

September 28, 2022  
Circular No. SBP-DR-0071-2022

General Manager

Subject: Reporting Requirements related to the Data Protection Officer. Rule 1-2022 – Changes in Bank Particulars Report (AT05)

Dear General Manager:

We refer hereby to Rule 1-2022 dated 24 February 2022 “Whereby special guidelines for the protection of personal data processed by banks are established,” issued in accordance with the provisions of the banking regime and in compliance with the principles, rights and general aspects of personal data protection developed by Law 81 dated 26 March 2019 and Executive Decree 285 dated 28 May 2021.

For its part, Article 22 of said Rule indicates that banks must appoint a Data Protection Officer who will be responsible for effectively managing the functions assigned by the Personal Data Protection Regime. The banks must notify in advance to the Superintendency of Banks the appointment or replacement of the Data Protection officer.

Considering that banks will have an adaptation term of twelve (12) months from the signing of Rule 1-2022 and with the objective that entities can send the corresponding information of the Data Protection Officer, the Superintendency has deemed it advisable to add three (3) boxes/fields to the Bank Particulars Report (AT05), as follows:

Box/field	Description	Format	Validation
<b>(84) Data Protection Officer Name</b>	The full name of the Data Protection Officer.	60-character Varchar	Full and correct name according to the ID card
<b>(85) Data Protection Officer appointment date</b>	Appointment date of Data Protection officer of the bank.	YYYYMMDD	Appointment date according to the document that establishes it.
<b>(86) Data Protection Officer E-mail address</b>	The e-mail address of the Data Protection Officer.	60-character Varchar	No blank spaces allowed.

As of October 2022, the new boxes/fields of the Bank Particulars Report (AT05) will be available for banks to send to the Superintendency of Banks the information on the appointment of the Data Protection Officer. The periodicity for the submittal of AT05 will remain within the first ten (10) business days of the month following the month to be reported.

Gradually, to the extent that banks inform the Superintendency about the appointment of the Data Protection Officer, we require that they start reporting the information requested in the new AT05 structure from the month the bank hired the Data Protection Officer.

Additionally, the banks that have already informed the Superintendency of Banks about the appointment of the Data Protection officer can report these data in AT05 as of October 2022.

Should you have any question or doubt, please feel free to contact us through our e-mail address [soporte@superbancos.gob.pa](mailto:soporte@superbancos.gob.pa), referring to this circular and including the name, position, e-mail address, and telephone number of the person sending the enquiry.

We would appreciate your providing the necessary instructions to your staff for compliance with these provisions.

Best regards,

*Digitally signed by [S]*  
*NAME ARANGO COBOS,*  
*MICHELLE NATALIE – ID 8-786-350*  
*Date: 2022.09.28 10:41:28 - 05'00'*  
Michelle Arango  
Acting Superintendent

Enc.: Bank Particulars (AT05) Structure

ARV/adec