

REGULATIONS ON INTERBANK DATA TRANSMISSION BETWEEN SAN MARINO AND ITALY

year 2009 / number 03

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GENERAL PART

Article 1 – Definitions

- 1. For the purposes of these Regulations, the following definitions shall apply:
 - a) "Data Bank" or "DBBCSM": data bank constituted, managed and maintained by means of an IT system by the Central Bank, fed with the identification data of the clients of transferee banks;
 - b) "Central Bank" or "CBSM": the Central Bank of the Republic of San Marino;
 - c) "transferor banks"; Italian banks, affiliated with the Central Bank, that provide payment services on a contractual basis to transferee banks and their clients;
 - d) "transferee banks": San Marino banks that use the Italian payment system for providing payment services to their clients;
 - e) "client": any party, natural person, entity (including trusts and foundations), company, including fiduciary and/or anonymous companies, as governed by the Law of the country where it was set up, that establishes ongoing relationships or carries out transactions with transferee banks;
 - f) "identification data":
 - for natural persons: name, surname, date and place of birth, residence address, tax code (if residing in Italy), ISS code (if residing in San Marino), passport number (if residing in third countries other than Italy and San Marino);
 - for legal persons: name, address of the registered office, VAT number (if the registered office is established in Italy), Authorised Economic Operator Code (if the registered office is established in San Marino), identification code adopted in the foreign country (if the registered office is established in third countries other than Italy and San Marino);
 - g) "Decree": Decree-Law no. 65 of 14 May 2009, called "Central Bank's Mediation for the purpose of interbank data transfer between San Marino and Italy";
 - h) "identification document": any document that contains a photograph and indication of all the personal details of a natural person, issued by an Italian or San Marino public authority; the personal details of a person are name, surname, date and place of birth and address of residence. For non-residents in Italy or in the Republic of San Marino, the identification document consists exclusively of a passport;
 - i) "master record flow": record containing the identification data of clients, their beneficial owners, if there are any and these do not coincide with clients, as well as any delegated parties and/or mere bearers;
 - j) "asymmetrical flow": record containing data and information specified in the attached fact sheet that the transferee bank sends to the transferor bank and the Central Bank;
 - k) "business day": banking business day according to the national Italian calendar and not a holiday in San Marino;
 - l) "mere bearer" or "presenter": natural person who presents to the transferee bank adhering to an operational provision applicable to an ongoing relationship, which had previously been signed and authorised by the relationship nominee or a delegate of the latter. Professional carriers, i.e. parties conducting collection, transport and delivery activities on behalf of third parties in their capacity as businesses, are excluded from the definition;

- m) "Italian legislation on money laundering and anti-terrorism": respectively, Legislative Decree no. 231 of 21 November 2007 and Legislative Decree no. 109 of 22 June 2007, including their implementing measures;
- n) "payment transaction": any arrangement for the transfer of sums, financial resources and/or other values, also incorporated into registered or bearer debt securities, of an amount equal to or greater than 5,000 Euro (five thousand Euro). At any rate, cash transfers are excluded as they are not subject to mediation for the purpose of collection;
- o) "Rete Interbancaria Sammarinese (San Marinese Interbank Network or RIS)": electronic transmission infrastructure for the transmission of information between operators of the San Marino payment system";
- p) "payment services": the processing and regulations on the Italian payment system of payment transactions by wire transfers, cheques, direct debits or commercial redemptions, as well as issue services for bankers' drafts and payment cards;
- q) "delegated party": the party vested by the owner of the relationship with the power, according to the banking rules in force, to perform sales deed/dispositions pursuant to the relationship;
- r) "stakeholders": parties whose identification data can be recorded in the Data Bank held by the Central Bank. This definition covers clients, beneficial owners, delegate parties and mere bearers;
- s) "client due diligence monitoring": monitoring carried out pursuant to Article 18 and, if the prerequisites apply, Article 28 of Italian Legislative Decree no. 231 of 21 November 2007.
- 2. In subsequent articles, the words that refer to these definitions are given in a small caps font.

Article 2 - Purposes

1. These regulations, issued pursuant to Article 3, paragraph 3 of the DECREE, aims to govern the procedures for the correct data input in the DATA BANK, WHICH IS managed by the CENTRAL BANK, by the TRANSFEREE BANKS.

Art. 3 – Information Recipient Parties

1. IDENTIFICATION DATA in the DATA BANK will be transmitted by the CENTRAL BANK exclusively to the TRANSFEREE BANKS that have specific agreements with the CENTRAL BANK and offer PAYMENT SERVICES to the TRANSFEREE BANKS and/or their clients, in order to allow the former to fulfil the requirements provided for by ITALIAN LAW ON ANTI-MONEY LAUNDERING AND ANTI TERRORISM.

Article 4 – Organisational profiles

- 1. The adoption of all necessary organisational controls aimed to ensure the completeness, correctness and timeliness of the ASYMMETRICAL and master record data flows SENT to THE CENTRAL BANK and, only as relates to ASYMMETRICAL FLOWS, to TRANSFEROR BANKS, IS UNDER THE RESPONSIBILITY OF THE COMPETENT CORPORATE BODIES.
- 2. The significant operational risks inherent in the activities of a recording, extracting, verifying, and forwarding identification data of STAKEHOLDERS require the timely detection by the risk management structure referred to in Article VII.IX.8 of Regulation no. 2007-07, of possible anomalies and/or malfunctions that can affect the timely

compliance with both the provisions referred to in the DECREE and these Regulations and the contractual obligations entered into with the TRANSFEROR BANKS.

- 3. Strict compliance with the provisions contained in the DECREE and in these Regulations, is subject to monitoring by the compliance structure referred to in Article VII.IX.7 of Regulation no. 2007-07, of TRANSFEREE BANKS.
- 4. The Internal Auditing structure referred to in article VII.IX.6 of Regulation no. 2007-07, is required to ensure the overall reliability of the internal procedures for the execution of the activities mentioned in the second paragraph, the adequacy of the information technology systems used and the completeness of first- and second-level controls. The outcomes of the controls are notified quarterly to the CENTRAL BANK, by the end of the month following each calendar quarter. The following must be listed in the quarterly report:
 - a) the method used for auditing controls on the process for the input and transmission of relevant data for the Data Bank pursuant to Decree Law no. 65 of 14.5.2009, specifying the metrics for assessment (articulated across at least three assessment levels) and any attention indicators used (1);
 - b) summarised references on the procedures for selecting the sample of operations/processes subjected to quarterly auditing;
 - c) hours/man allocated for these checks over the quarter;
 - d) actual transactions analysed;
 - e) the results of the checks, with a summarised opinion for each of the analysed profiles (2);
 - f) any initiatives proposed for the removal of the deficiencies found;
 - g) follow-ups from previous audit work that ended with an assessment of non full adequacy.

- completeness of the master record data in the flows to be forwarded and their consistency with those entered in the company data banks;
- consistency of data with the provisions of Regulation no. 2009-03;
- procedures for the input of asymmetrical and master record flows;
- first- and second-level controls on the correctness of the data in asymmetric and master record flows forwarded to the CENTRAL BANK and the TRANSFEROR BANK;
- handling of pending flows;
- error handling and consequent filing procedures;
- presence of areas of manual entry in flow input;
- compliance with the contractual obligations towards the TRANSFEROR BANK;
- verification of proper allocation, update, and accounting of guarantees granted to the TRANSFEROR BANK;
- verification of the completeness and up-to-date status of data on clients and beneficial owners, especially in the
 presence of parties including foreign parties of the type such as fiduciary companies, trustees, anonymous
 companies;
- compliance with deadlines for the submission of flows;
- failure to use the TRANSFEROR BANK to carry out payment transactions in Euro to and from Italy.

