

PERSONAL DATA PROTECTION POLICY

1. Personal Data Protection Policy

Take your time and read this document carefully. Do not hesitate to ask us for clarification on anything you do not understand.

In this section, we explain what BBVA will use your details for and what rights you have in relation to their use.

BASIC INFORMATION ON DATA PROTECTION	
Data Controller	<p>Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"), with registered office at Plaza San Nicolás 4, 48005, Bilbao, Spain. Email address: consultasgenerales@bbva.com</p> <p>Further details in the Additional Information section</p>
Purposes	<p>If you are a BBVA customer:</p> <ol style="list-style-type: none"> 1. Manage the contractual relationship for the products and services you request or have taken out with BBVA. 2. Comply with legal obligations and regulations applicable to BBVA. 3. Inform and consult credit information systems. 4. Prevent fraud. 5. Analyze risks, profiles and commercial purposes: <ol style="list-style-type: none"> (i) Preparation of basic profiles. (ii) Preparation of advanced commercial and risk profiles. (iii) Offer products and services from BBVA, the BBVA Group, or its subsidiaries or partners, as well as products and services marketed by any of the former. 6. Data analysis. 7. Provide your details to the following subsidiaries and partners of the BBVA Group https://www.bbva.es/content/dam/public-web/bbvaes/documents/gdpr/datos-personales/sociedades-grupo.pdf so that they can offer you their own customized products and services. <p>Further details in the Additional Information section</p> <p>If you are a representative, guarantor, authorized user, payee, or spouse providing consent or non-debtor mortgagor, we will process your personal data at BBVA in order to manage the contract you intervene in pursuant to your legal relationship with a BBVA customer.</p> <p>Further details in the Additional Information section</p>
Rights	<p>Your data is yours and you control it. Therefore, you can access it, correct it, delete it and request other rights at any time, as explained in the Additional Information section.</p>
Additional information	<p>You can view additional and detailed information on BBVA Personal Data Protection in the Additional information section.</p>

If you are a BBVA customer, based on our legitimate interest, at BBVA we analyze your preferences to offer you the BBVA products and services, and others marketed by BBVA, that we think might be of interest to you in keeping with these preferences. Furthermore, if you so authorize us in the boxes below, we will be able to conduct a more detailed analysis, as well as send you offers for other



products and services that we think might be of interest to you.

[] I want BBVA to check and process my details and preferences more closely in order to offer me solutions that help me better manage my finances.

more info in Additional Information, in the section on Preparation of advanced commercial and risk profiles.

[] I want BBVA to communicate with me to offer me products and services from the companies of the BBVA Group and its subsidiaries and partners.

more info in Additional Information, in the section on Products and services from the BBVA Group companies and/or its subsidiaries and partners.

[] I want my details to be provided only to companies of the BBVA Group, its subsidiaries and partners, so they can personalize the products and services they offer me.

more info in Additional Information, in the section on Communicating your data to companies of the BBVA Group, its subsidiaries, and companies with whom we have partnership agreements, so that they can offer you their products and services.

You can change your selection and configure your settings at any time from the app, online banking, or through your adviser or your branch.

We remind you that you are not required to accept that your data be processed for these purposes. In this sense, if you do not mark the boxes, you do not consent to the processing, yet this will not affect the development any product or service contracts you hold with the Bank nor your compliance with them.

If you are a representative, guarantor, authorized user, beneficiary, or spouse providing consent or non-debtor mortgagor, you only have to sign on the last page of the document, since the processing of your data is necessary for the management of the contractual relationship in which you partake.

When you enter the password we ask you for during the signing process, you will be expressing your agreement with this Personal Data Protection Policy.

Finally, we remind you that this Personal Data Protection Policy may be updated and is subject to change. Therefore, we recommend that you review it every so often, without prejudice to any informative messages that BBVA may send out. You can access the latest version of this document at any time at the following link:

https://www.bbva.es/content/dam/public-web/bbvaes/documents/gdpr/datos-personales/politica-tratamiento-datos-personales_eng.pdf

Additional information

Keep reading to find out exactly how we process your personal data at BBVA.

Who is the data controller of your personal data?

Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"), tax ID A-48265169, with its registered office at Plaza de San Nicolás 4, 48005, Bilbao, Spain. Email address: consultasgenerales@bbva.com

How can you contact the BBVA Data Protection Officer?

You can contact the BBVA Data Protection Officer accediendo a la página web [bbva.es](https://www.bbva.es), apartado Datos Personales/Contacto DPO o a través del siguiente link: <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>.

What data do we process? How do we obtain your data?

■ If you are a customer

At BBVA we process the data shown below and the data that comes from information you have provided directly, information that we have collected or generated about you, and information that we have obtained from other sources. At BBVA, we process this data in relation to the products and services you have taken out with us and the products and services that BBVA markets.

- **Identity and contact data, such as:** first and last names, photograph, national ID (DNI), passport or NIE, nationality, country of birth, date of birth, postal addresses, email addresses, phone number, mobile phone number, and data related to voice and image.

- **Signature information:** handwritten, digitized, and online banking passwords.
- **ID codes or passwords** you use in your relationship with BBVA to log in and do your banking through the remote banking channels.
- **Economic and creditworthiness information, such as:** monthly net income, average balance in accounts, asset balance, direct debit bills, direct deposit of salary, income and expenses, assets and liabilities, as well as, where applicable, those related to your financial rating, financial situation and investment goals.

Similarly, when provided, BBVA will process data such as working life or your Personal Income Tax return which, if you consent to it, will be verified with the General Treasury of the Social Security or the Tax Agency, respectively. If you maintain a certain, overdue, and payable debt with BBVA, additional data may be obtained in order to manage its collection.

- **Transaction data,** such as: your account transactions, card transactions, balances, income, payments, transfers, debits, bills, and direct deposits and debits. They include the origin, destination, item, and third party concerning the transaction, as well as the location where the transaction is carried out and the date and time. In addition, the aforementioned data is that which is processed by BBVA in relation to the products and services that you have taken out with BBVA, as well as the products and services of the aggregated companies in the event that you have taken out the aggregation or payment initiation services.
- **Sociodemographic data,** such as: age, marital status, family situation, residence, education and occupation (contract type, job type, employer, time at the job), membership in groups as well as sustainability preferences, knowledge and experience in investments and their risks, level of studies and professional experience in the financial sector.
- **Data on the products and services you have with us,** such as: contract number, contract limits, types of products and services you have taken out, contract details (features associated with the contract), direct debit account, BBVA risk, intervening parties, as well as any documentation associated with any of these contracts.
- **Data included in the aggregation and payment initiation services:** in the event you have taken out these services, we process data on products and services open in the other aggregated entities and data on the other categories mentioned (e.g. signature information and transaction details, including, where applicable, the origin, destination, item, location, data, time, etc.) with regard to these services.
- **Communication data:** any data originating from telephone calls or exchanges you make with the Bank through any written or oral communication channel, such as email, instant messaging, social networks, or the conversation interfaces available to you at any time; commercial communication data, including their results; as well as the data you provide through satisfaction surveys.

