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, among other things, what rights you have related to its use.

BASIC INFORMATION ON DATA PROTECTION	
Data controller	Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA") with registered office at Plaza de San Nicolás 4, 48005 Bilbao, Spain. Email address: consultasgenerales@bbva.com. **More detail in Additional information section**
Purposes	If you are a representative, guarantor, authorized person, beneficiary, consenting spouse or non-debtor mortgagor, we will process your personal data at BBVA for the management of the contract in which you intervene due to your legal relationship with a BBVA customer. **More detail in Additional information section**
Rights	Your data is yours and you control it. Therefore, you may access at any time, rectify and erase the data, as well as request other rights, as explained in the section Additional information.
Additional information	You can consult the additional and detailed information on BBVA's Personal Data Protection in the section Additional information.

Finally, we remind you that this Personal Data Protection Policy may be updated and modified. Therefore, we recommend that you review it from time to time, without prejudice to the informative actions that we carry out from BBVA. You can always access the latest version of this document at the following link:

https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/LOPD-sin-DAE.pdf

Additional information

Below we expand all the details on how we process your personal data at BBVA.

Who is the controller of your personal data?

Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"), CIF A-48265169 and with 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 by accessing the website bbva.es, section Personal Data/Contact DPO or through the following link https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo.

Banco Bilbao Vizcaya Argentaria, S.A., con domicilio en la Plaza San Nicolás, número 4, 48005 Bilbao,inscrito en el Registro Mercantil de Vizcaya, al tomo 2.083, Folio 1, Hoja BI-17-A, Inscripción 1ª con C.I.F. A-48265169

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

- **If you are a guarantor:**
  - Identification and contact data (including postal and/or electronic addresses).
  - Signature data (including digitized and electronic signature).
  - Economic and wealth solvency data.
  - Sociodemographic data such as: age, marital status, family situation, residences, education and occupation (type of contract, seniority in employment) or membership of groups.
  - 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 from credit valuation companies such as Equifax Ibérica, S.L.; and Information from fraud prevention information systems, such as Confirma.
  - Data of other products in which you participate as a guarantor.
- **If you are a consenting spouse or non-debtor mortgagor:**
  - Identification and contact data (including postal and/or electronic addresses).
  - Signature data (including digitized and electronic signature).
  - Data of products and services in which you intervene.

At BBVA, we ask you to keep your data duly updated to ensure that the data we process are truthful, complete, accurate, and up to date at all times. If you modify them, you must inform us without delay so that we are aware of your current situation.

- **If you are a representative or authorized person:**
  - Identification and contact data (including postal and/or electronic addresses).
  - Signature data (including digitized and electronic signature).
  - Sociodemographic data such as: age, marital status, family situation, residences, education and occupation (type of contract, seniority in employment) or membership of groups.
  - Access and operational identification codes and passwords in the remote channels that you use in your relationship with BBVA.
  - Data of products and services in which you intervene.
  - Data regarding the status of representative of other legal entities.
  - Data obtained from other sources: Information from fraud prevention information systems, such as Confirma; information from information systems for identifying indications of fraud risk, such as Emailage or Telesign.
  - Information regarding knowledge and experience, level of education and professional experience in the financial sector.

In addition to those indicated above, there may be other additional personal data processing operations if you have agreed so with the Bank.

Please note that if, in addition, you were a BBVA private customer, BBVA could use your data derived from your contractual relationship with BBVA as a private customer for the purpose of preventing fraud in the operations in which you acted as a representative or

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

authorized person.

- **If you are a beneficiary:**
  - Identification and contact data (including postal and/or electronic addresses).
  - Signature data (including digitized and electronic signature).
  - Access and operational identification codes and passwords in the remote channels that you use in your relationship with BBVA.
  - Data of products and services in which you intervene.
  - Information regarding knowledge and experience, level of education and professional experience in the financial sector.