¹ In the description of the methods for analysis, disclosure is required of the procedures for conducting the audit activity carried out in accordance with CBSM Regulation no. 2009-03, specifying the organisational units involved, operational processes examined and the different types of risks considered. In this context, it is necessary to describe the criteria adopted to evaluate the efficiency and compliance of the operational processes with the requirements both of the regulatory source of reference for Data Banks (see Decree Law no. 65 of 14 May 2009 and CBSM Regulation no. 2009-03) and contractual agreements. In relation to the findings of the analysis, assessments must be articulated over three or more levels by using qualitative and quantitative ratings (for example, evaluations such as "adequate", "sufficient", "inadequate"). In view of the mass nature of the operations for the extraction, reprocessing and input of information flows, it is necessary to define a set of indicators aimed to detect, on one hand, recorded anomalies (for instance, discarded flows, requests from adjustments issued by CBSM or the TRANSFEROR BANK) and, on the other, potentially "critical" situations (for instance, transactions of large amounts or arranged for trusts, fiduciary companies or foreign anonymous companies) that require focused attention.

² Purely by way of example and not of limitation, the following profiles are considered:

Article – 5 Certification requirements

1. TRANSFEREE BANKS must transmit, no later than the 15th day of each month, to the Supervisory Reporting and Methodologies Service of the CENTRAL BANK a certification of compliance – signed by the head of the executive structure— of the data contained in THE ASYMMETRICAL AND master record FLOWS transmitted during the previous month with the evidence held by the reporting bank.

Art. 6 - Information to the parties concerned

- 1. In order to ensure appropriate information to STAKEHOLDERS concerning the processing of IDENTIFICATION DATA entered in the DATA BANK and sent to the TRANSFEROR BANKS, TRANSFEREE BANKS are obliged to affix the contents of Annex A in all their premises open to the public.
- 2. Similar information will be delivered in the context of periodic communications sent by the TRANSFEREE BANKS to their clients pursuant to Article X.IV.15 and subsequent articles of the CENTRAL BANK 2007-07 Regulations.

Art. 7 – Operational aspects and economic terms

- 1. The operational aspects and economic terms of the DATA BANK are set forth by the CENTRAL BANK and reported in the specific "Technical Fact Sheet".
- 2. TRANSFEREE BANKS are required, pursuant to article 6 of the DECREE, to contribute to covering the direct costs incurred by the CENTRAL BANK for providing management services for the DATA BANK, as indicated in the "Technical Fact Sheet".
- 3 Changes made to the "Technical Fact Sheet" are subject to specific notification to TRANSFEREE BANKS and publication on the website of the CENTRAL BANK, and have effect after ten calendar days from the date of the relevant notification, to be carried out by means of registered letter with advice of receipt.

Article 8 – Integrations

- 1. For all matters not governed by these Regulations, reference should be made to the DECREE.
- 2. Annexes A (Information to be provided to clients) and B (Technical Fact Sheet) form an integral part of these Regulations.

Article 9 – Period of validity

1. Pursuant to Articles 4 and 8 of the DECREE, these Regulations shall enter into force on 20 May 2009 and, except for the obligations to store the IDENTIFICATION DATA held in the DATA BANK for ten years, shall cease to have effect by the unanimous decision of the Committee for Credit and Savings.

ANNEX A: Information to be provided to clients

Information to be provided to clients on behalf of bank XXX (insert the name of the TRANSFEROR BANK) pursuant to article 13 of Italian Legislative Decree no. 196/2003

Bank XXX (insert the name of the TRANSFEROR BANK) with headquarters in xxx (insert registered office's address, post code and city), as Data Controller, informs you on the use of your personal data.

The data (communicated by the Bank of which you and a client) will be processed for the following **purposes**:

- 1. fulfilling obligations required by law, by regulations, by the EC rules as well as the instructions issued by Authorities with legal mandate or by competent supervisory or control bodies (for example obligations under anti-money laundering legislation) for which consent is not necessary;
- 2. complying with obligations under the contracts that you entered or fulfilling, before closure of the contract, your specific requests, (in this case, your consent is not necessary since data processing is connected with the management of the relationship or the implementation of the requests).

The processing of your data takes place by means of manual and automated instruments through **procedures** that are closely related to the above-mentioned purposes (also by means of profiling related to client risk or through data comparison), protected by appropriate safety measures.

Within XXX (insert the name of the TRANSFEROR BANK), employees, staff in any capacity (e.g.: seconded staff, interns, temporary staff) and external collaborators involved in services to clients, may become **aware** of your personal data, as managers or staff in charge of their processing.

In order to fulfil the above-mentioned purposes, XXX (insert the name of the TRANSFEROR BANK) it can **communicate** your data to certain parties, including foreign parties, belonging to given categories (in addition to those identified by law) to carry out the related processing whose references are reported in an updated list available from the Data Processing manager.

XXX (insert the name of the TRANSFEROR BANK) shall not disclose your personal data.

In order to carry out international financial transactions (e.g., a wire transfer sent abroad), and transactions at the national level (e.g., wire transfers in a foreign currency and/or with non-resident counterparty), required by clients, it is necessary to use:

- 1) **RNI** (National Interbank Network), namely the electronic transport infrastructure that connects the Bank of Italy, banks, Ente Poste, consortia, Application Centres, SIMs (brokerage firms), and operators in national markets in Italy.
 - **RNI** ensures the transport of interbank dispositional and information flows guaranteeing reliability of execution, safety of action and confidentiality of data.
- 2) **S.W.I.F.T.** (Society for Worldwide Interbank Financial Telecommunication), with registered office in Belgium (www.swift.com for information on data protection), the company that manages a international messaging service
 - The Bank shall communicate to SWIFT (controller of the SWIFT system Net Fin) data referring to parties who carry out the transactions (such as e.g. the names of the ordering party, of the beneficiary and their respective banks, bank details, amount and, if indicated, the reason for the payment), which are required to carry them out.

At present, banks would not be able not carry out the above transactions required by clients without using this interbank network and without the above-mentioned data notifying to it.

To supplement the information already provided, the Bank wishes to provide information on two circumstances that emerged:

- all the data of clients used to carry out the aforementioned financial transactions, are currently –for reasons of operational safety duplicated, transmitted and stored temporarily as a copy by SWIFT on a company server located in the United States of America;
- the data stored on this server are usable in the USA in accordance with local regulations. Competent US authorities (in particular the Treasury Department) have had access to them and may have further access to them on the basis of measures deemed as adoptable under US counter-terrorism legislation. The topic is widely debated in Europe at various institutions in relation to the provisions of European legislation concerning data protection.

ANNEX B: Fact Sheet

Fact Sheet

Update V: 6 June 2014

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1 Costs

The pro-rata contribution of transferee banks to the direct costs incurred by the Central Bank for the establishment and management of the Data Bank, it is articulated as follows:

- a fixed annual fee of € 5,000.00 determined both for the costs for adjustment of the application and the cost of the employees responsible for the management and control of the Data Bank;
- a variable fee, depending on the number of submitted files and the traffic generated on RIS, equal to:
 - o € 0.10 per file;
 - o € 0.006 for each KB of traffic delivered.