Data collected or generated on you:

- Data on the use of the channels that BBVA makes available to you to manage your products and services: such as the device ID, device manufacturer and model, device operating system, IP address, browser and version, as well as browsing and access data.
- Information derived from products and services you have with us, such as: data on browsing and use of digital channels, data on how you interact with BBVA through the various channels, geolocation data, data obtained from your comments in messages or transactions, information included in your transaction data (e.g. receipts, transfers, debts), or data from your interactions with chatbots.

Data obtained from other sources:

- Solvency information from the Risk Information Center of the Bank of Spain (CIRBE).
- Information to analyze the financial suitability of your applications and operations, obtained from credit information systems (Asnef-Equifax Servicios de Información sobre Solvencia y Crédito S.L. and Experian Bureau de Crédito, S.A.) and credit rating companies such as Equifax Ibérica, S.L.
- Information from fraud prevention information systems, such as Confirma and Iberpay.

- Information from fraud risk indicator information systems, such as Emailage or Telesign.
- Publicly accessible sources such as official journals and gazettes, public records, Public Administration decisions, land registries, telephone directories, lists of persons belonging to professional bodies, and official lists for fraud prevention (Confirma and Experian).
- Information on the valuation of real estate, vehicles, or other movable assets from sources such as Madiva Soluciones, S.L., vehicle appraisals obtained from EUROTAX, or appraisals of any other assets used to assess solvency.
- Information on profiles obtained from utility companies (energy, communications, etc.).
- Data concerning the delivery of goods or services for which BBVA has provided financing, obtained from the suppliers of these goods or services.
- Digital behavior data obtained from media platforms and centers assigned to cookies or devices, when you consent to our website and mobile cookie policy.
- **If you are a representative or authorized user:**
 - Identification and contact data (including postal and/or email addresses).
 - Signature data (including digital and electronic signatures).
 - Sociodemographic data, such as: age, marital status, family situation, residences, studies, occupation (type of contract, employment seniority), or group memberships.
 - Identification codes and passwords you use in your relationship with BBVA to log in and manage your banking through the remote banking channels.
 - Details regarding representative status of other legal entities.
 - Data obtained from other sources: Information from fraud prevention information systems, such as Confirma; information from fraud risk indicator information systems, such as Emailage or Telesign.
 - Data on the products and services you take out.
 - Information on knowledge and experience, level of studies and professional experience in the financial sector.

In addition to those mentioned above, there may be additional processing of personal data if you have agreed to it with the Bank.

Please note that if you were also a BBVA private customer, BBVA may use your data derived from your contractual relationship with BBVA as a private customer in order to prevent fraud in the transactions in which you act as a representative or proxy.

- **If you are a payee:**
 - Identification and contact data (including postal and/or email addresses).
 - Signature data (including digital and electronic signatures).
 - Identification codes and passwords you use in your relationship with BBVA to log in and manage your banking through the remote banking channels.
 - Data on the products and services you take out.
 - Information on knowledge and experience, level of studies and professional experience in the financial sector.

In addition to those mentioned above, there may be additional processing of personal data if you have agreed to it with the Bank.

■ **If you are a Guarantor:**

- Identification and contact data (including postal and/or email addresses).
- Signature data (including digital and electronic signatures).
- Financial and solvency data.
- Sociodemographic data, such as: age, marital status, family situation, residences, studies, occupation (type of contract, employment seniority), or group memberships.
- Data obtained from other sources: Solvency information from the Risk Information Center of the Bank of Spain (CIRBE); Information obtained from credit information systems (Asnef-Equifax Servicios de Información sobre Solvencia y Crédito S.L. and Experian Bureau de Crédito, S.A.) and credit rating companies such as Equifax Ibérica, S.L.; and information from fraud prevention information systems, such as Confirma.
- Data from other products in which you participate as a guarantor.

■ **If you are a spouse that provides consent or a non-debtor mortgagor:**

- Identification and contact data (including postal and/or email addresses).
- Signature data (including digital and electronic signatures).
- Data on the products and services you take out.

At BBVA, we ask you to keep your data duly updated to ensure that the data we are processing is accurate, complete, exact, and updated at all times. If you modify the data, you must communicate this fact to us without delay to keep us up-to-date of your current situation.

For what purposes and why (legal basis) do we process your personal data?

A) IF YOU ARE A CUSTOMER

1. Manage the contractual relationship for the products or services you request from or have with BBVA

During the new customer registration process

BBVA processes your personal data to identify you and to manage your application to register as a new customer, and to help you during said process.

For registration processes with video-call or video-identification, you can consult the information involved in this processing here: <https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/videollamada-y-videoidentificacion.pdf>

When you are a customer for taking out any product or service

At BBVA, we process your personal data to:

- Properly manage the products and services you request from us or take out with us. This includes assessing your solvency and the development, maintenance, and monitoring of the pre-contractual and contractual relationship between you and BBVA.
- Respond to your queries and monitor our relationship with you and your financial progress (the products and services you have taken out with BBVA as a customer or those that BBVA markets).
- Send you non-commercial notifications to manage your relationship with BBVA resulting from the products and services you have taken out with us, as well as assess the opinion you wish to give on the services provided.
- To show you your financial information in a simple and intuitive way in the various channels that BBVA makes available

to you.

- Track, analyze, and process risk, non-payment, incidents, or claims as regards your status as a customer, including, in this last case, any processing involving their investigation and/or discovery so that we can take the necessary actions.
- Manage your access to the various channels made available to you by BBVA so that you can access and manage the products and services you have taken out with BBVA.
- Furthermore, when BBVA grants you financing for the purchase of a good or service, BBVA will inform the provider of the good or service of the corresponding financing operation (operation number, customer and amount) so that the provider can track and monitor the operations paid by the Bank for the purposes of its own internal billing. BBVA may also have to request information from the provider of the good or service concerning its delivery so that BBVA can execute the respective financing contract.

