BANCA CENTRALE
DELLA REPUBBLICA DI SAN MARINO

POLICY ON THE PROCESSING OF PERSONAL DATA
EXTERNAL PARTIES
pursuant to Article 13 and Article 14 of Law No. 171 of December 21, 2018 'Protection of natural persons with regard to the processing of Personal Data'"

Preamble

This document is drawn up by the Central Bank of the Republic of San Marino (hereinafter "**CBSM**" or "**Controller**"), in its capacity of Data Controller and in compliance with the legislation in force on the protection of Personal Data, specifically Article 13 of Italian Law no. 171 of 21 December 2018 as amended, entitled "Protection of natural persons with regard to the processing of Personal Data" (hereinafter "**Law**") and Article 13 of the EU Regulation 2016/679 (hereinafter "**GDPR**"). This document aims to provide information on the processing of the Personal Data that may be acquired for the establishment and management of contractual relationships between the Central Bank of San Marino and the suppliers or associated third-party companies. Personal Data (hereinafter "**Personal Data**") are processed by CBSM and/or via third parties, by means of both electronic and non-electronic tools, for the purposes indicated below.

To define Personal Data, reference is made to the UK GDPR: "**Personal Data** means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, either directly or indirectly, through identifiers such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity". This privacy policy (hereinafter "**Policy**") concerns the processing of Personal Data carried out by CBSM for the purposes described in Section 5.

SECTION 1 - CONTACT DETAILS OF THE DATA CONTROLLER

Pursuant to Article 2 of the Law, the Data Controller acting for the purposes set out below is the Central Bank of the Republic of San Marino, whose headquarters and General Directorate are located at Via Del Voltone n. 120, 47890 – San Marino (Republic of San Marino).

For additional information, individuals can contact the Data Controller via email at privacy.titolare@bcsm.sm or by sending a written request to Banca Centrale della Repubblica di San Marino, Via del Voltone n. 120, 47890 – San Marino (RSM). Alternatively, the Data Controller can be contacted by phone at +378 0549 981010 or by fax at +378 0549 981019.

SECTION 2 - CONTACT DETAILS OF THE DATA PROTECTION OFFICERS

The Controller has appointed Ms Valentina Rabitti and Mr Nathaniel Casadei as "Data Protection Officers" (hereinafter, "DPOs"), in accordance with Chapter 4 of the Law. For all issues relating to the processing of Personal Data and/or to exercise the rights envisaged by the Law itself, listed in Section 10 of this Policy, please, send an email to privacy.dpo@bcsm.sm, or a letter to "Nova Poesis, Via Pomposa no. 43/l, 47924 – Rimini (IT)", addressed to the DPOs.

SECTION 3 - TYPES AND SOURCE OF PERSONAL DATA SUBJECT TO PROCESSING

The Personal Data collected and processed by CBSM in the capacity of Controller for the performance of the Services detailed in Section 5 may include personal details, residence and/or home address, mailing address, contact details, such as telephone number and email address, unique identification code – Social Security Number or equivalent code. Certain specific activities (e.g., video surveillance at entrances) may involve the collection and processing of certain types of biometric data.

If the processing purpose is to protect the health of those who have access to the CBSM premises, "Special Categories of Personal Data" may be processed, namely those data revealing "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation" which may be required pursuant to the Law. Only specifically appointed staff is authorised to process such data.

The processing of any of the above listed data that you may provide can only be carried out following your written consent at the bottom of this policy. However, if the processing is carried out in accordance with Article 8, paragraph 2, letters g) and i) of the Law (see cases mentioned in the preceding paragraph), it will not require prior consent.

In the event that the CBSM becomes aware of data belonging to the abovementioned "Special Categories" which is unrelated to its specific purposes – possibly due to unsolicited communication from external visitors or other sources – CBSM undertakes to retain such data without processing it, while ensuring that all the rights of the Data Subject under Chapter 3 of the Law are fully upheld.