2 Contents of document

This document constitutes the fact sheet that describes the technical procedures for data input in the Data Bank, hereinafter called DBBCSM, established at the Central Bank of the Republic of San Marino (CBSM) that stores the identification data received from Transferee Banks.

In order to avail of all the master record information necessary for the Transferor Banks and to perform the required controls, Transferee Banks must send to CBSM two types of physical flows:

- the Master Record flow containing the required identification data;
- the Asymmetrical flow containing the required data relating to transactions carried out.

Below are indications of a technical nature regarding:

- procedures for the exchange of data between Transferee Banks and CBSM;
- record layouts used;
- controls performed on data transmitted;
- error handling.

3 Procedures for data exchange between Transferee Bank and CBSM

3.1 Description of data exchange procedures

The method for exchanging data between the Transferee Banks and CBSM is by file transfer:

- Transferee Banks prepare physical flows (files) containing data to be forwarded to CBSM;
- If errors are detected on received identification data, CBSM prepares the physical flows (files) containing information about the errors detected, to be forwarded to Transferee Banks.

The physical means used for the exchange of flows is the File Transfer application family of the San Marino Interbank Network (RIS), details of which can be found in the RIS official documentation. Transmitted Master Record and Asymmetrical physical flows shall comply with the following formatting requirements for file names:

Description	Position from – to	Value
Application Family	1 – 2	FT = File Transfer
Sender Bank	3 – 7	ABI (Italian Banking Association) code of Sender Bank of physical flow
Receiving Bank	8 – 12	ABI code of Bank receiving physical flow
Date (MMDD)	13 – 16	Application Date of submission of physical flow
Progressive	17 – 18	Unique suffix in application day
Description	19 – 100	Physical flow description

The "Description" field shall be indicated as described below:

- "AN-DBBCSM", in the case of Master Record physical flow sent by a Transferee Bank;
- "AS-DBBCSM", in the case of Asymmetrical physical flow sent by a Transferee Bank;
- "EA-DBBCSM", in the case of hesitation physical flow of Master Record flow sent by CBSM;
- "ES-DBBCSM", in the case of hesitation physical flow of Asymmetrical flow sent to CBSM;
- "EC-DBBCSM", in the case of physical flow for completeness error reporting sent by CBSM.

The RIS Technical Manager carries out the assessments provided for by the technical documentation of the File Transfer application family on the physical flows sent. The formal assessments and completeness controls on the content of the physical flow are performed by CBSM.

3.2 Frequency of data exchange

The data exchange between Transferee Banks and CBSM and between CBSM and Transferor Banks requires a frequency determined on the basis of the definition of business days.

The frequency entails the following:

- **T**₁ is the business day in which the Asymmetrical physical flow is transmitted by the Transferee Bank to the Transferor Bank and to CBSM;
- by 14.00 of **T**₁, the Transferee Bank must forward to CBSM the Asymmetrical physical flow and related Master Record physical flow;
- By 17.00 of **T**₁, the Transferee Bank must forward to CBSM the Master Record and Asymmetrical physical flows relating to business day **T**₁ reported by CBSM as incorrect.

Example of frequency for data exchange					
T_1 1st Cut-Off T_1 2nd Cut-Off T_1					
05/05/2009	05/05/2009 14.00	05/05/2009 17.00			
I	1	I			
V	V	V			

The deadline for sending the asymmetrical flow and the master record flow to the Central Bank is equal to two business days in the case of transactions arranged by Transferee Banks and five business days in the case of transactions arranged by Italy and destined for San Marino.

Therefore, the above term T1 corresponds – in the case of transactions from San Marino to Italy – to the second business day following the day of the payment transaction settled with the intervention of the Transferor Bank on the Italian or European payment system.

4 Control process of identification data

4.1 Premise

CBSM feeds the DBBCSM Data Bank with the identification data contained in the physical flows, which Transferee Banks have the obligation and responsibility to send to CBSM through RIS.

Prior to uploading received data into the Data Bank, CBSM performs a series of controls on them in order to verify the completeness of the master record information contained in the Master Record flows and their consistency with the information on the transactions contained in the Asymmetrical flows.

Below is a description of the control process, reference layouts and coding of any detected errors.

4.2 Validation

The first control phase is the validation of the Master Record and Asymmetrical physical flows (files), whose purpose is to detect the possible:

- lack of detailed records;
- presence of record types that are not allowed;
- presence of record sequence errors.

Each Master Record and Asymmetrical physical flow must have:

- only one head record and one tail record, otherwise a sequence error is detected;
- at least one detailed master or asymmetric record, otherwise a 'no detailed record' error is detected;
- consecutive records, one after another, otherwise a sequence error is detected.

The record types allowed are:

- 00 = head record;
- 99 = tail record:
- 20 = master data record:

In the case of different record types, the 'record type is not allowed' error is reported.

Occurrence of any of the above-mentioned errors will cause the rejection of the entire physical flow and the appropriate reporting to the sender Transferee Bank:

■ in the c	ase of lack of detailed records, the error code is:	(E01)
in the o	ase of lack of a sequence, the error code is:	(E02)
in the c	ase of record type not allowed, the error code is:	(E19)

4.3 Formal control of Master Data flow

The third control phase involves verification from the formal point of view of the Master Record physical flow. The following are the record layouts used; for each required field, controls conducted and error codes are also listed. Layouts indicate for each field:

- if mandatory or optional as regards controls carried out by CBSM;
- identification code;
- description:
- format:
- position;
- length.

Error code

Head Master Record

Detection of any of the errors described below will cause rejection of the physical flow and appropriate reporting by CBSM to the sender Transferee Bank.

M/O	Code	DESCRIPTION	FORMAT*	PC	SIT	ION	LENGTH
IVI/O	Code	DESCRIPTION	IONWAI	fro	om	to	LLNGIII
M	A00	RECORD TYPE	2n	1	-	2	2
M	A26	FILE TYPE	8x	3	-	10	8
М	A27	REFERENCE DATE (YYMMDD)	6n	11	-	16	6
М	A28	PROGRESSIVE DATE	4n	17	-	20	4
М	A01	SENDER ABI	5n	21	-	25	5
M	A29	RECEIVER ABI	5n	26	-	30	5
М	A30	BUSINESS DATE (YYMMDD)	6n	31	-	36	6
/	A31	BRIEF DESCRIPTION	15x	37	-	51	15
М	A32	TRANSMISSION TYPE	1n	52	-	52	1
/	A33	PREPARATION DATE (YYMMDD)	6n	53	-	58	6
/	A34	PREPARATION TIME (HHSS)	4n	59	-	62	4
		FILLER		63	-	400	338

^{*}Appendix A: description of conventions

Error code

A00 - RECORD TYPE

Record type indicated by "0"

Mandatory (E03)

A01 - SENDER ABI

ABI code of sender bank of physical flow.

Mandatory (E03)

It must coincide with the physical sender as defined in the file name (E04)

A26 - FILE TYPE

Definition of transmitted file type.

Mandatory (E03)

■ It must be indicated by "FTSMBCSM" (E15)

A27 - REFERENCE DATE

Date in YYMMDD format on which the physical flow is produced.

Mandatory (E03)

A28 - PROGRESSIVE DATE

Progressive physical flow in the Reference Date (code A27).

Mandatory (E03)

It must be unique in the Reference Date (code A27)

A29 - RECEIVER ABI

ABI code of bank receiving physical flow.