In addition to those indicated above, there may be other instances of personal data processing if you have agreed to them with the Bank.

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

A) IF YOU ARE A GUARANTOR:

1. Manage the contracting of the products and services in which you participate, in particular to:

- Manage the guarantee you have set up in favor of BBVA.
- Manage the relationship we have with you and your financial evolution.
- Send you non-commercial notifications to manage your relationship with BBVA.
- Control, analyze and manage risk situations, defaults, incidents or claims.
- Manage your access to the different channels that BBVA makes available to you so that you can access and manage the products and services you have contracted with BBVA.

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

2. Comply with legal obligations and regulations applicable to BBVA

(i) Inform and consult the CIRBE

At BBVA we are obliged to communicate to the Risk Information Center of the Bank of Spain (CIRBE) the risks of your banking operations as a customer, together with your personal data and your status as a sole proprietor, where applicable. BBVA may consult the data about you that may appear in CIRBE to manage your financing request, verify and assess your solvency and credit risk, if you maintain financing products or services with the Bank.

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

(ii) Prevention of money laundering and terrorist financing

To prevent money laundering and terrorist financing, we have the obligation to:

- Collect information about you and identify you to comply with the due diligence obligations imposed by this regulation.
- Carry out analysis of operations carried out on your account through BBVA and, where appropriate, communicate them to Sepblac.

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

- Provide information on operations to national authorities and other countries, inside and outside the European Union, based on the legislation of some countries and agreements signed between them.

The lawful basis is compliance with a **legal obligation** (Law 10/2010, of April 28, on the Prevention of Money Laundering and Terrorist Financing and Law 5/2015 promoting business financing and its implementing regulations).

(iii) Creation of risk models

Spanish and European regulations (for example, from 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, the calculation of the Capital and Provisions required by each operation and customer in relation to the different phases of risk management: admission, (risk/price/delegation), monitoring, collection and recoveries. This regulation requires data processing in the elaboration of risk profiles and risk models regarding its detail and historical depth.

The lawful basis is compliance with a **legal obligation** provided for in the regulations for credit institutions and investment firms and for solvency and financial risk control.

The analytical models applied for the preparation of profiles may lead us to adopt automated decisions for compliance with the regulations indicated above. You can consult the details of the decision that could be adopted in this way at this 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 adopted, collect your comments on it and challenge the decision.

(iv) Beneficiary Verification Service for SEPA area transfers

The participating entities in a SEPA transfer may process the data of the beneficiary (name, surname, ID) and their account number (IBAN) for the purpose of verifying that the beneficiary designated by the ordering party is effectively the holder of the transfer's destination account. In cases where there is no exact match between the name provided by the ordering party and the one registered by the beneficiary's entity, the ordering party 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 imposes on payment service providers (PSPs) the obligation to offer a verification service for matching the name of the beneficiary and the IBAN, in order to avoid erroneous or fraudulent payments."

3. Inform and Consult credit information systems

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

We inform you that we can communicate the data of your debts to the entities that manage credit information systems when:

- It is a certain, due and payable debt that has resulted unpaid, whose existence or amount you have not claimed via administrative, judicial or arbitral channels.

- 5 years have not elapsed since the date the debt should have been settled, the maturity of the obligation or the specific term, if it is of periodic maturity.

The lawful basis of any communication to the credit information systems as well as the consultation for requests referred to consumer credits is the legitimate interest of BBVA in complying with responsible credit criteria.

The lawful basis for the consultation referring to requests for real estate credits under Law 5/2019, of March 15, regulating real estate credit contracts, is compliance with a legal obligation.

4. Prevent fraud

We will use your personal data to prevent fraud situations in the contracting of our products and services, as well as to prevent situations where you could be harmed as a consequence of fraudulent action by third parties.

The lawful basis is the **legitimate interest** of BBVA in preventing these situations from occurring with the resulting harm to you and, where applicable, to the entity itself. You can exercise your right to object by sending an email to:

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

derechosprotecciondatos@bbva.com or request it at any of our branches.