SECTION 4 - PURPOSES AND LEGAL BASIS FOR THE PROCESSING

Visitors to the headquarters shall voluntarily communicate their data to the reception staff, who shall record it on paper forms after verifying each individual's identity. Such procedure is followed in the following situations:

- Visits or interventions
- Meetings or work sessions

- Delivery or collection of goods, packages, correspondence

The aforementioned Personal Data is processed for the following purposes:

- To control access to the premises
- To monitor the duration of visitors' stay inside the premises
- To identify individuals accessing the premises for emergency management

and they shall be processed in accordance with the principles of fairness, legality, transparency, and the protection of the individuals' privacy and rights.

The Data is legitimately acquired and processed in order for the Data Controller to verify the identity of individuals accessing its institutional premises, as well as to protect social security and social welfare, as set out in specific legal provisions treating controls carried out in the public interest. The Data Subject may choose whether or not to provide their Personal Data, since there is no obligation in this regard. However, should the Data Subject refuse to provide their Personal Data, access to the facility will be denied.

SECTION 5 - DATA PROCESSING METHODS

The processing of Personal Data for the purposes set forth above is performed using both automated means, such as electronic or magnetic means, and non-automated means, such as paper-based processes, in compliance with the legal requirements of confidentiality and security established by the Law, ensuing regulations, and internal rules. Upon visitors' arrival, the reception staff must always ensure that the previously collected data is duly preserved so that it is not visible to other visitors. To achieve this, the forms containing Personal Data are never made available to visitors in a way that would allow them to view the recorded entries of the day. In such a way, confidentiality of the information collected is fully ensured.

In case of the processing of data already provided upon previous access to the CBSM premises, visitors do not have to renew their written consent (when required), provided that the subsequent processing occurs within the time period outlined in Section 9. However, the Data Subject can always choose to request a copy of this policy again in case of a new access.

SECTION 6 - DISCLOSURE OF DATA

Without prejudice to the Data transmitted to fulfill legal obligations, all collected and processed Personal Data may only be transmitted for the aforementioned purposes to the following categories of individuals:

- authorised employees of the Data Controller (referred to as "Data Processors")

- external parties collaborating with the Data Controller, designated as Authorised Data Processors, which operate under the authority of the Data Controller
- entities that provide services or perform tasks to fulfil specific requests from visitors on behalf of the Data Controller and within the established limitations
- individuals authorised to access it under provisions of the law, regulations, and community norms

Potential transmission of Personal Data to External Data Processors, professionals, consulting firms, etc., will in any case occur under a specific appointment contract outlining the roles and responsibilities of the external party, in accordance with current laws and regulations.

The list of the entities to whom we transmit the data and the limitations of their use are available at our office location at any time.

SECTION 7 - TRANSFER OF DATA TO THIRD COUNTRIES

The Data Controller does not transfer Personal Data to third countries or international organizations.

SECTION 8 – DATA RETENTION TIMES

Starting from their receipt/update, the Personal Data provided shall be stored in our archives for a period of time which is appropriate to the abovementioned processing purposes.

Upon request, CBSM can provide the Data Subjects with more detailed information about the applicable retention periods for each Personal Data, which shall generally not exceed 9 months – it can be extended to 12 months in case of unusual events or circumstances requiring further checks and/or investigation. After such period, the data will be deleted.

The Personal Data shall be stored on paper and/or electronic media only for the time necessary to the purposes for which they were collected, in accordance with the principles of storage limitation and data minimization as defined in Article 4, paragraph 1, letters c) and e) of the Law. The Personal Data shall be stored in order to comply with regulatory obligations and the aforementioned purposes, in accordance with the principles of indispensability, lack of excess, and relevance. CBSM may retain the Personal Data after the termination of the contractual relationship to comply with regulatory and/or post-contractual obligations. Thereafter, once the aforementioned reasons for processing are no longer applicable, the Personal Data shall be erased, destroyed, or simply stored anonymously. For further information, please, contact CBSM using the contact details provided in in Section 11.