Mandatory (E03)

■ It must be indicated by CBSM ABI code = " 03225" (E20)

A30 - BUSINESS DATE

Date on which the related Asymmetrical physical flow in YYMMDD format is transmitted to the Transferor Bank and CBSM.

Mandatory (E03)

A31 – BRIEF DESCRIPTION

Brief description of physical flow.

Optional.

A32 - TRANSMISSION TYPE

Code identifying transmission type.

Mandatory (E03)

It must be indicated by " 0"
(E17)

A33 - PREPARATION DATE

A34 - PREPARATION TIME

Tail Master Record

Detection of any of the errors described below will cause rejection of the physical flow and appropriate reporting by CBSM to the sender Transferee Bank.

M/O	Code	DESCRIPTION	FORMAT*			ION	LENGTH
				tro	om	to	
M	A00	RECORD TYPE	2n	1	-	2	2
M	A26	FILE TYPE	8x	3	-	10	8
M	A27	REFERENCE DATE (YYMMDD)	6n	11	-	16	6
M	A28	PROGRESSIVE DATE	4n	17	-	20	4
M	A01	SENDER ABI	5n	21	-	25	5
M	A29	RECEIVER ABI	5n	26	-	30	5
M	A30	BUSINESS DATE (YYMMDD)	6n	31	-	36	6
0	A31	BRIEF DESCRIPTION	15x	37	-	51	15
0	A32	TRANSMISSION TYPE	1n	52	-	52	1
M	A35	NUMBER OF RECORDS SENT	6n	53	-	58	6
0	A36	AMOUNT - 1	15n	59	-	73	15
0	A37	AMOUNT - 2	15n	74	-	88	15
		FILLER		89	-	400	312

^{*}Appendix A: description of conventions

Error code

A00 - RECORD TYPE

Record type indicated by "99"

Mandatory (E03)

A01 - SENDER ABI

ABI code of sender bank of physical flow.

Mandatory (E03)

It must coincide with the matching field of the head record

(E04)

A26 - FILE TYPE

Definition of transmitted file type.

•	Mandatory	(E03)
•	It must be indicated by "FTSMBCSM"	(E15)

A27 – REFERENCE DATE

Date in YYMMDD format on which the physical flow is produced.

•	Mandatory	(E03)
•	It must coincide with the Reference Date as defined in the tail record	(E22)

A28 – PROGRESSIVE DATE

Progressive flow in the Reference Date (code A27).

-	Mandatory	(E03)
•	It must coincide with the date as defined in the head record	(E16)

A29 - RECEIVER ABI

ABI code of bank receiving physical flow.

•	Mandatory	(E03)
•	It must coincide with the corresponding field of the head record	(E20)

A30 - BUSINESS DATE

Date on which the related Asymmetrical physical flow in YYMMDD format is transmitted to the Transferor Bank and CBSM.

•	Mandatory	(E03)
•	It must coincide with the matching field of the head record	(E23)

A31 – BRIEF DESCRIPTION

Brief description of physical flow.

Optional.

A32 - TRANSMISSION TYPE

Code identifying transmission type.

•	Mandatory	(E03)
•	It must be indicated by " 0"	(E17)

A35 - RECORD NUMBER SENT

Number of records sent in the physical flow.

Mandatory (E03)

It must be equal to the number of records in the physical flow including the head and tail record (E18)

A36 - AMOUNT - 1

A37 - AMOUNT - 2

Master Record

The detection of any of the errors described below will lead to the rejection of the individual record and the appropriate reporting by the CBSM to the sender Transferee Bank. Correct Master Data records are stored in the DBBCSM Data Bank.

M/O	Code	DESCRIPTION	FORMAT*	POSITION			LENGTH
IVI/O	Code	DESCRIPTION	IONWAI	from to			LLINGTH
M	A00	RECORD TYPE	2n	1	-	2	2
M	A03	TRANSACTION KEY	40x	3	-	42	40
M	A04	MASTER RECORD KEY	20x	43	-	62	20
M	A05	MASTER RECORD TYPE	2n	63	-	64	2
M	A06	SUBJECT TYPE	2n	65	-	66	2
M	A07	SURNAME NAME/BUSINESS NAME	70x	67	-	136	70
M	A08	COUNTRY OF RESIDENCE	3x	137	-	139	3
M	A09	MUNICIPALITY OF RESIDENCE	30x	140	-	169	30
M	A10	PROVINCE OF RESIDENCE	2X	170	-	171	2
М	A11	RESIDENCE ADDRESS	35x	172	-	206	35
M	A12	POST CODE OF RESIDENCE	5x	207	-	211	5
М	A13	IDENTIFICATION CODE TYPE	2n	212	-	213	2
М	A14	IDENTIFICATION CODE	20x	214	-	233	20
M/O	A15	DATE OF BIRTH N.P. (YYYY-MM-DD)	10x	234	-	243	10
M/O	A16	PLACE OF BIRTH N.P.	30x	244	-	273	30
M/O	A17	DOCUMENT TYPE	2n	274	-	275	2
M/O	A18	DOCUMENT NUMBER	15x	276	-	290	15
M/O	A19	ISSUE DATE OF DOCUMENT (YYYY-MM-DD)	10x	291	-	300	10
M/O	A20	PLACE OF ISSUE	30x	301	-	330	30
М	A21	TRANSFEROR ABI	5n	331	-	335	5
0	A24	TRANSMISSION OUTCOME	1n	336		336	1
0	A25	BANK INFORMATION / BANK	30x	337	-	366	30
		FILLER		367	-	400	34

^{*}Appendix A: description of conventions

A00 - RECORD TYPE

Record Type indicated by " 20"

Mandatory (E03)

A03 - TRANSACTION KEY

Unique key identifying the transaction.

Mandatory and structured in accordance with the provisions of Appendix H

A04 - MASTER RECORD KEY

Unique key identifying the master record subject.

Mandatory (E03)

It must coincide with the value in Identification Code field (code A14)
 (E24)

A05 – MASTER RECORD TYPE

Code identifying the subject's master record type.

Mandatory (E03)

It must belong to the following set of values:

01 = Client / Relationship nominee

02 = Beneficial owner

03 = Presenter (E06)

Error code

A06 - SUBJECT TYPE

Code identifying the nature of the master record subject.

Mandatory (E03)

It must belong to the following set of values:

01 = Natural Person

02 = Legal Person (E07)

A07 - LAST NAME / COMPANY NAME

First name surname or company name of the data subject.

Mandatory (E03)

In the case of A06 - subject Type = 01 (natural person), a " +" character separating Surname from Name must be present in the string of characters (E28)

A08 - COUNTRY OF RESIDENCE

UIC Code of the country of residence of the master record subject.

Mandatory (E03)

It must be among the values provided for by UIC coding
 (E08)

Based on the value of the field A13 – Identification Code Type, it must take the following values:

A13 - Identification Code Type	A08 - Country of Residence
01 – Tax Code	086 - Italy
02 – ISS Code	037 – San Marino
03 – Passport	UIC code other than 086 and 037
06 – Vat Registration No.	086 - Italy
07 – COE (Economic Operator Code)	037 – San Marino
Code	
08 – Foreign country identification code	UIC code other than 086 and 037

A09 - MUNICIPALITY OF RESIDENCE

Municipality of residence of the data subject.

Mandatory (E03)

A10 - PROVINCE OF RESIDENCE

Two-letter code of province of residence of data subject.