The **legal basis** that allows us to process your personal data is the **processing of the contract** for the products and services requested or that you have with BBVA.

Additionally, in certain cases, BBVA may, directly or through companies with which it contracts this service, obtain additional data and process it on the basis of its **legitimate interest** to recover the amount of the debt.

In addition, if you have taken out products from BBVA Seguros, S.A. de Seguros y Reaseguros, BBVA may share any updated information it may have concerning your personal data. In other words, if you update some personal information through BBVA, it may share it with BBVA Seguros, S.A. de Seguros y Reaseguros.

The legal basis for this processing is the legitimate interest of BBVA Seguros, S.A. de Seguros y Reaseguros to keep the contact details of its customers accurate and up-to-date at all times.

Iberpay account ownership verification service

We will also process your identification details and the account to confirm whether you are the holder of an account with BBVA at the request of a third party (hereinafter, the Applicant), with whom you have signed or are going to sign a contract that involves a payment on your part by direct debit or debit in that account.

The processing of your data in order for BBVA to verify the ownership of your account in which it intends to make a payment or collection immediately or in the future, has as its **legal basis** the contractual relationship you maintain with both the Applicant and BBVA and the purpose of this contract is to ensure that the parties comply correctly with the contract, so that you avoid damages resulting from an error in the direct debit payment account.

2. Comply with legal obligations and regulations applicable to BBVA

(i) Report to and consult with CIRBE

At BBVA, we are legally required to notify the Bank of Spain's Risk Information Center (CIRBE) of the risks involved in your banking transactions as a customer, together with your personal data and your status as an individual entrepreneur, if applicable. BBVA can consult any data relating to you in the CIRBE in order to manage your financing application and verify and assess your solvency and credit risk, if you hold financing products or services with the Bank.

The legal basis is the fulfillment of a legal obligation (Law 44/2002, of 22 November, on the Reform of the Financial System).

(ii) To prevent money laundering and terrorist financing

To prevent money laundering and terrorist financing, we are required to:

- Report to the Centralized Banking Account Register on a monthly basis regarding any checking accounts, savings accounts, securities accounts or term deposits that have been opened, closed, or modified, as well as any safe deposit box contracts and their duration, regardless of the business name. Therefore, your identification details will be added to that database, which is maintained by the State Secretariat for Economy and Business Support.
- To gather information about you and identify you to comply with the due diligence obligations imposed by this

regulation.

- Analyze the operations made in your account through BBVA and report them to Sepblac if appropriate.
- Provide information on transactions to the authorities of Spain and other countries, both within and outside the European Union, on the basis of legislation of some countries and agreements signed with them.

The legal basis is the fulfillment of a **legal obligation** (Law 10/2010 of April 28, on the Prevention of Money Laundering and the Financing of Terrorism, and Law 5/2015 on the promotion of corporate financing and its implementing regulations).

(iii) Creation of risk models

Spanish and European regulations (e.g. the European Central Bank, the European Banking Authority, or the Bank of Spain) require financial institutions to comply with standards and guidelines for the control of solvency, financial risk, and the calculation of Capital and Provisions required by each operation and customer in relation to the different phases of governing risk management: admission (risk/price/delegation), monitoring, collection, and recoveries. This regulation requires data processing when creating risk profiles and risk models in terms of their detail and historical depth.

The legal basis is the compliance with a **legal obligation** provided for in the regulations governing credit institutions, investment companies, and solvency and financial risk monitoring entities.

The analytical models used to prepare profiles may lead us to adopt automated decisions in order to comply with the aforementioned regulation. You can check the details of those decisions that may be made in this manner at the following link: <https://www.bbva.es/content/dam/public-web/bbvaes/documents/experiencias/agregador-financiero/tratamiento-comportamental-normativo.pdf>. You also have the right to have an operator intervene to explain the decision made, to take your comments on the matter, and to challenge the decision.

(iv) MiFID classification, suitability and convenience analysis to take out investment products

When required by the regulations, we will process the personal information and data that you provide us to assess your knowledge of and experience with a specific product and, when necessary, to define your investor profile. To do this, we will take into account, depending on the service provided, your knowledge and experience with specific financial instruments, your investment goals (including your tolerance level and sustainability preferences), as well as your financial situation, in order to determine whether the product or service is suitable for you.

The legal basis is compliance with a legal obligation (Act 6/2023 of 17 March, on the Securities Market and Investment Services and Delegated Regulation 217/565).

In the case of portfolio advisory and discretionary management services, this processing involves the creation of an investment risk profile that we use exclusively in order to provide you with the services indicated, as well as to monitor the suitability of the product you have taken out, in accordance with the obligations imposed on our activity by the Securities Markets and Investment Services Act.

You can check the details of those decisions that may be made in this manner at the following link: <https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/perfil-de-riesgo-de-inversion.pdf>. You also have the right to have an operator intervene to explain the decision made, to take your comments on the matter, and to challenge the decision.

3. Report to and consult credit reporting systems

To analyze the economic feasibility of your applications and operations, BBVA needs to consult the data held under your name in credit information systems by the following entities: Asnef-Equifax Servicios de Información sobre Solvencia y Crédito S.L. (ASNEF) and Experian Bureau de Crédito, S.A. (EXPERIAN).

Please be notified that we may communicate the details of your debts to credit record companies when:

- There is a specific, overdue, and payable debt, the existence or amount of which you would not have appealed administratively, legally, or through arbitration.
- Less than 5 years have passed since the date on which the debt should have been settled, or on which the liability or specific repayment installment fell due.

The legal basis for any communication with credit reporting systems, as well as for inquiries for applications involving

consumer credit, is BBVA's legitimate interest to comply with the responsible credit criteria.

The legal basis for inquiries involving applications for real estate loans pursuant to Law 5/2019 of March 15, which regulates real estate credit contracts, is to satisfy a legal obligation.

4. Fraud prevention

We will use your personal data to prevent situations of fraud when using our products and services, as well as to prevent situations in which you may be harmed as a result of the fraudulent activity of third parties.

For this purpose, we will also process your personal data to send you communications containing general information on fraud operations for your knowledge.

The legal basis is BBVA's **legitimate interest** to prevent these situations from occurring, with the consequent harm to you and, where applicable, to the bank itself. You can exercise your right to object by sending an email to: derechosprotecciondatos@bbva.com, or by requesting it at any of our branches.

