

Spett.li Clienti

Subject: Cloud & Cybersecurity Voucher – Application pre-filling opens on 20 October 2026; formal submission opens on 10 November 2026.

The Italian Ministry of Enterprises and Made in Italy has defined the operating procedures for access to the “Cloud & Cybersecurity Voucher”, an incentive designed to support investments by micro, small and medium-sized enterprises and self-employed professionals in technological solutions for cloud computing and cybersecurity.

The incentive consists of a non-repayable grant awarded under the de minimis regime and is intended to support a genuine technological and security upgrade compared with the solutions already in use by the beneficiary.

1. Eligible beneficiaries

Eligible applicants are micro, small and medium-sized enterprises and self-employed professionals operating in Italy.

For enterprises, the eligibility requirements include compliance with the mandatory insurance requirements covering damage directly caused by natural disasters and catastrophic events. Self-employed professionals are required to hold an Italian VAT number and, where applicable to the activity carried out, to be registered with the relevant professional body.

As the aid is granted under the de minimis regime, compliance with the overall EUR 300,000 ceiling applicable under EU rules must also be verified, taking into account the “single undertaking” concept.

2. Internet connectivity requirement

A specific eligibility requirement is that, on the date the application is submitted, the applicant must have an internet connectivity contract providing a nominal or maximum download speed of at least 30 Mbps.



Studio Pisciotta

C.F. PSCNGL74H27G273R
P.I. 04848330827
pecstudiopisciotta@studiopisciotta.it
studiopisciotta@studiopisciotta.com

www.studiopisciotta.com

Sede di Marsala Via Sibilla, 5 - +39 0923 952388
Sede di Palermo Via Stefano Turr, 38 - +39 091 6090036
Sede di Roma Via C. Colombo, 456 - +39 06 5817225
Sede di Reggio Calabria Via Sant'Anna, 4 - +39 0965 24582

It is therefore advisable to check the technical specifications of the connectivity contract currently in place before submitting the application.

3. Amount of the incentive

The non-repayable grant is available for up to 50% of eligible expenditure, subject to a maximum grant of EUR 20,000 per beneficiary.

The investment plan must have a minimum value of EUR 4,000.

For example, eligible expenditure of EUR 20,000 may generate a maximum grant of EUR 10,000, whereas obtaining the maximum grant of EUR 20,000 requires eligible expenditure of at least EUR 40,000.

The total budget for the measure is EUR 150 million, of which more than EUR 71 million is reserved for the regions of Southern Italy.

4. Eligible investments

Only solutions that are new and additional, or more advanced and secure than those already used by the beneficiary, are eligible.

The main eligible expenditure categories are:

- cybersecurity hardware, such as firewalls, next-generation firewalls (NGFW), secure routers and switches, and intrusion detection/prevention systems (IDS/IPS);
- cybersecurity software, such as antivirus and anti-malware solutions, network monitoring software, data encryption solutions, security information and event management (SIEM) systems, and vulnerability management software;
- IaaS and PaaS cloud services, including virtual machines, storage, backup, VPN connectivity, DDoS services and databases;
- SaaS cloud services, including accounting software, human resources management solutions, ERP and workflow/productivity systems, including solutions featuring artificial intelligence, CMS, e-commerce tools, CRM systems, virtual switchboards and business intelligence tools;



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- configuration, monitoring and ongoing support services, provided that they are connected with one or more of the other eligible categories and do not exceed 30% of the total expenditure plan. General-purpose hardware without a specific cybersecurity function is not eligible. Likewise, simple extensions of existing licences, increases in the number of licensed users or workstations, and upgrades that do not result in a substantial improvement over the solution already in use are excluded.

5. Purchases must be made from qualified suppliers

A particularly important requirement is that subsidised products and services must be purchased from qualified suppliers in accordance with the procedures established by the Ministry of Enterprises and Made in Italy and the Italian National Cybersecurity Agency.

The list of qualified suppliers was established by decree dated 29 July 2026 and is available through the Invitalia platform.

Before making any investment, applicants should therefore verify that both the chosen supplier and the proposed products or services are duly qualified for the purposes of the incentive.

6. Direct purchase or subscription

Eligible solutions may be purchased outright, acquired through a subscription, or through a combination of the two methods.

In the case of a direct purchase, the expenditure plan must be completed within 12 months from the date on which the grant award decision is notified.

In the case of a subscription, the term may not be shorter than 24 months. The contract must be signed within 30 days of the grant award decision, and its execution must be notified through the online procedure within the following 60 days. If the subscription lasts longer than 24 months, only the fees relating to the first 24 months are eligible.

7. Application procedure: chronological order is important



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The measure operates through a first-come, first-served procedure, and applications are assessed according to the chronological order in which they are formally submitted. Each applicant may submit only one application.

Phase 1 – Pre-filling: from 12:00 noon on 20 October 2026, applicants may prepare their application. The applicant or its authorised representative must access the online procedure using SPID, CIE or CNS, enter the required information, upload the supporting documents, provide an active certified email address (PEC), generate the application form and digitally sign it. At the end of this phase, an “application preparation code” will be issued.

Phase 2 – Formal submission: from 12:00 noon on 10 November 2026 until 12:00 noon on 20 January 2027, the application may be formally submitted using the preparation code obtained in Phase 1.

Upon submission, a CUP – Unique Project Code – is issued. This code must be shown on all supporting expenditure documents relating to the subsidised investment.

8. Documentation to be prepared

The application must state, among other information, the selected products and services, the relevant qualified suppliers, the total amount of the expenditure plan, the requested grant, the duration of the investment and the applicant’s existing technological setup.

It is particularly important that supplier quotations clearly demonstrate the actual technological improvement compared with the solutions already in use or, in the case of a new service, confirm that the service was not already available to the applicant.

9. Payment of the grant

The grant may be requested in a single payment after completion of the investment, or in two instalments.

A payment request may be submitted no earlier than three months after notification of the grant award. The first instalment, equal to 50% of the grant, may be requested once at least 50% of the approved



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expenditure plan has been incurred. The balance is paid after completion of the investment and submission of the full supporting documentation.

10. Why it is advisable to prepare the application in advance

Since this is a first-come, first-served procedure in which the chronological order of submission is relevant, potentially eligible applicants are advised to verify in advance their eligibility, compliance with the de minimis rules, the internet connectivity requirement, any applicable natural-disaster insurance obligation, the qualification of the supplier and the eligibility of the planned investments. The Ministry may close the application window early if the available funds are exhausted.

Our Firm is available to assist

Our Firm is available to assist interested Clients with a preliminary review of the eligibility requirements, the investment plan and the documentation prepared by suppliers, as well as with the preparation and submission of the application.

Kind regards.

5 ottobre 2026

Avv. Dott. Angelo Pisciotta



Studio Pisciotta

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