Mandatory (E03)

 Based on the value of the field A08 Country of Residence, it must be among the values provided for by Appendix F

(E26)

A11 - HOME ADDRESS

Residence address of data subject.

Mandatory (E03)

A12 - HOME ADDRESS POSTAL CODE

Post Code of residence of the master record subject.

Mandatory (E03)

A13 – IDENTIFICATION CODE TYPE

Code identifying the type of identification code of the master record subject.

Mandatory (E03)

It must belong to the following set of values:

for A06 - Subject type = 01 (natural person)

01 = Tax code (if Italian resident)

02 = ISS code (if San Marino resident)

03 = Passport (if residing abroad) or, for persons residing in European countries other than Italy, included in the White List recognised by the Italian legislation on money laundering, and not in possession of a passport, identity card issued in the European country of residence (hereinafter, "European identity card")

for A06 - Subject type = 02 (legal person)

06 = Vat Registration No.

07 = COE

08 = Identification code of foreign country of residence

(E09)

A14 – IDENTIFICATION CODE

Code that uniquely identifies the master record subject.

Mandatory (E03)

It coincides with the value in the Master Record Key field (code A04)
(E24)

■ The representation convention must respect the required controls (see Appendix D – Conventions and controls of Master Record Key and Identification Code) (E29)

A15 - DATE OF BIRTH N.P.

Date of birth of the master record subject of the natural-person type in the YYYY-MM-DD format.

Optional

In the case of A06 - Subject type = 01 (natural person) is required

A16 - MUNICIPALITY OF BIRTH L.P.

Place of birth of master record subject of natural person type.

Optional

■ In the case of A06 - Subject type = 01 (natural person) is required (E03)

A17 – DOCUMENT TYPE

Identification document type of master record subject of natural person type.

Optional

In the case of A06 - Subject type = 01 (natural person) is required

(E03)

(E03)

• In the case of A06 - Subject type = 01 (natural person) must belong to the following set of values:

01 = Identity card

02 = Passport or European identity card

03 = Driving license

(E10)

A18 – DOCUMENT NUMBER

Identification document number of master record subject of natural person type.

Optional

In the case of A06 - Subject type = 01 (natural person) is required

(E03)

A19 - DOCUMENT ISSUE DATE

Date of issue of identification document of master record subject of natural persona type in the YYYY-MM-DD format.

Optional

■ In the case of A06 - Subject type = 01 (natural person) is required

(E03)

In the case of A06 - subject Type = 01 (natural person), the date must be less than or equal to the current date, and must be greater than or equal to the birth date (field A15) (E03)

A20 - PLACE WHERE DOCUMENT WAS ISSUED

Place of issue of identification document of the master record subject of the Natural Person type, indicated according to the indications in Appendix G.

Optional

In the case of A06 - Subject type = 01 (natural person) is required

(E03)

A21 - TRANSFEROR ABI

Transferor Bank ABI code of Transferee Bank that sent the physical flow

• Mandatory (E03)

It must be an ABI code featured in the Appendix C table (E21)

A24 - TRANSMISSION OUTCOME

Field of record transmission outcome: indicated only in transmissions from CBSM to Transferee Bank in case of errors (see Error Handling).

A25 – BANK INFORMATION/BANK

Field of record transmission outcome: indicated only in transmissions from CBSM to a Transferee Bank in case of errors (see Error Handling).

4.4 Formal control of Asymmetrical flow

The third control phase involves verification of the Asymmetrical physical flow from a formal point of view. The following are the record layouts used; for each required field, conducted controls and error codes are also listed. For each required field, it is indicated:

- if mandatory or optional as regards controls carried out by CBSM;
- identification code;
- description;
- format;
- position;
- length.

Asymmetric Head Record

Detection of any of the errors described below will cause rejection of the physical flow and appropriate reporting by CBSM to the sender Transferee Bank.

M/O	Code	DESCRIPTION	FORMAT*	PC	SIT	ION	LENGTH	
IVI/O	Code	DESCRII HON	IONWAI	from to		to	LLINGIII	
M	A00	RECORD TYPE	2n	1	-	2	2	
M	A26	FILE TYPE	8x	3	-	10	8	
M	A27	REFERENCE DATE (YYMMDD)	FERENCE DATE (YYMMDD) 6n 11 -		16	6		
М	A28	PROGRESSIVE DATE	ROGRESSIVE DATE 4n 17 - 20		4			
M	A01	SENDER ABI	5n	21	-	25	5	
M	A29	RECEIVER ABI	5n	26	-	30	5	
М	A30	BUSINESS DATE (YYMMDD)	6n	31	-	36	6	
/	A31	BRIEF DESCRIPTION	15x	37	-	51	15	
M	A32	TRANSMISSION TYPE	TRANSMISSION TYPE 1n 52 - 52		52	1		
/	A33	PREPARATION DATE (YYMMDD)	6n	53	-	58	6	
/	A34	PREPARATION TIME (HHSS)	4n	59	-	62	4	
		FILLER		63	-	200	138	

^{*}Appendix A: description of conventions

A00 - RECORD TYPE

Record Type indicated by " 0"

Mandatory (E03)

A01 - SENDER ABI

ABI code of sender bank of physical flow.

Mandatory (E03)

It must coincide with the physical sender as defined in the file name (E04)

22

Error code

A26 - FILE TYPE

Definition of transmitted file type.

Mandatory (E03)

■ It must be indicated by "FTSMARIN" (E15)

A27 – REFERENCE DATE

Date in YYMMDD format on which the physical flow is produced.

Mandatory (E03)

A28 - PROGRESSIVE DATE

Progressive flow in the Reference Date (code A27).

Mandatory (E03)

It must be unique in the Reference Date (code A27)

A29 - RECEIVER ABI

ABI code of Transferor Bank receiving physical flow.

Mandatory (E03)

The ABI code must be among those provided for in the Appendix C table

A30 - BUSINESS DATE

Date on which the Asymmetrical physical flow in YYMMDD format is transmitted to the Transferor Bank and CBSM.

Mandatory (E03)

A31 - BRIEF DESCRIPTION

Brief description of physical flow.

A32 - TRANSMISSION TYPE

Code identifying the subject's master record type.

Mandatory (E03)

It must be indicated by " 0" (E17)

A33 - PREPARATION DATE

A34 - PREPARATION TIME

Tail Asymmetrical Records

Detection of any of the errors described below will cause rejection of the physical flow and appropriate reporting by CBSM to the sender Transferee Bank.

M/O	Code	DESCRIPTION	FORMAT*	POSITION from to			LENGTH
M	A00	RECORD TYPE	2n	1	-	2	2
M	A26	FILE TYPE	8x	3	-	10	8
M	A27	REFERENCE DATE (YYMMDD)	6n	11	-	16	6
M	A28	PROGRESSIVE DATE	4n	17	-	20	4
M	A01	SENDER ABI	5n	21	-	25	5
M	A29	RECEIVER ABI	5n	26	-	30	5
M	A30	BUSINESS DATE (YYMMDD)	6n	31	-	36	6
/	A31	BRIEF DESCRIPTION	15x	37	-	51	15

M/O	Code	DESCRIPTION	FORMAT*	POSITION from to		LENGTH
M	A32	TRANSMISSION TYPE	1n	52 -	52	1
M	A35	NUMBER OF RECORDS SENT	6n	53 -	58	6
/	A36	AMOUNT - 1	15n	59 -	73	15
/	A37	AMOUNT - 2	15n	74 -	88	15
		FILLER		89 -	200	112

^{*}Appendix A: description of conventions

Error code

A00 - RECORD TYPE

Record type indicated by "99"

Mandatory (E03)

A01 - SENDER ABI

ABI code of sender bank of physical flow.