In addition, to fulfill this purpose, we may report to and consult the data that appears in the following information systems:

(i) Confirma system

In order to prevent and avoid possible attempts at fraud, BBVA is a member of the Confirma File. The personal data you provide to BBVA as part of a transaction request (for example, for a current account opening or financing application) will be communicated to the Confirma database for the purpose of collating requests and transactions registered in the system to assess the likelihood of fraud for the associated institutions.

The data controllers are the companies who have signed on to the Confirma System Regulations, whose data processor is Confirma Sistemas de Información, S.L. with registered address at Avda. de la Industria, 18, TRES CANTOS (28760) MADRID. You can consult the list of Companies that are currently signed on to the Confirma System Regulations on the website www.confirmasistemas.es. The companies that adhere to its Regulations and that may be subject to fraud in the contracting process may participate in the Confirma database. The data communicated to the Confirma database may be viewed by the other companies who are part of the Confirma System Regulations. You can request additional information, and check the essential aspects of the joint controller agreement between the member companies by heading to bbva.es, Personal Details / Contact DPO or via the following link: <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>.

The legal basis is legitimate interest of the members of the Confirm System in preventing fraud to reduce identity theft and document tampering, thus protecting customers and minimizing their financial loss, in the interest of society as a whole. Curtailing the ability to carry out fraudulent operations means a reduction, in general terms, of subsequent crime and the implications for other crimes such as money laundering or the financing of terrorism. This System is clearly in your interest, as it is intended to protect you from the fraudulent practices of third parties that may affect you specifically.

Consulting the Confirma System is advisable given the purpose pursued and proportionate to the benefit obtained by the member entities and the impact on your privacy. Similarly, the data processing is framed within your reasonable expectation as it is common practice and occurs as part of a transaction request. To avoid damage and negative consequences for you, technical and organisational measures have been taken to strengthen the confidentiality and security of your information. The personal data may be stored for up to five years. Your personal data will not be transferred to a third country or international organization.

Under data protection regulations in force, you will be able to exercise your rights of access, rectification, erasure, opposition, restricted processing and portability, by contacting the office of the data processor, Confirma Sistemas de información, S.L., at the address indicated above. You may also exercise your right to file a claim with the Spanish Data Protection Agency (www.aepd.es) Confirma Sistemas de Información, S.L. has assigned a Data Protection Officer who you can contact by email at dpo@confirmasistemas.es for privacy requests relating to the Confirma System. If you do not agree, you can object by sending an email to: dpo@confirmasistemas.es.

(ii) Iberpay system

Be informed that your personal data may be included by BBVA in a common system for preventing fraud in banking operations, the joint controllers of which are the entities associated with this system, including BBVA. You can consult the updated list of the companies associated with this common system at the following link: <https://www.iberpay.com/es/servicios/sectoriales/prevencion-del-fraude/>. You can request additional information, and check the essential aspects of the joint controller agreement between the member companies by heading to bbva.es, Personal Details / Contact DPO or via the following link: <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>.

This common system is managed by Sociedad Española de Sistemas de Pago S.A. (Iberpay) and its purpose is to identify, investigate, track and potentially report payment transactions in your checking or savings account that are unauthorized or suspected of being fraudulent.

The details included by BBVA in the aforementioned common system will be those relating to the IBAN number and the account holder where the transaction that is unauthorized or suspected of being fraudulent was detected. The system may be consulted by financial institutions associated with this common system for the sole purpose of identifying, preventing and tracking fraud.

The legal basis for processing your data is the legitimate interest of this financial institution to identify and prevent fraud in banking operations that in any way involve your checking or savings account. Similarly, the processing described is carried out in the interest of the account holders themselves who may be affected by fraud committed by third parties.

The data will be stored in the system for a maximum of thirty days in the event of suspicious transactions, and for one year in the case of unauthorized transactions (when the fraud has been confirmed by the affected party). BBVA will automatically delete the data included in the common system when it is no longer accurate or does not accurately reflect the actual situation of the affected person.

Finally, we remind you that you may exercise your rights of access, correction, deletion, objection, limitation of processing, and portability involving your data by writing to the following email address: derechosprotecciondatos@bbva.com or, if you prefer, by sending a letter to Servicio Atención al Cliente Grupo BBVA, APDO: 1598-28080 Madrid, specifying which right you wish to exercise.

If you think we have failed to process your personal data in accordance with the regulations, you may contact BBVA's Data Protection Officer through the website www.bbva.es, section Personal Data/DPO contact details, or via the following link. <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>. In any case, you have the right to file a claim with the Spanish Data Protection Agency (www.aepd.es).

(iii) Functionality to prevent fraud in EU cross-border payments

When issuing a cross-border transfer between banks located within the EU, we inform you that personal data, namely the IBAN number of his/her destination account and the name of the beneficiary of the transfer, may also be processed to identify anomalies and fraud patterns involving European payment systems.

The purpose of this processing is to identify anomalous or irregular operations, and to detect risk behaviors and patterns that can be used to identify them.

The legal basis for processing the aforementioned data is the legitimate interest of BBVA to identify and prevent fraud in banking operations that involve your account. Similarly, the processing described is carried out in the interest of the account holders themselves, who may be affected by fraud committed by third parties.

The processing involved in detecting anomalies and fraud patterns will be as follows:

- With regard to fraud prevention, the processing allows the Bank to analyze in real time the risks associated with accounts and payments, using tools that validate account and transaction data based on previously identified historical patterns, and to detect potential anomalies and indicators that help manage the risks of fraud before sending a payment or as part of account confirmation activities.
- With regard to fraud detection, the processing allows the Bank to conduct analyses after the transaction to help investigate and identify high-risk transactions once the payments are made.
- Finally, the processing allows the Bank to analyze data in order to identify new risk patterns and payment anomalies, so it can improve the prevention and detection processes.

The Bank will not transfer the data collected as a result of this processing to any third party other than the counterparty in the transfers, and it will proceed to delete it when it is no longer needed for the purpose for which it was collected and, in any case, within 14 months from the date it was collected.

Finally, we remind you that you may exercise your rights of access, correction, deletion, objection, limitation of processing, and portability involving your data by writing to the following email address: derechosprotecciondatos@bbva.com or, if you prefer, by sending a letter to Servicio Atención al Cliente Grupo BBVA, APDO: 1598-28080 Madrid, specifying which right you wish to exercise.

If you think we have failed to process your personal data in accordance with the regulations, you may contact BBVA's Data Protection Officer through the website www.bbva.es, section Personal Data/DPO contact details, or via the following link.

<https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo> at the address dpogrupobbva@bbva.com. In any case, you have the right to file a claim with the Spanish Data Protection Agency (www.aepd.es).

