

NOTICE FOR APP SERVICE CUSTOMER
PROCESSING AND SAFEGUARD OF PERSONAL DATA FOR NATURAL PERSONS THROUGH MyBSI APP IN ACCORDANCE WITH THE ARTICLES 13 AND 14
OF THE LAW OF SAN MARINO N.171 DATED 21 DECEMBER AND THE UE REGULATION 679/2016

I. INTRODUCTION

In its business and activity, Banca Sammarinese d'Investimento S.p.A (abbreviated below as “BSI”) provides its mobile app called MyBSI (abbreviated below as “App”) as a tool for its customers (also indicated below as “Involved” and/or “Customer”) that is available for mobile use of many services offered by BSI (abbreviated below as “AppService”).

The AppService is a tool and a service linked to basic services already provided by BSI to its Customer (e.g. bank account opening contract), thus, this document is aimed only at providing, to whom it may concern, those pieces of information related to the processing and safeguard of personal data connected to the use of the AppService (abbreviated below as “AppService Notice”). Therefore the App Service represents a supplement of the *PROCESSING AND SAFEGUARD OF PERSONAL DATA FOR NATURAL PERSON THROUGH* IN ACCORDANCE WITH THE ARTICLES 13 AND 14 OF THE LAW OF SAN MARINO N.171 DATED 21 DECEMBER AND THE UE REGULATION 679/2016 (also indicated below as “Customer Notice”) and it shows information regarding the use of the App Service.

This notice is referred exclusively to the use of data treated through the AppService (it is not referred to other further Services) which happens in full compliance with the law of San Marino n. 171 of 21st December 2018 concerning the protection of data of natural persons with reference to treatment of personal data (also indicated below as “RSM Privacy Law”) as well as, where it is applicable, the UE Regulation n. 2016/679 concerning the protection of data of natural persons and treatment of personal data and also the free circulation of the above the same data (also indicated below as “GDPR”).

The information provided by the Customer to BSI through the App for the mobile banking services are treated legally, properly and transparently in accordance with the mandatory principles of minimization, integrity and privacy.

The App offers a number of Services for example (i) the notification of the transaction executed (ii) the news forwarded by the bank (iii) the management of the authorizations required by the customer for the transactions instructed by himself (iv) the registration of the security codes for the 3DS service linked to the credit cards.

II. OWNER OF THE INFORMATION STORED AND TREATED THROUGH THE APP, REPRESENTATIVE, SUPERVISOR OF THE DATA PROTECTION, CO-OWNER OF THE TREATMENT

Owner of the data treatment is BSI.

BSI has delegated as its representative subject in the European Union, under the art. 27 of GDPR, Studio Associato Dottori Commercialisti – Partners, with headquarters in Rimini (RN) Via di Duccio n. 8/b, which can be contacted in relation to this notice at gdini@partnerstudio.com or at this phone number 0541/787476 (also indicated below as “Representative”).

The responsible of the data protection (see Point IV of the RSM Privacy Law and Point IV, Section 4 of the GDPR) delegated by BSI can be contacted in relation to this notice at dp@bsi.sm or at this phone number 3316106575.

Currently, there are no situations in which BSI determines jointly with another subject owner of the purposes treatment and modes of treatment. In case this situation happens BSI and the owner will find an internal agreement for respective responsibilities in relation to the commitments imposed by the law regarding the informative obligation and the rights of the person involved.

III. TYPE AND CATEGORY OF THE DATA TREATED THROUGH APPSERVICE

After downloading, installation and use of the App, BSI will treat the Customer information, in this way it is possible the proper identification. The same information can be treated by BSI in case the data is provided by the customer spontaneously (e.g. password and username inserted for login or other identification code) or in case of analysis of the customer activity through the App.

In the specific BSI could treat the following information:

a) Personal information: that is name, surname, contacts.

Logging in the App with the passwords and codes provided by BSI to the customer, the bank can treat some pieces of information such as name, surname, e-mail, phone number, address.

b) Information of the device used by the Customer

The Customer can download the App from the store and install it on the mobile device (“Device”). In this way BSI could have available some Personal pieces of information and other details on the Device used for the successful installation of the App (e.g. phone model, software version, screen resolution, language, type of connection etc). Thus, the information treated is part of the installation of the App and the Customer can decide to cancel at any time if the App is removed/cancelled from the Device.

c) Data provided through the Device

Once installed, and only for correct service use reasons, it can be asked the customer to activate some functions of the Device such as:

i. Geolocalization: that is the tool used for estimating the geographic position of the Device (e.g. the Customer is able to find a specific BSI branch and to calculate the itinerary to reach it). The geolocalization is optional and the Customer can use the App also without it.

ii. Camera: that is the tool required for using the service QR code, without inserting the information manually (e.g. for a payment). The activation of the camera is optional and the Customer can use the App also without it (e.g. using the manual options or using the branch bank services of BSI).

iii. Contacts: that is the tool used for saving contact information (e.g. Help Desk number) in the phone book of the Device. This tool is optional and the Customer can use the App also without it.

iv. Filing: that is the tool that enables the App to receive and transmit documents stored in the memory of the Device. This tool is optional and the Customer can use the App also without it (e.g. using the branch bank services of BSI for providing or receiving documents). The activation of other tools of the Device can be asked for the correct use of *online banking services* (e.g. phone number, useful phone numbers of the bank, useful phone numbers for credits cards such as Cartasi, Bancomato, Diners, Bankamericard, Co-op Credi Card)

The tools regarding the Geolocalization, Camera, Contacts, Filing can be disabled on the Device following the related instructions.

BSI could file the unknown information linked at the *download* or at the use of the App for statistical purposes.

The IT systems and the softwares used by third subjects involved in the use of the App (e.g. Apple, Google etc) can acquire some pieces of information on the users (e.g. during the download phase). The transmission of the information is part of the communication protocols of the Device. Thus, BSI is not involved in the above mentioned activity (the third parties are the owners and they conduct these activities on their own)

IV. CUSTOMER NOTICE REFERENCE

The treatment of the data executed by BSI within the AppService is done respecting the Customer notice (purpose, law aspects, use and transmission of data, addressee of the data, list of Customer rights) and the further notices from BSI regarding the execution of banking operations not included in the AppService but directly or indirectly linked to it (e.g personal data for payment services, personal data for credit area purposes).

V. COMPLETENESS AND AMENDMENTS

This privacy notice document is provided in its complete version and it substitutes any other regulation issued before today with reference to personal data of the Customer through the App. BSI has the right to amend or update the content of this document (partially or fully) also due to future regulations changes. BSI will inform their customers promptly in case of modifications of updates and the will be in force as soon as they are published in the bank website www.bsi.sm or transmitted to the Customer in another way (e.g communication via branches or ATMs)
In the bank archives the documentation referred to privacy and data protection will be always available and up to date.