In addition, to comply with this purpose we may inform and consult the data that appear in the following information systems:

(i) Confirma File

In order to prevent and avoid possible fraud attempts, BBVA is adhered to the Confirma File. The personal data that you provide to BBVA in the context of an operation request (for example, for a request to open a checking account or financing) will be communicated to the Confirma File for the purpose of cross-checking requests and operations registered in the File by the adhered entities to assess the probability of fraud of the request.

The legal basis for the processing of personal data is BBVA's legitimate interest in preventing fraud, during the process of processing requests, to avoid possible negative economic consequences and legal breaches. Consulting the Confirma File is suitable for the purpose pursued, and proportionate in relation to the benefit obtained by the joint controllers and the impact on the privacy of the applicants. Likewise, data processing is framed within the reasonable expectations of data subjects since it is a common practice and occurs in the context of a contracting request. To avoid harm and negative consequences for the applicants, technical and organizational measures have been adopted to reinforce the confidentiality and security of this information.

The joint controllers are the entities adhered to the Regulations of the Confirma File, with the data processor being Confirma Sistemas de Información, S.L., with address at Paseo de la Castellana, 163, 2ª planta, Edificio Utopicus Castellana, 28046, Madrid. You can check the list of Entities that are currently adhered to the Regulations of the Confirma File on the website www.confirmasistemas.es. Entities that adhere to its Regulations and whose scope of activity may be subject to fraud in contracting may participate in the Confirma File. The data communicated to the Confirma File may be consulted by the rest of the entities adhered to the Regulations of the Confirma File.

The maximum conservation period of your personal data will be five years. The transfer of your personal data to a third country or international organization is not foreseen.

In accordance with current regulations on data protection, you may exercise your rights of access, rectification, erasure, objection, restriction of processing, not to be subject to automated individual decisions with legal effects, and portability, by contacting the address of the data processor, Confirma Sistemas de Información, S.L., at the address indicated above. Furthermore, you may exercise your right to file a claim with the Spanish Data Protection Agency (www.aepd.es). Confirma Sistemas de Información, S.L. has appointed a Data Protection Officer whom you can contact via email at esdpo@transunion.com for privacy-related requests related to the Confirma File.

B) IF YOU ARE A REPRESENTATIVE OR AUTHORIZED PERSON:

1. Manage the contracting of the products and services in which you participate, in particular to:

- The management of the contract in which you intervene in your capacity as a representative or authorized person, due to your legal relationship with a BBVA customer, within the scope of the powers, authorizations or instructions received from said customer for the contracting of products, services or operations.
- Send you non-commercial notifications to manage your relationship with BBVA or the customer you represent.
- Manage your access to the different channels that BBVA makes available to you so that you can access and manage the products and services due to your legal relationship with a BBVA customer.

The lawful basis is the legitimate interest of BBVA consisting of maintaining commercial and contractual relationships with the entity you represent, in accordance with the provisions of article 19 of Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights.

2. Comply with legal obligations and regulations applicable to BBVA

(i) Prevention of money laundering and terrorist financing

To prevent money laundering and terrorist financing, we have the obligation to:

- Declare monthly to the Financial Ownership File the opening, cancellation or modification of any current, savings, securities or term deposit accounts. Therefore, your identifying data will form part of this file, the data controller for which is the Secretariat of State for Economy and Business Support.

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

- Collect information about you and identify you to comply with the due diligence obligations imposed by these regulations.

- Carry out analyses of transactions carried out through BBVA when required by law, and where appropriate, report them to Sepblac.

- Provide information on transactions to national authorities and those of other countries, inside and outside the European Union, on the basis of the legislation of some countries and agreements signed between them.

The basis for legitimization is compliance with a **legal obligation** (Law 10/2010, of April 28, on the Prevention of Money Laundering and Terrorist Financing and Law 5/2015 on the promotion of business financing and its implementing regulations).

3. Prevent fraud

We will use your personal data to prevent situations of fraud in the contracting of our products and services, as well as to prevent situations in which you could be harmed as a consequence of the fraudulent actions of third parties.

The basis for legitimization is the legitimate interest of BBVA in preventing these situations from occurring with the resulting harm to you and, where applicable, to the entity itself. You may exercise your right to object by sending an email to: derechosprotecciondatos@bbva.com or request it at any of our branches.

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

(i) Confirma File

Please, for more information, see the content regarding this processing in section "A) If you are a Guarantor" included in section 4. "Prevent fraud".

(ii) Emailage and Telesign

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

The personal data that will be communicated 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 basis for legitimization of the communication of your personal data to Emailage and Telesign is BBVA's legitimate interest in detecting conduct in which there may be anomalies that allow the existence of signs of irregular or fraudulent behavior to be assessed and in preventing fraudulent situations from occurring that could cause harm to both the data subjects and BBVA.

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

C) IF YOU ARE A BENEFICIARY:

1. Manage the contracting of products and services in which you participate, in particular for:

- The management of the contract in which you intervene in your capacity as beneficiary due to your legal relationship with a BBVA customer.

- To send you non-commercial notifications to manage your relationship with BBVA.

- To manage your access to the different channels that BBVA makes available to you so that you can access and manage the products and services you have contracted with BBVA.

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

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

2. Comply with legal obligations and regulations applicable to BBVA

(i) Prevention of money laundering and terrorist financing

To prevent money laundering and terrorist financing, we have the obligation to:

- Collect information about you and identify you to comply with the due diligence obligations imposed by these regulations.
- Carry out analyses of transactions carried out through BBVA when required by law, and where appropriate, report them to Sepblac.
- Provide information on transactions to national authorities and those of other countries, inside and outside the European Union, on the basis of the legislation of some countries and agreements signed between them.

The basis for legitimization is compliance with a **legal obligation** (Law 10/2010, of April 28, on the Prevention of Money Laundering and Terrorist Financing and Law 5/2015 on the promotion of business financing and its implementing regulations).

D) IF YOU ARE A CONSENTING SPOUSE OR A NON-DEBTOR MORTGAGOR:

1. Manage the contracting of products and services in which you participate, particularly to:

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

The legal basis is the **performance of a contract or the taking of pre-contractual measures.**

2. Comply with legal obligations and regulations applicable to BBVA

(i) Prevention of money laundering and terrorist financing

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

- Collect information about you and identify you in order to comply with the due diligence obligations imposed by these regulations.
- Analyze transactions carried out through BBVA when required by law and, where applicable, report them to Sepblac.
- Provide information on transactions to national authorities and authorities in other countries—both within and outside the European Union—based on the legislation of certain countries and agreements signed between them.

The legal basis is compliance with a **legal obligation** (Law 10/2010 of April 28 on the Prevention of Money Laundering and Terrorist Financing and Law 5/2015 on the promotion of business financing and its implementing regulations).

How long will we keep your data?

We will keep your personal data for the duration of the contractual relationship or for as long as they are necessary for the specific purpose of each processing. Subsequently, we will keep blocked those that are necessary to:

i) comply with legal obligations; in particular:

a. 10 years in application of the regulations on the prevention of 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 legal claims or actions.

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

Once these periods have elapsed, we will destroy your personal data.

To whom will we communicate your data?

