

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 data for and what rights you have in relation to its use.

BASIC INFORMATION ON DATA PROTECTION	
Data Controller	Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"), with registered office at Plaza San Nicolás 4, 48005 Bilbao, Spain. Email address: consultasgenerales@bbva.com . Further details in the Additional Information section
Purposes	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. Further details in the Additional Information section
Rights	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 .
Additional information	You can view additional and detailed information on BBVA Personal Data Protection in the Additional Information section .

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/legal/tratamiento-de-datos/LOPD-sin-DAE.pdf>

Additional information

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

Who is the data controller?

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.

Contacting the BBVA Data Protection Officer

You may contact the BBVA Data Protection Officer through the website www.bbva.es, section Personal Data/DPO contact, or via the following 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 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 co-signer.

- **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.

- **If you are a representative or proxy:**

- 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.
- Data on the products and services you take out.
- 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.
- 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.

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

A) 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 and your financial performance.
- 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 taken out with BBVA.

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. 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:

- Gather information about you and identify you to comply with the due diligence obligations imposed by this regulation.
- Analyze transactions completed 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) Beneficiary Verification Service for SEPA transfers

The entities participating in a SEPA transfer may process the beneficiary's data (name, surname, ID) and their account number (IBAN) for the purpose of verifying that the beneficiary designated by the originator is indeed the holder of the destination account of the transfer. In cases where there is no exact match between the name provided by the originator and the one registered by the beneficiary's entity, the originator may be informed of the registered name.

The processing carried out on the occasion of the verification of the beneficiary of a transfer is based on the legal obligation applicable to the controller, established by Regulation (EU) 2024/886 on instant payments, which requires payment service providers (PSPs) to offer a verification service of the match between the beneficiary's name and the IBAN, in order to avoid erroneous or fraudulent payments.

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.

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 derechosprotecciodatos@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 fraud attempts, BBVA is part of the Confirma System. The personal data you provide to BBVA as part of a transaction request (for example, for a checking account opening or financing application) will be communicated to the Confirma System 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 System 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 Data/DPO Contact 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 Confirma 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 organizational 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.

B) IF YOU ARE A REPRESENTATIVE OR PROXY:

1. 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 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. Comply with legal obligations and regulations applicable to BBVA

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

- Report to the Financial Ownership Database on a monthly basis regarding any checking accounts, savings accounts, securities accounts or term deposits that have been opened, closed, or modified. Therefore, your identification details will be added to that database, which is maintained by the State Secretariat for Economy and Business Support.
- Gather information about you and identify you to comply with the due diligence obligations imposed by this regulation.
- Analyze transactions completed through BBVA when required by law, 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).

3. 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.

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

For more information, please consult the content of this processing in section "A) If you are a Guarantor" included in heading 4. "To prevent fraud".

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.

C) 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 **contract execution or the adoption of pre-contractual measures**.

2. Comply with legal obligations and regulations applicable to BBVA

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

- Gather information about you and identify you to comply with the due diligence obligations imposed by this regulation.
- Analyze transactions completed through BBVA when required by law, 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).

D) 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 **contract execution or the adoption of pre-contractual measures**.

2. Comply with legal obligations and regulations applicable to BBVA

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

- Gather information about you and identify you to comply with the due diligence obligations imposed by this regulation.
- Analyze transactions completed through BBVA when required by law, 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).

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?

- 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 (only if you are a representative or authorized user);
- To national and European Union supervisory authorities, such as 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 (only if you are a guarantor);
- 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 the same section;
- To the Confirma fraud prevention systems;
- 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 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, 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 for your personal data not to be processed.
Restriction of processing	You can request that processing of your data be restricted under the following circumstances: <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	BBVA does not engage in automated processing involving minors without human intervention.

SERVICE CHANNELS

derechosprotecciondatos@bbva.com	BBVA Group Customer Services Department, APDO: 1598 - 28080 Madrid	BBVA Branches
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You can obtain more information on the consideration in relation to processing based on legitimate interest by requesting it through the following link <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>.

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, 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 \(www.agpd.es\)](http://www.agpd.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.