(iv) Emailage and Telesign

In order to assess the risk of fraud, we need to send certain personal data to the companies Emailage Corporation ("Emailage"), with registered address at 16 Great Queen Street, Covent Garden, London (United Kingdom) and Telesign Corporation ("Telesign"), with registered address at 13274 Fiji Way Suite 600, Marina Del Rey, CA 90292 (United States), which provide services to BBVA to verify the mobile phone number, email address and IP address you provide in an asset request.

The personal data that will be sent will be the email and IP address, in the case of Emailage, and the contact phone number, in the case of Telesign, in order for these entities to identify potentially fraudulent data.

The legal basis for sending your personal data to Emailage and Telesign is BBVA's legitimate interest in detecting any actions in which there may be anomalies that could suggest irregular or fraudulent behavior and preventing fraudulent situations that could cause harm to the interested parties and BBVA.

If you do not agree, you can object by sending an email to: derechosprotecciondatos@bbva.com

5. Risk analysis and commercial purposes

(i) Preparation of basic profiles

a) Preparation of basic commercial profiles

For the creation of basic commercial profiles, we will analyze your preferences using the data from your relationship with BBVA, such as identification and contact details, sociodemographic data, financial and solvency data, transactional data, basic data on Aggregation and Payment Initiation Services when you opt in when signing up for the service, communication data, data on products and services you have taken out with BBVA or those marketed by BBVA, data on the use of the service channels made available by BBVA, including browsing information and digital behavior data obtained from platforms and media centers assigned to cookies or devices that we collect when you consent to our cookie policy on the website and mobile, and to geolocation on your mobile device when you consent through said device. Likewise, we use data obtained from public sources, sources providing real estate valuations, such as Madiva Soluciones, S.L., vehicle appraisals obtained from EUROTAX, and statistical sources.

The data we process will be that **corresponding to the previous year.**

b) Preparation of a basic profile for risk purposes

In order to draw up your basic risk profile, we will assess your solvency and, depending on your creditworthiness, we will assign you a maximum financing limit or overdraft for products such as checking accounts, cards, loans, or credits that may be of interest to you. We would perform this assessment on the Bank's own initiative, without your having requested it, and using information from our own sources or third-party sources that are publicly available or mandatory, in accordance with the regulations for assessing solvency, such as credit information systems (Risk Information Center of the Bank of Spain (CIRBE), Asnef-Equifax Servicios de Información sobre Solvencia y Crédito S.L., Experian Bureau de Crédito, S.A., and credit assessment companies like Equifax Ibérica, S.L.); fraud prevention information systems, such as Confirma; sources providing real estate valuations, such as Madiva Soluciones, S.L., vehicle appraisals obtained from EUROTAX; and statistical sources.

For this purpose, we use data such as: identification and contact details, financial and solvency data, transactional data, sociodemographic data, data on products and services, data included in the Aggregation and Payment Initiation Services, communications data, data on the use of the channels made available by BBVA to manage your products and services, information derived from the products and services you have taken out, data on the use of digital channels, including browsing information and digital behavior data obtained from platforms and media centers assigned to cookies or devices that we collect when you consent to our web and mobile cookie policy and the use of geolocation data of your mobile device when you consent to it on the device itself.

The data we process will be that **corresponding to the last five years.**

In some cases, the data may be processed using mathematical algorithms (automatic processing) to ensure that the approved financing or the product or service offered is best suited to your personal situation at the time.

You can check the types of decisions that could be made in this manner at <https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/decisiones-automatizadas-ii.pdf>, which contains the relevant information. You also have the right to have an operator intervene to explain the decision made, to take your comments on the matter, and to challenge the decision.

c) Carbon footprint calculation

We will analyze your CO2 emissions to calculate the carbon footprint you generate with your activity from your use of electricity and fuel. We will do so by using details from your transactions with BBVA, specifically from those transactions made with cards, as well as from direct debited bills you have in the BBVA accounts that are in your name, provided that these transactions have been previously categorized as involving electricity, gas and transport. Similarly, we use the details on the issuer of the bill in order to know the CO2 emission factor that has to be applied to generate this carbon footprint.

The carbon footprint is calculated using data that is generated **daily** or, at the most, in the **three previous days**.

By analyzing these profiles as described in sections a) and b), we can offer you suggestions to help you manage your finances and recommendations on the products and services that are best suited to your profile; and with the profile described in section c) we can show you the level of CO2 emissions that you generate, so that, by knowing your carbon footprint, you can reduce it.

The legal basis for the processing indicated in the previous sections is the legitimate interest of BBVA in (i) better knowing its customers and creating a wider and improved range of products and services; and (ii) adjust its products/services to the needs of customers. We consider this processing to be beneficial to you; in its analysis, we have taken into consideration your rights and freedoms and, in particular, respect for your fundamental right to the protection of personal data; and (iii) collaborate with citizens to improve their ecological efficiency by raising awareness among customers regarding the environmental impact of their daily activities.

You can exercise your right to object by sending an email to derechosprotecciondatos@bbva.com, requesting so at any of our branches, or through the app in the "Carbon Footprint" section. You can also modify the objection exercised via the email address indicated above.

(ii) Preparation of advanced commercial and risk profiles

a) Preparation of advanced commercial profile If you give us your consent, we will process your personal data to prepare your commercial profile in more detail than laid out in section (i) above. **We may process your personal data from a period not to exceed the last (5 years). This processing thus yields highly detailed knowledge of your preferences as a customer as a result of using more of your personal data.**

To draw up your advanced commercial profile, we apply analytical models that allow us to gain a deeper understanding of your preferences, your payment ability or your financial solvency. To do this, in addition to the data analyzed in the basic commercial profile, we use data such as: transactional data (including texts by inference of the details of account and card transactions and other transactions such as origin, destination, purpose and third party related thereto) and details from the Aggregation and Payment Initiation Services, when you opt in when you sign up for these services. We also use data from public sources, data involving the delivery of goods or services for which BBVA has provided financing, obtained from the suppliers of these goods or services.

b) Preparation of advanced risk profile

If you give us your consent, we will process your personal data to prepare a broader risk profile in more depth than laid out in the section above. **The personal data we will process may correspond to the validity period of the products you have with us, which is why this processing entails very detailed knowledge of your preferences as a customer as a result of using more of your personal data.**

To draw up your advanced risk profile, we will analyze your saving and debt capacity and your financial history. To do this, in addition to the data analyzed in the basic risk profile, we use data such as: transactional (including texts of bills by inference from the details of account and card transactions, such as origin, destination, purpose and third party related to the transaction), including data from the Aggregation and Payment Initiation Services, when you consent when you sign up for these services, from communications, data on how you use the Bank's channels, data you provide through satisfaction surveys, including the information we collect from your browsing and use of digital channels when you consent to our website and mobile cookie policy, details of your location (geolocation of your mobile device) when you consent to it through the device, and data obtained from other sources, in addition to those indicated in the basic risk profile, such as:

- Publicly-accessible sources such as official journals and bulletins, public registers, lists of members of professional associations and Chambers of Commerce.
- Information on profiles obtained from utility companies (energy, communications, etc.).