Mandatory (E03)

It must coincide with the matching field of the head record

(E04)

A26 - FILE TYPE

Definition of transmitted file type.

Mandatory (E03)

It must be indicated by "FTSMARIN" (E15)

A27 – REFERENCE DATE

Date in YYMMDD format on which the physical flow is produced.

Mandatory (E03)

A28 - PROGRESSIVE DATE

Progressive flow in Reference Date (A27).

Mandatory (E03)

It must be unique in the Reference Date (A27)
(E16)

A29 - RECEIVER ABI

ABI code of Transferor Bank receiving physical flow of payments.

Mandatory (E03)

A30 - BUSINESS DATE

Date on which the Asymmetrical physical flow in YYMMDD format is transmitted to the Transferor Bank and CBSM.

Mandatory (E03)

It must coincide with the matching field of the head record

(E23)

A31 - BRIEF DESCRIPTION

Brief description of physical flow.

A32 - TRANSMISSION TYPE

Code identifying transmission type.

Mandatory (E03)

It must be indicated by " 0" (E17)

A35 - RECORD NUMBER SENT

Number of records sent in the physical flow.

Mandatory (E03)

 It must be equal to the number of records in the physical flow including the head and tail record (E18)

A36 - AMOUNT - 1

A37 - AMOUNT - 2

Asymmetric Record

The detection of any of the errors described below will lead to the rejection of the individual record and the appropriate reporting by the CBSM to the sender Transferee Bank.

M/O Code DESCRIPTION FO		FORMAT*	_	_	ION	LENGTH		
					m	to		
M	S01	FLOW SUBMISSION DATE (YYYY-MM-DD)	10x	1	-	10	10	
/	S02	TRANSACTION TYPE FAMILY	2n	11	-	12	2	
/	S03	ANALYTICAL TRANSACTION TYPE			2			
M	S04	ABI CODE	9n	15	-	23	9	
/	S05	TRANSACTION DIRECTION	2n	24	-	25	2	
/	S06	TRANSACTION SIGN	1X	26	-	26	1	
/	S07	TRANSACTION AMOUNT	18n	27	-	44	18	
/	S08	OUTSTANDING	2n	45	-	46	2	
/	S09	PURPOSE OF TRANSACTION 2n 47 - 48		48	2			
/	S10	NATURE OF RELATIONSHIP 2n 49 - 50		50	2			
/	S11	1 RECONCILIATION OF 10x 51 - CHEQUES/BILLS OF EXCHANGE REMITTANCE DATE (YYYY-MM-DD)		60	10			
/	S12	RECONCILIATION OF CHEQUES/BILLS OF EXCHANGE AMOUNT	18n	61	-	78	18	
М	A03	TRANSACTION KEY	40x 79 - 118		118	40		
М	A04	MASTER RECORD KEY	20x	119	-	138	20	
М	A05	MASTER RECORD TYPE	2n	139 - 140 2				
0	A24	TRANSMISSION OUTCOME	1n	141	-	141	1	
0	A25	INFORMATION BANK/BANK	30x	142	-	171	30	
	-	FILLER		172	-	200	29	

^{*}Appendix A: description of conventions

Error code

S01 – FLOW TRANSMISSION DATE

Date of transmission of Asymmetrical physical flow in the YYYY-MM-DD format.

Mandatory (E03)

• It must coincide with the date of transmission of the physical flow as defined in the file name **(E05)**

S02 – FAMILY TRANSACTION TYPE

Indicated in accordance with the provisions of Appendix I.

S03 – ANALYTICAL TRANSACTION TYPE

Indicated in accordance with the provisions of Appendix I.

S04 - ABI CODE

ABI code of sender bank of physical flow.

Mandatory (E03)

It must coincide with the physical sender as defined in the file name

(E04)

S05 - TRANSACTION DIRECTION

S06 - TRANSACTION SIGN

S07 – TRANSACTION AMOUNT

S08 – OUTSTANDING

S09 - PURPOSE OF TRANSACTION

In accordance with the provisions of the mediation agreements in force from time to time, compilation of the field concerning the qualification of the transaction as "ordinary" or "extraordinary" is performed based on the careful weighting of all the elements connoting the transaction in relation to the client's "size" an operating standard. With this in mind, particular consideration is given to:

- the client's assets and liabilities statements;
- consistency with the activity carried out by the client and with the nature of the relationship;
- amount;
- frequency;
- geographical area of counterparty.

The field is structured in accordance with the provisions of Appendix J.

S10 - NATURE OF RELATIONSHIP

S11 - RECONCILIATION OF CHEQUES/BILLS OF EXCHANGE REMITTANCE DATE

S12 - RECONCILIATION OF CHEQUES/BILLS OF EXCHANGE AMOUNT

A03 - TRANSACTION KEY

Unique key identifying the transaction.

Mandatory and structured in accordance with the provisions of Appendix H

A04 - MASTER RECORD KEY

Unique key identifying the transaction.

Mandatory (E03)

A05 - MASTER RECORD TYPE

Code identifying the subject's master record type.

Mandatory (E03)

It must belong to the following set of values:

01 = Client / Relationship nominee

02 = Beneficial owner

03 = Presenter (E06)

A24 - TRANSMISSION OUTCOME

Field of record transmission outcome: indicated only in transmissions from CBSM to a Transferee Bank in case of errors (see Error Handling).

A25 – BANK INFORMATION/BANK

Field of record transmission outcome: indicated only in transmissions from CBSM to a Transferee Bank in case of errors (see Error Handling).

4.5 Completeness assessment of Master Record - Asymmetric flow

The fourth control phase involves checking for the consistency between the data in Master Record physical flow and those in the Asymmetrical physical flow as regards the master record subjects present.

For this purpose, CBSM implements the following controls:

- control that for each master record subject registered in the DBBCSM Data Bank, upon receipt of the Master Record physical flows, the matching subject is present in the data of recorded transactions following receipt of the Asymmetrical physical flows;
- control that for each subject present in the data of the transactions registered upon receipt of the Asymmetrical physical flows, the matching subject is registered in the DBBCSM Data Bank following receipt of the Master Record physical flows.

The control for completeness occurs by verifying that Master records and Asymmetrical records correctly received by Transferee Banks indicate the same master record identification key, formed by the fields:

- o A03 TRANSACTION KEY (identifying the transaction);
- o A04 MASTER RECORD KEY (identifying a master record subject);
- A05 MASTER RECORD TYPE (identifying the subject's master record type).

As regards what is described above, an exception is constituted by the records of the Asymmetrical physical flow in which the Master Record Key field (code A04) is indicated by all twenty required characters equalling '9'. In these cases, the Transferee Bank reports that the subject is unknown and must not transmit any master record to CBSM.

If by mistake a Transferee Bank sends a master record flow containing records with the Master Record Key field (code A04) indicated by twenty characters at '9', records will be ignored and not uploaded in the DBBCSM Data Bank.

The assessments described above are carried out upon expiry of the 14.00 Cut-Off and the 17.00 Cut-Off of business day T_1 .

The detection of any completeness errors leads to appropriate reporting by CBSM to the sender Transferee Bank.

5 Management of the hesitation flows

Hesitation of receipt and control of physical flows and any errors found at CBSM are reported to the Sender Bank by submitting a hesitation physical flow through RIS.

