website.

5. Recipients of personal data

As part of the operation of the search function :vifi, your data will be shared with the following recipients:

a. AI concierge service provider (data processor)

goodguys GmbH (Moeringgasse 20/1, Door 2, 1150 Vienna)

This company is responsible for the technical provision of the AI Concierge.

b. Infrastructure service providers (sub-processors)

Wedel GmbH (Mittlerer Kirchberg 3, 7100 Neusiedl am See, Austria)

This company, as a contractually approved sub-processor, is responsible for providing data center and hosting services.

c. AI technology service providers (sub-processors)

OpenAI OpCo, LLC (1455 3rd Street, San Francisco, CA 94158, USA; hereinafter referred to as "OpenAI")

The textual content of your search queries (without your IP address, session ID or other metadata) is transmitted to this company in order to generate the automated response.

6. Data transfer to third countries

Since the AI technology service provider OpenAI operates in the USA, the text content of your requests (prompts) is transferred to servers in a third country. The legal basis for this international data transfer is appropriate safeguards pursuant to Art. 46 para. 2 lit. c GDPR. Our data processor (goodguys GmbH) has concluded a

legally binding data processing agreement with OpenAI, which includes the European Commission's Standard Contractual Clauses (Model 3 "Processor-to-Processor").

The system handles your data strictly according to the content of your input:

a. Entering a search query without personal information

By default, no personally identifiable information is transmitted to OpenAI when you initiate a search (metadata such as IP addresses and session IDs remain exclusively within the EU).

b. Entering a personal search query

Should you, contrary to our explicit security notice, enter personal data (such as your name, email address, telephone number, or specific personal information) into the search box, this text will be transmitted unfiltered to OpenAI in the USA due to system limitations, as automated filtering beforehand is technically impossible.

The standard contractual clauses we have concluded oblige OpenAI to maintain an appropriate level of data protection comparable to that of the EU and apply fully to this case as well.

We expressly point out that, despite the standard contractual clauses in place, a level of data protection completely equivalent to that of the EU cannot be guaranteed in the USA. There remains a residual legal risk that US security authorities (e.g., under the CLOUD Act) could gain access to the text you enter without the City of Villach or you having directly equivalent European legal remedies against this.

7. Storage duration

a. IP address and session ID

They are irrevocably deleted immediately upon ending the chat session (closing the browser window or chat tab).

b. Request content (prompts)

After the session, your technical connection data will remain decoupled from the data processor's (goodguys GmbH) system until a final, irreversible statistical anonymization of the text protocol has taken place.

8. Your rights as a data subject

Under the GDPR, you have the following rights vis-à-vis the data controller, provided the legal requirements are met:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to object to processing (Art. 21 GDPR)

Since technical identifiers (especially IP address and session ID) are deleted immediately after the end of the chat session, the City of Villach is unable to subsequently associate stored search queries with a specific person. Therefore, exercising the aforementioned rights (e.g., to information or deletion) requires you to provide us with additional information that allows us to clearly identify your specific request (e.g., the exact wording and the precise time of the request).

You also have the right to lodge a complaint with the competent supervisory authority if you believe that the processing of your personal data violates data protection law:

Austrian data protection authority

Barichgasse 40-42

1030 Wien

E-Mail: dsb@dsb.gv.at

9. Further information from goodguys GmbH

Further information about the AI Concierge and the data protection policy of goodguys GmbH can be found at the following link:

https://goodguys.ai/Datenschutzerklaerung_goodguys_202412.pdf

10. Contact us for further questions

For further questions regarding data protection, the data protection officers of the city of Villach will be happy to assist you:

City of Villach

Rathausplatz 1, 9500 Villach

T 04242-205-1100 | E datenschutz@villach.at

Privacy policy as of June 2026