By applying these models, we can make suggestions for you to manage your finances, recommend offers for products and services that best suit your profile, and/or apply better conditions to the products and services you have with us or that you may apply for in the future. Similarly, by applying these models, we will be able to anticipate your needs and offer you, where applicable, products and/or services adjusted to your profile before you even request them.

In addition, the Bank may, depending on your credit rating and solvency, offer you a maximum funding limit or some other product that is of interest to you. Said product will be subject to your acceptance of the offer and other specific conditions that we will inform you of as appropriate, such as consulting your financial positions in credit information systems.

In some cases, the analytical models used to prepare profiles may lead us to adopt automated decisions in order to ensure that the product or service is offered at the right time and suited to your personal situation. You can check the types of decisions that could be made in this manner at <https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/decisiones-automatizadas-ii.pdf>, which contains the relevant information. You also have the right to have an operator intervene to explain the decision made, to take your comments on the matter, and to challenge the decision.

The **legal basis** is your **consent**.

These profiles will not be used for any other purpose and are designed to offer you the best products and services adapted to your personal profile at all times. Special data categories are never used to prepare these profiles. For your information, you can decide whether or not to consent to the processing explained in this section (ii) by checking the corresponding box in the **Basic Data Protection Information** "I want BBVA to check and process my data and preferences in more detail in order to offer me solutions that can help me better manage my finances."

(iii) Offer you products and services

a) Range of products and services from BBVA or marketed by it

Based on the basic profile described in section (i) above and, if you consent to the advanced profile described in section (ii), we can send you commercial communications on BBVA products and services, or those marketed by BBVA, in the financial and insurance field.

We can send you commercial communications on BBVA products and services similar to those you have taken out directly with the Bank, or those marketed by it, or we can offer you better conditions and/or more suitable prices for the products and services you have taken out or may take out in the future.

As regards similar products, you may receive commercial communications for BBVA financial products or services or those marketed by BBVA on behalf of companies with whom it has agreements, such as investment funds, pension plans, including some insurance policies distributed by BBVA Mediación Operador de Banca Seguros Vinculado. You can view these products and services here: <https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/listado-productos-y-servicios.pdf>.

Likewise, if you have been a BBVA customer, you may continue receiving general commercial information on BBVA products and services, similar to those you previously had.

The legal basis for this processing is BBVA's legitimate interest to (i) promote its own products and services and those it markets, and (ii) offer responsible credit, minimize the risk of non-payment and, simultaneously, support your economic needs to provide you with a loan more quickly, easily, and flexibly. We consider this processing to be beneficial for you; in its analysis, we have taken into consideration your rights and freedoms and, in particular, respect for your fundamental right to the protection of personal data. If we send you commercial communications by electronic means (such as email, SMS or instant messaging applications), the legal basis is the exception to the consent laid out in the regulation on information society services.

You can exercise your right to object by sending an email to: derechosprotecciondatos@bbva.com, or by requesting it at any of our branches. You can also modify the objection exercised via the email address indicated above.

b) Offer you products and services from BBVA Group companies or from subsidiaries or partners

Based on the profiles described in sections (i) and (ii) above, if you gave your consent for the second one, we can contact you and send you information on products, services and offers from the companies of the BBVA Group, its subsidiaries and companies we have partnership agreements with, in these sectors of activity: financial, para banking, insurance, travel, automotive, telecommunications, utilities, security, IT, education, real estate, consumer products, leisure and free time, professional services and social services.

The **legal basis** is your **consent** to receive advertising material on the products and services of the BBVA Group and third parties. For your information, you can decide whether or not to consent to the processing explained in this section by checking the corresponding box in the **Basic data protection information** "I want BBVA to communicate with me to offer me products and services of the BBVA Group, its subsidiaries and partner companies".

You can view them at: <https://www.bbva.es/content/dam/public-web/bbvaes/documents/gdpr/datos-personales/sociedades-productos-terceros.pdf>

6. Data analysis

At BBVA, we analyze the information about our customers that is generated when you apply for the products you have with us, as well as from your interactions with the Bank, for the following purposes:

1. Refine our internal processes.
2. Improve and develop new products and services.
3. Gather statistics, conduct surveys, perform actuarial calculations, surveys and/or market studies that may be of interest to BBVA or third parties.
4. Conduct macro and microeconomic analyses, generate economic indicators, and obtain aggregated economic information for our own benefit and that of third parties.
5. Improve the tools available to combat fraud and money laundering.
6. Calculate your ability to pay for pre-approval.
7. Commercial purposes, solvency analysis, advice, scoring or propensity models, customer segmentation, estimates, recommendations, pricing models.
8. Business monitoring and generation of reports for decision-making support.

To carry out the above purposes, at BBVA we will sometimes create and use tools such as analytical and statistical models, which are created and supplied with the information described in the section **What data do we process?**

Whenever possible, BBVA replaces the identification and contact details (identified in the previous section on "data categories of data") with a code, always maintaining the correspondence list between each code and the customer to whom it corresponds independently and securely. This is known as pseudonymized data, and it preserves the identity of the data holder.

Similarly, whenever possible, personal data will be subject to anonymization, tokenization and aggregation processes to dissociate the information of any specific individual. We use technical measures in order to protect the identity of our customers and provide guarantees in the event of security breaches, so that identification is prevented.

The legal basis is BBVA's **legitimate interest** to (i) continuously improve the quality and functionality of the services we offer and of our operations, as well as to make a wider and improved range of products and services available to you; (ii) exploit large volumes of anonymized information while respecting the privacy of customers, in order to have aggregated economic information to exploit both internally and externally.

We believe this processing to be beneficial to you, and when analyzing it, we have taken into account your rights and freedoms and, in particular, respect for your fundamental right to the protection of personal data.

If you do not agree, you can object by sending an email to: derechosprotecciondatos@bbva.com, or by requesting it at any of our branches.

