

# PRIVACY DISCLAIMER

## SAN MARINO TOURISMO BOARD – PARKING DEPARTMENT

Information provided pursuant to articles 13 and 14 of the GDPR (General Data Protection Regulation) 679/2016 and of articles 13 and 14 of Law no.171 of 21 December 2018 and subsequent amendments.

This document indicates the ways in which the Public Administration processes your personal data.

### a) Data Controller

The Data Controller of the personal data of the Public Administration is the **Director of the Public Function Avv. Manuel Canti**, appointed by the Hon. Congress of State of the Republic of San Marino, by virtue of a delegation pursuant to Article 23, paragraph 3, letter k) of Law no.188 of 5 December 2011.

Address: Via della Capannaccia, 13 - 47890 San Marino - Republic of San Marino.

tel: (+378) 0549 882837

fax: (+378) 0549 882835

email: info.directiongeneralfunctionpublic@pa.sm

### b) Data Protection Officer

The Data Protection Officer is designated pursuant to art. 38 of Law 171/2018, and in the Public Administration it is identified in the "Office of the Data Protection Officer" (as required by the Resolution of the Congress of State No. 9 of 9 August 2021).

Interested parties can contact the Data Protection Officer for all matters relating to the processing of their personal data and the exercise of their rights deriving from the aforementioned law.

Contact details are as follows:

Address: Via della Capannaccia, 13 - 47890 San Marino

Tel: 0549 885872

Email: privacy@pa.sm

### c) Purpose of the processing

Personal data provided will be processed to pursue the following purposes:

- Issue of season tickets for one or more car parks managed by the State;
- Telephone contact in case of need (badly positioned vehicle, occupation of a stall reserved for other categories of subjects, ...)
- Issue of non-payment assessment, if the user parks without a regular parking permit;
- Management of the parking of guests of San Marino accommodation facilities (license plate and e-mail address provided to the Tourism Board - Parking Department, by the accommodation facility)

- Management of access to car park no.7 for students owning minicars who attend Secondary School in the historic center of San Marino.

Purposes of the processing related to video surveillance:

- Protection of the assets owned by the State located inside the car parks (parking meters, automatic cash machines, equipment);
- Public order;
- Traffic monitoring and filling status of car parks;
- Creation of statistics through the collection of aggregated data.

The Tourism Board - Parking Department does not collect any information that is not necessary for the execution of the aforementioned purposes and for the performance of tasks of public interest or related to the exercise of public authority and in the context of administrative processes and proceedings that it manages.

According to the indicated legislation, the processing of your data will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

#### **d) Legal basis for data processing**

The treatment is lawful according to law n.171 / 2018, art. 5, paragraph 1, letter e), according to which *"processing is necessary for the performance of a task of public interest or connected to the exercise of public authority vested in the data controller"*.

The processing of the data you provide does not therefore require your consent as it can be lawfully carried out as it is aimed at carrying out a task of public interest or connected to the exercise of public authority.

#### **e) Categories of recipients of the processed personal data**

The Tourism Board - Parking Department may transfer your data to other Public Offices and acquire your data from other Public Offices.

The data will be processed, for the purposes of Article 29 paragraph 3 of Law No. 171 of 21 December 2018, by Sinpar SpA (Data Processing Manager), a company designated by the Data Controller by a specific deed.

Without prejudice to communications made in compliance with legal and contractual obligations, all data collected by the Public Administration may be processed, without your consent and solely for the performance of tasks of public interest or related to the exercise of public authority:

- from the offices and services of the entire Extended Public Sector;
- by third parties authorized by the Public Administration appointed or involved in the performance of a public service;
- personal data may be made available to the judicial authorities and/or authorized persons, upon specific request. The data collected are not subject to communication or dissemination;
- video recordings data are stored on the servers of the Tourism Board - Parking Department and authorized companies.

Your data may also be transferred, without any prior authorization and without the need for your consent:

- if the transfer is necessary for important reasons of public interest;

- if the transfer is necessary to ascertain, exercise or defend a right in court;
- if the transfer is made from a Register that aims to provide information to the public and can be consulted both by the general public and by anyone able to demonstrate a legitimate interest, only on condition that the requisites for consultation are met by special rules. In these cases, the transfer cannot, however, concern all personal data or entire categories of personal data contained in the register; furthermore, if the register is intended to be consulted by persons having a legitimate interest, the transfer is permitted only at the request of such persons or if such persons are the recipients.

#### **f) Provision of data and refusal**

The provision of the requested data is optional, but necessary for the purpose of fulfilling the obligations and requests.

#### **g) Categories of processed personal data**

The personal data required in order to carry out the task of public interest or related to the exercise of public authority, are the following:

- a) name and surname
- b) residential address
- c) telephone/e-mail
- d) car license plate

The communication of the aforementioned data is voluntary, but necessary for the fulfillment of your requests, and their failure, partial or incorrect conferment has, as a consequence, the impossibility of fulfilling your request.

#### **h) Retention period**

Your data is kept for a period of two years. Once an information is no longer useful in order to carry out a given function or current affairs, it could still be kept according to the archival rules of the State.

- With regards to the recordings of video surveillance systems, it is specified that the recording time has been deliberately omitted for safety reasons, however in order to comply with current regulations, the recording time predefined by the system is available to the supervisory authorities competent in a separate document.

However, a longer retention period may depend on the need to adhere to specific requests from the judicial authorities or the Judicial Police in relation to any ongoing investigative activity.

#### **i) Rights of the interested party**

The rights of the interested party concerning the processing of personal data are provided for in Articles 15 to 22 of Law 171/2018, including:

- Right to obtain confirmation as to whether or not personal data concerning him is being processed and, in this case, to obtain access to personal data and related information required by law;
- Right to obtain the correction of inaccurate personal data concerning him without undue delay;
- Right to obtain the integration of incomplete personal data;
- Right to obtain the limitation of processing in the cases provided for by law and provided that such processing is not functional to pursue a significant public interest.

To know all the rights of the interested party, please consult Law no. 171/2018, articles from 15 to 22.

### **l) Processing methods**

Personal data are processed with IT and/or paper tools. The data you provide will be processed by adopting specific security measures to prevent data loss, illicit or incorrect use and unauthorized access.

If the person providing the data is under the age of 16, the processing is lawful only if there is consent from the holder of parental responsibility.

### **m) Complaints and reports**

In the event of complaints, reports, requests for information on the exercise of your rights, you can contact the **Guarantor Authority for the protection of personal data**:

address: Contrada Omerelli, 43 - 47890 San Marino - Republic of San Marino.

tel: (+378) 0549 883154

email: [ufficio.segreteria@agpdp.sm](mailto:ufficio.segreteria@agpdp.sm)