5.1 Hesitation of Master Record and Asymmetrical physical flows: head and tail records

For hesitation reporting of controls carried out on Master Record and Asymmetrical physical flows, CBSM sends to the Sender Bank of the original physical flow, a hesitation physical flow with head and tail records indicated by the same values received, with the exception of the fields listed below:

A01 - SENDER ABI

CBSM ABI code "03225"

A27 – REFERENCE DATE

Date on which error-reporting physical flow is produced.

A28 - PROGRESSIVE DATE

Progressive physical flow in the Reference Date (code A27).

A29 - RECEIVER ABI

ABI code of Sender Bank of physical flow.

A34 - NUMBER OF RECORDS SENT

Number of records sent in the physical flow including the head and tail record

5.2 Error reporting Master Record and Asymmetric physical flows

Following the control phase of the Master Record and Asymmetric physical flow, the possible detection of errors may involve:

- rejection of all the physical flow: in this case, the hesitation physical flow with error reporting contains the head record, tail record and only one record, with the Master Record or Asymmetrical layout, to report the reason for discarding the original physical flow with the fields to be indicated as shown below.
- rejection only of incorrect records: in this case, the hesitation physical flow for error reporting contains the head record, tail record and incorrect original records, according to the Master Record or Asymmetrical layout, with fields containing the values received by the Sender Bank of the original physical flow, with the exception of the fields listed below:

A23 – TRANSMISSION OUTCOME

Indicated by fixed value = 1 - "Negative outcome"

A24 – INFORMATION BANK/BANK

The field is used for exchanging information between the Central Bank and the transferee banks relating to errors detected during the control phase. The field is composed of 5 segments of 6 characters, each of which contains the detail of a detected error.

The first two segments are always present:

1st Segment: reference date (field code A27) of the head record of original physical flow in YYMMDD format 6n;

2nd segment:

progressive date (field code A27) of the head record of originating physical flow 6n;

If there is a 4th segment, the 3rd segment must necessarily be present, etc. The information reported in succession in the 3rd to 5th segments is:

incorrect field code

3x; 3x.

error code

5.3 Error reporting - completeness check

As a result of the control phase for the completeness between the data of the Master Record flows and the Asymmetrical flows, the eventual error detection involves submission to the sender bank of an error reporting physical flow whose layout is described below. The error reporting physical flow will contain a record for each subject for whom no match is found.

Completeness Error Reporting Record

Below is the record layout for the transmission of information about completeness errors detected, and each required field indicates:

- if mandatory or optional.
- identification code:
- description;
- format;
- position;
- length.

M/O	Code	DESCRIPTION	FORMAT*	POSITION from to		_	LENGTH
М	X01	SENDER ABI	NDER ABI 5n 1 - 5		5		
M	X02	FLOW TRANSMISSION DATE	OW TRANSMISSION DATE 10x 6 - 15		10		
		(YYYY-MM-DD)	YYYY-MM-DD)				
M	X03	TRANSACTION KEY	40x	16	-	55	40
M	X04	MASTER RECORD KEY	ASTER RECORD KEY 20x 56 - 75		75	20	
M	X05	MASTER RECORD TYPE 2n 76 - 77		2			
M	X06	FLOW TYPE	LOW TYPE 1X 78 - 7		78	2	
		FILLER	22X 79 - 100		22		

^{*}Appendix A: description of conventions

X01 - SENDER ABI

ABI code of sender bank of Master Record or Asymmetric physical flow.

X02 – ORIGINAL BUSINESS DATE

Value in the Business Date field (code A30), in the YYYY-MM-DD format, of the Master or Asymmetrical record for which no matching master record subject was found.

X03 - TRANSACTION KEY

Unique key identifying the transaction at the level of the San Marino banking system.

A04 – MASTER RECORD KEY

Unique key identifying the transaction at the level of the San Marino banking system.

X05 - MASTER RECORD TYPE

Code identifying the subject's master record type.

X06 – FLOW TYPE

Code that identifies the type of physical flow on which a no-match subject was detected, which can be indicated by:

A = Master Record physical flow S = Asymmetrical physical flow

5.4 Flows in response to error reporting

Following error reporting by CBSM involving the rejection of individual records, Transferee Banks must send the correct records in subsequent physical flows dedicated specifically to the purpose, according to layouts provided for Master Record and Asymmetrical physical flows.

5.5 Positive hesitation of Master Record and Asymmetrical physical flows

Following the control phase of the Master Record and Asymmetrical physical flow, if no error is detected, the hesitation physical flow contains the head record, tail record and only one record, with the Master Record or Asymmetrical layout, to report the correct transmission of the physical flow, indicated as shown below:

A23 - TRANSMISSION OUTCOME

Indicated by fixed value = 0 - "Positive outcome"

5.6 Duplicated Master Record identification key

Following receipt of the Master Record and Asymmetric physical flows, the possible detection of correct records whose identification key is already in the DBBCSM Data Bank entails their being discarded. The Master Record identification key is composed of:

- o A03 TRANSACTION KEY (identifying the transaction);
- A04 MASTER RECORD KEY (identifying a master record subject);
- o A05 MASTER RECORD TYPE (identifying the subject's master record type).

5.7 Identification Master Record key incorrect

If, for any reason, a Transferee Bank finds that it transmitted to CBSM and to the Transferor Bank, by means of a Master Record flow and/or Asymmetrical flow, a record with incorrect Master Record identification key, it must:

- a. notify CBSM and the Transferor Bank at once with indication of the incorrect Master Record identification key and the reasons for the error;
- b. If the record with an incorrect Master Record identification key should be re-proposed, it must transmit a new record with the correct Master Record identification key for each flow type, i.e. Master Record and/or Asymmetrical, in which it was entered incorrectly;
- c. send to CBSM a formal request for the storage of Asymmetrical/Master records, already acquired in DBBCSM, for which errors were found in the Master Record identification key, and correct (Asymmetrical and Master) records were re-sent. This communication, signed by the Head of the Executive Structure, must contain both the (suitably numbered) list of identification master record keys to be filed and a statement that they match the contents of the electronic files attached to the list (CD/DVD ROM, USB key). The request must also be accompanied by a note from Internal Auditing in which, in addition to confirming the correctness of the new Master Record data sent as a replacement of the previous incorrect records, reference is made to the factors that determined the error and the actions taken by the company to prevent the recurrence of similar anomalies.