7. Provide your data to BBVA Group companies, subsidiaries or companies with which we have a partnership agreement so they can offer you their own products and services

If you give us your consent, BBVA will provide your identifying, contact, sociodemographic, economic and transactional information, as well as information on the products and services you have, to the companies of the BBVA Group, its subsidiaries and companies we have partnership agreements with, in these sectors of activity: financial, para banking, insurance, travel, automotive, telecommunications, utilities, security, IT, education, real estate, consumer products, leisure and free time, professional services and social services, which can be viewed at <https://www.bbva.es/content/dam/public-web/bbvaes/documents/gdpr/datos-personales/sociedades-grupo.pdf>, for the following purposes:

- a) Offer you products and services, including by electronic means, with personalized features and prices, in anticipation of your needs and whenever you request it.
- b) Prepare personal profiles to offer you a price tailored to you for the products and services you have taken out.
- c) Prepare statistics and analytical studies involving said data for actuarial, promotional, and commercial purposes.

The legal basis is your consent allowing us to provide your personal data to the companies of the BBVA Group, its subsidiaries, and the companies with whom BBVA has partnership agreements, so that they can send you advertising material for their products and services. For your information, you can decide whether or not to consent to the processing explained in this section by checking the corresponding box in the **Basic data protection information** "I want my details to be provided only to companies of the BBVA Group, its subsidiaries and partner companies so they can personalize the products and services they offer me".

B) OTHER TYPES OF PARTICIPATION

If you are a guarantor

1. Manage the processing of the products and services you have with us, in particular:

- Manage the guarantee you provided in favor of BBVA.
- Manage our relationship with you.
- Send you non-commercial notifications to manage your relationship with BBVA.
- Monitor, analyze and manage situations of risk, non-payments, incidents or claims.
- Manage your access to the various channels made available to you by BBVA so that you can access and manage the products and services you have with us.

The legal basis is the **contractual execution** or the **adoption of pre-contractual measures**.

2. To comply with legal obligations and with regulations applicable to BBVA, in particular:

- Inform and consult CIRBE.
- Prevent money laundering and terrorist financing (the obligation to report to the Centralized Banking Account Register does not apply to this type of involvement).
- Creation of risk models.

The legal basis for compliance with a **legal obligation**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 2. "To comply with legal obligations and regulations applicable to BBVA".

3. Inform and consult credit reporting systems

The legal basis for any communication with credit reporting systems, as well as for inquiries for applications involving consumer credit, is BBVA's **legitimate interest** to comply with the responsible credit criteria. The legal basis for inquiries involving applications for real estate loans pursuant to Law 5/2019 of March 15, which regulates real estate credit contracts, is to satisfy a **legal obligation**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 3. "Inform and Consult credit information systems".

4. Prevent fraud, report to and consult the Confirma Database.

The legal basis is a **legitimate interest**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 4. "Prevent fraud", which will be applied in full, except for the sending of communications relating to general information on fraud operations.

If you are a representative or proxy¹. Manage the processing of the products and services you have with us, in particular:

- Manage the contract of which you are a party as a representative or proxy because of your legal link to one of BBVA's clients, under the powers, competencies or instructions you receive from said client to arrange products, services or transactions.
- Send you non-commercial notifications to manage your relationship with BBVA or the relationship of the client you represent.
- Manage your access to the various channels made available to you by BBVA so that you can access and manage the products and services in your legal capacity as a customer of BBVA.

The legal basis is the **contractual execution** or the **adoption of pre-contractual measures**.

If you are the representative of a legal entity, the legal basis is BBVA's legitimate interest to maintain commercial and contractual relations with the entity you represent, in accordance with the provisions of Article 19 of Organic Law 3/2018 of 5 December, on Personal Data Protection and the guarantee of digital rights.

2. To comply with legal obligations and with regulations applicable to BBVA, in particular:

- Anti-money laundering and counterterrorist financing.

The basis for compliance with a **legal obligation**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 2. "To comply with legal obligations and regulations applicable to BBVA".

3. Prevent fraud, report to and consult the Confirma Database.

The legal basis is a **legitimate interest**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 4. "Prevent fraud", which will be applied in full, except for the sending of communications relating to general information on fraud operations.

If you are a payee

1. Manage the processing of the products and services you have with us, in particular:

- Manage the contract in which you are intervening in your capacity as payee due to your legal relationship with a BBVA customer.
- Send you non-commercial notifications to manage your relationship with BBVA.
- Manage your access to the various channels made available to you by BBVA so that you can access and manage the products and services you have taken out with BBVA.

The legal basis is the **contractual execution** or the **adoption of pre-contractual measures**.

2. To comply with legal obligations and with regulations applicable to BBVA, in particular:

- Prevent money laundering and terrorist financing (the obligation to report to the Centralized Banking Account Register does not apply to this type of involvement).

The basis for compliance with a **legal obligation**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 2. "To comply with legal obligations and regulations applicable to BBVA".

If you are a spouse that provides consent or a non-debtor mortgagor:

1. Manage the processing of the products and services you have with us, in particular:

- Manage the maintenance, compliance, development, control and execution of the provisions of the contracts you have signed.
- Send you non-commercial notifications to manage your relationship with BBVA.

The legal basis is the **contractual execution** or the **adoption of pre-contractual measures**.

2. To comply with legal obligations and with regulations applicable to BBVA, in particular:

- Prevent money laundering and terrorist financing (the obligation to report to the Centralized Banking Account Register does not apply to this type of involvement).

The basis for compliance with a **legal obligation**.

For more information, please consult the content of this processing in section "A) If you are a Customer" included in section 2. "To comply with legal obligations and regulations applicable to BBVA".

How long will we keep your data for?

We will keep your personal data on file for the duration of the contractual relationship or for as long as necessary for the specific purpose of each processing. After that, we will continue to block the data necessary for:

- i) comply with legal obligations; specifically:
 - a. 10 years pursuant to the law to prevent money laundering and terrorist financing.
 - b. During the maximum period of time established by the regulation to which financial institutions are subject regarding the calculation of capital and provisions (European Central Bank, European Banking Authority, and Bank of Spain).
- ii) and during the legal limitation periods for the exclusive purposes of processing claims or legal actions.

Once these periods end, we will destroy your personal data.

Who will we disclose your data to?

