MASTER DATA PROCESSING AGREEMENT
IN ACCORDANCE WITH REGULATION (EU) No. 679 OF 27 APRIL 2016 AND LAW 171/2018 REP. OF SAN MARINO

ENTERED BETWEEN

- **San Marino Viaggi e Vacanze S.p.A**., Via 3 Settembre 99 47891 Dogana, C.O.E. (Economic Operator Code) SM 02851, Republic of San Marino, (hereinafter, "the Processor")

- The subject referred to as Client in Contracts/Trade Agreements (e.g. travel agencies, hereinafter "the Controller")

- The subject referred to as Supplier in Contracts/Trade Agreements (hereinafter "the Sub Processor")

The parties agree as follows:

I.   **Terms and conditions**
Setting the rules according to which the Processor and Sub Processor undertake to perform the data processing operations listed below on behalf of the Controller. In the context of their contractual relations, the parties undertake to comply with the regulation in force on personal data protection and, in particular, with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable from 25 May 2018 for all the Member States (hereinafter, "G.D.P.R."), and with Law 171/2018 of the Republic of San Marino.

II.   **Personal data undergoing processing**
The Processor and sub Processor are authorised to process, on behalf of the Controller, only the personal data necessary for the purpose of organising and managing trips for groups. Purpose of the processing: supplying the service mentioned above. The types of data which are subject to the processing: ordinary and sensitive data of natural persons for whom the Processor organises group trips on behalf of travel agencies (Controllers) and who will enjoy the services (accommodation and/or ancillary services like tickets, visits, tours, etc.) supplied by the Sub Processor.

III.   **Duration**
These provisions shall be in force until *31/12 of this year and will be automatically renewed*, unless written notice of termination or changes is given by either Party.

IV.   **The Processor and Sub Processor undertake to**:
1. Process data only for the purposes specified above, for the performance of contractual obligations and in line with the instructions of the Controller; 2. *Safeguard the confidentiality of the data processed* under this agreement; 3. *Make sure that the persons authorised to process personal data* under this agreement are committed to maintaining confidentiality and receive the necessary training on personal data protection; 4. *Ensure the compliance of any other sub Processors*; 5. *Help the Controller* fulfil his obligations and respond to the requests of data subjects concerning the exercise of their rights; 6. *Notify any personal data breach to the Controller* not later than 48 hours after having become aware of it; 7. *Where required, help the Controller carry out an impact assessment* on personal data protection; 8. *Implement the following safety measures*: a. train the staff who is involved in data processing on behalf of the Controller, as referred to in point 2.; b. use and manage appropriate information technologies to protect their network and the server used; c. Prevent and protect archives and paper documents from unauthorised access, theft and destruction; 9. *After providing the services related to data processing, erase any data processed on behalf of the* Controller, unless otherwise provided for by legal requirements; 10. *Communicate the name and details of its Data Protection Officer*, "DPO", where appointed, *to the Controller*; 11. *Keep a written record of all categories of processing activities carried out* on behalf of the Controller; 12. *Make available to the Controller the documentation necessary to demonstrate compliance with all the obligations listed above.*

V.   **The Controller undertakes to**:
1. *Provide the Processor and Sub Processors with all the information necessary* to ensure the effective performance of their duties; 2 *Make sure that the Processors and Sub Processors comply with the obligations* provided for by the European Regulation and the applicable data protection regulations before and during the processing; *3. Supervise the processing of personal data,* including revisions and inspections by the Processor and Sub Processors.

Processor's details:

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DPO appointed by the Processor: Rita Amelia Grunspan, Ph. 071 205405

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