Appendix A: Representation conventions

n numeric characters only

x alphanumeric characters (letters and numbers) only

Code Field Identification Code

M mandatoryO optional

Appendix B: Error reporting codes

Code	Description
E01	Missing detailed records
E02	Sequence error
E03	Missing mandatory data
E04	Non-matching sender ABI
E05	Non-matching flow transmission date
E06	Incorrect Master Record Type
E07	Incorrect Subject Type
E08	Incorrect Country UIC (Italian Foreign Exchange Office) Code
E09	Incorrect Identification Code Type
E10	Incorrect Document Type
E13	Incorrect transmission outcome
E14	Incorrect Record Type
E15	Incorrect File Type
E16	Non-unique progressive number
E17	Incorrect transmission type
E18	Record number error
E19	Record type is not allowed
E20	Receiving ABI code error
E21	Transferor ABI code error
E22	Incorrect Reference Date
E23	Incorrect Business Date
E24	Code congruency error – Master Record Key
E25	Transferee ABI code error
E26	Province code error
E27	Duplicate key
E28	Missing separator " +" between Surname and Name
E29	Identification Code convention is not correct
E30	Inconsistency between country of residence and identification code type

Appendix C: Transferor Banks' ABI Codes

ABI Code	Description
05000	ICBPI - [Istituto Centrale Banche Popolari Italiane] Central Institute of Italian Co-
	operative Banks

Appendix D: Conventions and controls of Master Record Key and Identification Code

The field A04 – MASTER RECORD KEY and the field A14– IDENTIFICATION CODE are alphanumeric fields with alignment of the contents to the left and "blank" filler character. Below is the common representation convention of the two fields based on the value of field A13 - IDENTIFICATION CODE TYPE:

Identifying Code Type	Description Identification Code Type	Convention
01	Tax Code	Alphanumeric code with fixed length of 16, on which the verification of correctness is carried out by the control character by applying the algorithm required to generate it.
02	ISS	Numeric code of variable length
03	Passport or European identity card	Alphanumeric code composed as follows: 2 characters for ISO country code + passport code, i.e. Alphanumeric code composed as follows: 2 characters for the ISO country code + identity card code of the European country of residence, other than Italy
06	Vat Registration No.	Numeric code of fixed length 11
07	COE	Alphanumeric code composed as follows: 2 fixed characters "SM" + 5-character numeric code with any zeros to fill spaces after the first two characters (e.g., SM01234; SM56789).
08	Foreign country identification code	Alphanumeric code composed as follows: 2 characters for ISO country code + company identification code in foreign country

Below are the controls applied to field A14 - - IDENTIFICATION CODE on the basis of the value of field A13 - IDENTIFICATION CODE TYPE:

Identification Code Type	Controls applied to the field A14 - Identification code
01	The identification code must be an alphanumeric string with length equal to 16, on which the verification of correctness is carried out through the control character by applying the algorithm required to generate it.
02	The identification code must be numeric and comprised in the range between 1 and 999999 (numeric codes formatted with zeros to the left, e.g. 012345, are also valid).
03	The first two characters of the identification code must be an existing ISO country code.
06	The identification code must be numeric and comprised between the range from 1 to 9999999999
07	The first two characters of the identifier code must match the ISO code of San Marino ("SM"), the remaining part of code must be numeric in the range between 1 and 99999 (numeric codes formatted with zeros to the left, e.g. 01234, are also valid).
08	The first two characters of the identification code must be an existing ISO country code.

Appendix E: ABI codes Transferee banks

ABI Code	Description						
03034	BAC – Banca Agricola Commerciale Istituto Bancario Sammarinese						
03145 BISM – Banca Impresa di San Marino							
03225 CBSM – Central Bank of the Republic of San Marino							
03262	03262 ASB – Asset Banca						
03287 BSI – Banca Sammarinese di Investimento							
03530 CIS – Banca CIS							
06067	06067 CRS – Cassa di Risparmio della Repubblica di San Marino						
08540	BSM – Banca di San Marino						

Appendix F: Provinces Convention

Country	Description of value-assignment of field code A10
San Marino	'SM'
Abroad	'EE'
Italy	indicated by a valid two-letter abbreviation for Italian
	provinces

Appendix G: Place where documents are issued

Country	Description of value-assignment of field code A10
San Marino	In the case of a San Marino identification document, the place of issue must be indicated as "San Marino".
Italy	In the case of an Italian identification document, the place of issue must be identified as the municipality where the document was issued.
Abroad	In the case of a foreign identification document, the place of issue must be identified as the place where the document was issued.

Appendix H: Transaction key structure

The field A03 – TRANSACTION KEY involves the following structure for the application family:

Family	Direction		Length	Format	Notes / Possible Values
RNI	From S. Marino to E.U. From E.U. to S. Marino	Ordering ABI / sender ABI	5	Numeric	
		Originating CRO (transaction reference code) / CRO	11	Numeric	
		Transaction reference date	6	Numeric	Date on which the provision is entered by the issuing Bank and is received by the payment intermediation system. In general, it is found in the field identified by the code 031
		Empty	18	Alphanumeric	Spaces
SWIFT	From S. Marino to E.U. From E.U. to S. Marino	Transferor BIC / sender BIC	11	Alphanumeric	
		TRN	20	Alphanumeric	
		Transaction reference date	6	Numeric	Date on which the provision is entered by the issuing Bank and is received by the payment intermediation system. It is generally present in the field as identified by the code 032A or D65
		Empty	3	Alphanumeric	Spaces
Cheques	From S. Marino to E.U.	ABI	5	Numeric	
	From E.U. to S. Marino	CAB (Bank Routing Code)	5	Numeric	
		Cheque no.	10	Numeric	
		Empty	20	Alphanumeric	Spaces
Bills of exchang e		Assignor ABI	5	Numeric	
		Bill of exchange Number (code line)	10	Numeric	
		Empty	25	Alphanumeric	Spaces
Redempt ions		Redemption Type	2	Numeric	00 Mav (payment by advice) 01 Cash order 02 Direct Debit Standing Order
		ABI	5	Numeric	3
		Collection Number	20	Numeric	Contracting bank
		Empty	13	Alphanumeric	Spaces
Sepa SCT		Sender BIC first 6 characters to the left	6	Alphanumeric	
		Year	2	Numeric	Year of transaction settlement date
		Transaction Reference Date (Julian Calendar Day)	3	Numeric	Transaction settlement date in the Julian Calendar Year format
		Trnid first 29 characters to the left	29	Alphanumeric	Starting from the left, always the first 29 bytes
Sepa SDD		Sender BIC first 6 characters to the left	6	Alphanumeric	
		Year	2	Numeric	Year of transaction settlement date
		Transaction Reference Date (Julian Calendar Day)	3	Numeric	Transaction settlement date in the Julian Calendar Year format
		Trnid first 29 characters to the right	29	Alphanumeric	From the first significant right-hand byte; in the presence of bytes = blank on the right side that are more than 6 bytes, exclude only the first 6 bytes

Appendix I: Family Structure and transaction Analytical

The fields S02 – FAMILY TRANSACTION TYPE and S03 – ANALYTICAL TRANSACTION TYPE involve the following method of related value-assignment:

Transaction Type	Family	2	Numeric		Family		Analytical
	Analytical	2	Numeric	01	Wire transfers	00	
				02	Gross-settled wire transfers	00	
				03	Cheques	00	Bank Cheque
				03	Cheques	01	Banker's Draft
				03	Cheques	02	Foreign Cheque (E.U.)
				03	Cheques	03	Outstanding cheque
				03	Cheques	04	Paid cheque
				04	Bills of exchange	00	
				05	Redemptions	00	Mav (payment by advice)
				05	Redemptions	01	Cash order
				05	Redemptions	02	Direct Debit Standing Order
				09	Sepa SCT	00	
				10	Sepa SDD	01	CORE
				10	Sepa SDD	02	B2B

Appendix J: Purpose of transaction

The field S09 – PURPOSE OF TRANSACTION involves the following code:

Purpose of transaction	2	Numeric	00	Transaction in the ordinary management of business activity
			01	Transaction in the ordinary management of professional activity
			02	Transaction in the ordinary management of family activity
			03	Transaction in the ordinary management of financial activity
			04	Transaction in the extraordinary management of business activity
			05	Transaction in the extraordinary management of professional activity
			06	Extraordinary transaction carried out for family requirements
			07	Transaction in the extraordinary management of financial activity