(i) Communications to third parties based on legitimate interest, law or to manage a contractual relationship for purposes set forth in other sections of the Personal Data Protection Policy

As we have indicated previously, BBVA may communicate the following data to the following entities:

- we communicate risk operations, in compliance with our legal obligations, to the Risk Information Center of the Bank of Spain (CIRBE) (if you are a customer or guarantor);
- we communicate identification details and certain contracted products to the Centralized Banking Account Register of the State Secretariat for Economic Affairs and Business Support in compliance with the regulations for the prevention of money laundering and financing of terrorism (if you are a customer, representative or authorized user);
- to national and European Union supervisory authorities, such as, among others, the Bank of Spain, the European Central Bank, the European Banking Authority (EBA) and Spain's National Securities Market Commission, when we are required to do so pursuant to a legal obligation.
- to national and foreign authorities inside and outside the European Union, in compliance with the regulations for the prevention of money laundering and financing of terrorism; to fraud prevention authorities;
- to BBVA Group companies to comply with their internal regulations on financial crime prevention, their legal obligations to prevent money laundering and regulatory reporting to the supervisory authorities.
- we communicate the debts that meet the respective requirements to entities that manage the credit information systems, based on compliance with the regulations (if you are a customer or guarantor);
- to the Confirma and Iberpay fraud prevention systems (if you are a customer or guarantor for the purposes of the Confirma system);
- to third parties who have IT tools designed to identify the prevalent risk of fraud based on certain information, such as Emailage or Telesign. In the case of Telesign, the communication will involve an international data transfer to the United States, with respect to which similar guarantees have been adopted as indicated in section (iv) "Service Providers";
- to the petitioner of an account ownership verification, through the Iberpay service, with which you have signed or are going to sign a contract that involves a payment on your part by direct deposit or debit in your account, based on the contractual relationship you have both with the requesting entity and BBVA.
- to Judges, Courts, Tax Ministry and/or the relevant government agencies, we provide the necessary information in the event of possible complaints when we are required to do so in compliance with the law.
- when BBVA grants you financing for the purchase of a good or service, BBVA will inform the provider of the good or service of the corresponding financing operation (operation number, customer and amount) so that the provider can track and monitor the operations paid by the Bank for the purposes of its own internal billing.
- we notify BBVA Seguros, S.A. de Seguros y Reaseguros of any updates to your personal data when you are also a customer of this company.

(ii) Communications to third parties based on consent included in purpose 7 of the Personal Data Protection Policy

If you consent to this, we may provide your identification, contact, socio-demographic, economic and transactional data and the products and services contracted to the companies of the BBVA Group, and to subsidiaries and/or other companies with which BBVA has collaboration agreements, included at this address

<https://www.bbva.es/content/dam/public-web/bbvaes/documents/gdpr/datos-personales/sociedades-grupo.pdf>

(iii) Communications to third parties within the framework of BBVA operations

BBVA may provide your personal data to third parties, potential purchasers or interested parties, in those cases where it is necessary to carry out (i) sales operations of assets, debt or liabilities, as well as sales of loan portfolios, credits or other type of financing (all with or without mortgage or other guarantees) and (ii) commercial structural modification operations (including mergers, demergers or divisions), contributions of assets or liabilities and/or sales or contributions of branches of activity, production units or business, as well as the sales or contributions of companies or other entities (including sales of shares, company shares, etc.), provided that this communication is necessary for the successful completion of the operation.

In these cases, we will sign agreements with these third parties or potential purchasers or interested parties, which require them to (i) process your data confidentially and exclusively for the aforementioned purpose and (ii) delete your data immediately if the operation in question is not formalized.

The legal basis for communicating your data is the legitimate interest of BBVA and these third parties or potential buyers or interested parties in the successful completion of the operation. The purpose of the communication is to allow them to access and review the information necessary for these purposes.

(iv) Service providers

In order to offer you a proper service and manage our relationship with you as a customer, at <https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/proveedores.pdf>, you will find a categorized listing of the companies that process your data on behalf of BBVA as part of the services they have been engaged to provide.

We also wish to point out that, for the same purpose as that mentioned in the previous paragraph, certain companies that provide services to BBVA and that are located outside the European Union may access your personal data (international data transfers). These transfers are made: (i) to countries with a level of protection equivalent to that of the European Union (suitability decisions issued by the European Commission); (ii) through standard contractual clauses; (iii) or on the basis of other appropriate guarantees provided for by law.

In any case, BBVA enters into contracts with service providers that guarantee data processing in accordance with BBVA's instructions and in full compliance with the applicable data protection regulations.

For more information, contact BBVA's Data Protection Officer through the website www.bbva.es, section Personal Data/DPO contact details, or via the following link.

<https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>

What are your rights when you submit data to us?

RIGHT	CONTENT
Access	You can view your personal data included in BBVA files.
Rectification	You can amend your personal data if it is inaccurate.
Erasure	You can request for your personal data to be erased.
Objection	You can request: - That your personal data not be processed, and/or - Not to be subject to automated decisions.

Processing limitation	<p>You can request that processing of your data be restricted under the following circumstances:</p> <ul style="list-style-type: none"> ■ While challenges as to the accuracy of your data are being checked. ■ When the processing of your data is unlawful, but you object to it being erased. ■ If BBVA does not need to process your data, but you need it in order to file or defend claims. ■ If you have objected to your data being processed in order to comply with an undertaking in the public interest or to fulfill a legitimate interest, while it is considered if the legal grounds for processing the data prevail over the ones you cite.
Portability	You may receive, in electronic format, the personal data you have provided and any data that has been obtained due to your contractual relationship with BBVA and transfer it to another entity.
Not to be subject to decisions based solely on automated processing	Whenever BBVA carries out automated processing without human intervention, you also have the right to request an operator to explain the decision made, to take your comments on the matter, and to challenge the Bank on the decision.

SERVICE CHANNELS

derechosprotecciondatos@bbva.com	BBVA Group Customer Services Department, APDO: 1598 - 28080 Madrid	BBVA Branches
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If you think we have failed to process your personal data in accordance with the regulations, you may contact the Data Protection Officer through the website www.bbva.es, section Personal Data/DPO contact details, or via the following link <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>.

You may also file a claim with the Spanish Data Protection Agency (www.aepd.es).

Exercising these rights is free.

Similarly, if you are a BBVA customer, you may withdraw any consent given, without this affecting the legality of the processing, as well as configure your options and consents from your online banking profile or on the BBVA app, by sending a request by email to derechosprotecciondatos@bbva.com, by postal mail to the Servicio Atención al Cliente Grupo BBVA, APDO: 1598 - 28080 Madrid, or by visiting one of our branches.