- To the Risk Information Center of the Bank of Spain (CIRBE) we communicate risk transactions based on compliance with legal obligations (if you are a customer or guarantor);
- To the Financial Ownership File of the Secretariat of State for Economy and Business Support, we communicate identifying data and certain contracted products for compliance with the regulations on the prevention of money laundering and terrorist financing (only if you are a representative or authorized person);
- To national and European Union supervisory authorities, such as the Bank of Spain, the European Central Bank, the European Banking Authority (EBA) and the National Securities Market Commission, when we are obliged to do so.
- To national authorities and those of other countries, inside and outside the European Union, in compliance with the regulations on the prevention of money laundering and terrorist financing; and on fraud prevention;
- To the BBVA Group companies for compliance with their internal regulations on the prevention of financial crime, their legal obligations regarding the prevention of money laundering, as well as regulatory reporting to supervisory authorities.
- To the entities that manage credit information systems, we communicate debts that meet the requirements for this purpose based on compliance with the regulations (only if you are a guarantor);
- To the Confirma fraud prevention files (only if you are a guarantor, representative or authorized person);
- To third-party owners of IT tools intended to identify prevalent fraud risk based on certain information, such as Emailage or Telesign. In the case of Telesign, the communication will entail an international data transfer to the United States, for which guarantees similar to those indicated in this same section have been adopted;
- To Judges, Courts, the Public Prosecutor's Office and/or the competent Public Administrations we communicate the necessary information in the event of possible claims when we are obliged to do so;

In order to manage the legal relationship in which you intervene and provide an adequate service, at the following address **https://www.bbva.es/content/dam/public-web/bbvaes/documents/legal/tratamiento-de-datos/proveedores.pdf** you will find a list by categories of the companies that process your data on behalf of BBVA.

In addition, we inform you that, for the same purpose as indicated in the previous paragraph, certain companies that provide services to BBVA and are located outside the European Union could access your personal data (international data transfers). These transfers are made: (i) to countries with a level of protection comparable to that of the European Union (adequacy decisions of the European Commission); (ii) through standard contractual clauses as well as; (iii) or based on other adequate safeguards provided for by law.

In any case, BBVA signs contracts with these service providers that guarantee the processing of the data by them in accordance with BBVA's instructions and with full compliance with the applicable data protection regulations.

For more information you can contact the BBVA Data Protection Officer by accessing the website bbva.es, Personal Data/ DPO Contact section or through the following link https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo.

What are your rights when you provide us with your data?

RIGHT	CONTENT
Access	You will be able to consult your personal data included in BBVA files.
Rectification	You will be able to modify your personal data when it is inaccurate.
Erasure	You will be able to request the deletion of your personal data.
Objection	You will be able to request that your personal data not be processed.

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169

Restriction of processing	You will be able to request the restriction of the processing of your data in the following cases: ■ While the challenge to the accuracy of your data is verified. ■ When the processing is unlawful, but you object to the deletion of your data. ■ When BBVA does not need to process your data but you need it for the establishment, exercise or defense of legal claims. ■ When you have objected to the processing of your data for the performance of a task carried out in the public interest or for the purposes of a legitimate interest, while verifying whether the legitimate grounds for the processing override yours.
Portability	You will be able to receive, in an electronic format, the personal data you have provided to us and those obtained from your contractual relationship with BBVA, as well as transmit them to another entity.
Not to be subject to decisions based solely on automated processing	BBVA does not carry out automated processing of personal data concerning minors without human intervention.

CUSTOMER SERVICE CHANNELS

derechosprotecciondatos@bbva.com	BBVA Group Customer Service, PO Box: 1598 - 28080 Madrid	BBVA Branches

You can obtain more information about the balancing test carried out regarding processing based on legitimate interest by requesting it through the following link https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo.

If you believe that we have not processed your personal data in accordance with the regulations, you can contact the Data Protection Officer by accessing the website bbva.es, Personal Data/DPO Contact section or through the following link: https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo.

However, you may file a claim with the Spanish Data Protection Agency (www.aepd.es).

The exercise of these rights is free of charge.

Banco Bilbao Vizcaya Argentaria, S.A., with registered address at Plaza San Nicolás, number 4, 48005 Bilbao, registered in the Commercial Registry of Biscay, volume 2.083, Folio 1, Sheet BI-17-A, 1st Registration with C.I.F. A-48265169