SECTION 9 – AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING

CBSM does not process Personal Data through any automated decision-making processes, including profiling as mentioned in Article 22 of the Law.

SECTION 10 – RIGHTS OF THE DATA SUBJECT

The Data Subject may exercise against CBSM the following rights set out in the legislation on Personal Data Protection at any time. To do so, the Data Subject must submit a specific written request to the Central Bank of the Republic of San Marino using one of the following means:

- recorded delivery letter addressed to Banca Centrale della Repubblica di San Marino, Via del Voltone no. 120 – 47890 San Marino (RSM)
- email to privacy@bcsm.sm
- fax to + 378 0549/981019

Consent to this Policy may be revoked at any time using the same means.

a) Right of access

The Data Subject shall have the right to obtain confirmation from CBSM of whether its Personal Data are being processed, and, if so, request access to the Personal Data and information envisaged by Article 15 of the Law. This includes obtaining information about the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom the data may be disclosed, the applicable retention period, and the existence of automated decision-making processes, among others.

b) Right to rectification

The Data Subject has the right to obtain from CBSM, without undue delay, the rectification of their Personal Data, in case of inaccuracies. Additionally, considering the purposes of the processing, the Data Subject may request the completion of their data, if it is found incomplete, by providing a supplementary statement.

c) Right to erasure

The Data Subject has the right to request the erasure of their Personal Data from the Controller, if one of the reasons set forth by Article 17 of the Law applies. The Data Subject may exercise such right if their Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed or if consent to the processing has been revoked and there is no other legal basis for processing their Personal Data. However, the revocation of consent shall not affect the lawfulness of any processing carried out prior to such revocation. Please, note that CBSM may not be able to erase Personal Data if its processing proves necessary to comply with legal obligations, for reasons of public interest, or for legal purposes such as establishing, exercising, or defending legal claims.

d) Right to restricted processing

The Data Subject may request that the processing of their Personal Data be restricted where one of the circumstances envisaged by Article 18 of the Law applies. This may include circumstances in which the Subject deems their data incorrect, or when the data is necessary for legal purposes such as establishing, exercising, or defending legal claims, even though CBSM no longer needs it for its original processing purposes.

e) Right to object

The Data Subject may object to the processing of their Personal Data at any time, especially if the processing is carried out for the performance of an activity in the public interest or for the pursuit of the Data Controller's legitimate interests, including profiling, as specified in Article 21 of the Law. Should the Data Subject decide to exercise their right to object, CBSM shall refrain from processing their Personal Data any further, unless there are compelling legitimate reasons for the processing which outweigh the interests, rights and freedoms of the Data Subject or for the establishment, exercise, or defence of legal claims.

f) Right to lodge a complaint with the Data Protection Authority

Without prejudice to the Data Subject’s right to seek remedies in any other administrative or judicial authority, they may lodge a complaint with the Data Protection Authority if they believe that the processing of their Personal Data by the Controller violates the Law and/or the applicable regulations.

BANCA CENTRALE
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CONSENT OF THE DATA SUBJECT TO THE PROCESSING OF PERSONAL DATA

Having viewed and understood all the information stated above,

I, the undersigned _____,

born in _____ on _____

(city, country) *(date of birth)*

residing in _____

(city, country)

at the following address:_____

Tel:_____

Hereby declare to have received this policy compliant to Articles 13 and 14 of Law No. 171 of December 21, 2018, and subsequent amendments, regarding the processing of Personal Data. Having thoroughly read the provided policy, and being fully informed about the processing of Personal Data, including "special categories of Personal Data" as defined in Article 8 of the Law.

By ticking the box below, I hereby consent to the processing and sharing of my Personal Data for all the purposes outlined in this policy.

☐ **consent** ☐ **DO NOT consent**

San Marino,

Date: _____

Legible signature: