

PERSONAL DATA PROTECTION POLICY

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

This section explains what BBVA will use your data for and, among other aspects, what rights you have related to its use.

In your capacity as a representative of a BBVA client, you undertake to disclose this personal data policy to any other natural person who may interact with BBVA during the performance of their duties for the BBVA client.

Basic information on data protection

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 details in the Additional Information section
Purposes	If you are a representative, guarantor, authorised person, beneficiary, consenting spouse, or non-debtor mortgagee, acting as an agent for a BBVA client, we will process your personal data to manage the contract that which you are a party to, due to your legal relationship with a BBVA client. More details in the Additional Information section.
Rights	Your data is yours and you control it yourself. That means that you can access, rectify and delete the data at any time, and request any other rights, as explained in the Additional Information section.
Additional Information	You can find additional, detailed information on BBVA's Personal Data Protection in the Additional Information section.

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 BBVA may carry out. You can access the latest version of this document at any time here:

<https://www.bbvacib.com/personal-data-protection/>

Additional Information

Below you can find all the details on how we process your personal data at BBVA.

1. Who is responsible for processing your personal data (the controller)?

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

2. How can you contact BBVA's Data Protection Officer?

You can contact BBVA's Data Protection Officer by going to bbva.es website and the personal data/contact DPO section, or going to

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

3. What data do we process? How do we collect your data?

3.1. If you are a Guarantor:

- Identification and contact data (including voice, postal and/or email addresses).
- Signature data (including digitalised and electronic signature).
- Economic data and solvency data.
- Sociodemographic data such as age, marital status, family situation, residences, education and occupation (type of contract, length of employment) or group membership.

- Data from other sources: Solvency information from the Bank of Spain's Central Risk Information Centre (CIRBE); information 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 rating companies such as Equifax Ibérica, S.L.; information from fraud prevention information systems, such as Confirma.
- Data about other products in which you participate as a guarantor.

3.2. If you are a consent-giving spouse or a non-debtor mortgagee:

- Identifying and contact data (including postal and/or email addresses).
- Signature data (including digitalised and electronic signature).
- Data on products and services in which you are involved.

At BBVA, we ask you to keep your data duly updated so that the data we process is true, accurate and up to date at all times. If you change your data, you must tell us without delay so that we are aware of your current situation.

3.3. If you are an agent, representative or authorised person:

- Identification and contact data (including voice, postal and/or email addresses).
- Signature data (including digitalised and electronic signature).
- Sociodemographic data such as age, marital status, family situation, residences, education and occupation (type of contract, length of employment) or group membership.
- Access and operational identification codes and passwords on the remote channels you use in your relationship with BBVA.
- Data on products and services in which you are involved.
- Data on the status of representative, agent or authorised person of other legal persons.
- Data from other sources: Information from fraud prevention information systems, such as Confirma; information from systems for identifying signs of fraud risk, such as Emailage or Telesign.
- Information on knowledge and experience, level of education and professional experience in the financial sector.

In addition to the above, other personal data processing may apply if you have agreed thereto with the Bank.

Please note that if you are also an individual customer of BBVA, BBVA may use the data derived from your contractual relationship as an individual customer in order to prevent fraud in transactions in which you act as an agent, representative or authorised person.

3.4. If you are a beneficiary:

- Identifying and contact data (including postal and/or email addresses).
- Signature data (including digitalised and electronic signature).
- Access and operational identification codes and passwords on the remote channels you use in your relationship with BBVA.
- Data on products and services in which you are involved.
- Information on knowledge and experience, level of education and professional experience in the financial sector.

In addition to the above, other personal data processing may apply if you have agreed thereto with the Bank.

4. For what purposes and under what legal basis do we process your personal data?

4.1. If you are a guarantor:

4.1.1. Manage the arrangement of the products and services you are a party to, in particular to:

- Manage the guarantee you provided to BBVA.
- Manage the relationship we have with you and your financial performance.
- Send you non-commercial notifications for managing your relationship with BBVA.
- Control, analyse and manage risk situations, non-payments, incidents or complaints.
- Manage your access to the channels made available by BBVA so that you can access and manage the products and services you have with BBVA.

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

4.1.2. Comply with legal obligations and regulations applicable to BBVA:

i. Inform and consult the CIRBE

At BBVA, we are obliged to communicate to the Bank of Spain's Risk Information Centre (CIRBE) the risks of your banking operations as a client, together with your personal data and your status as an individual entrepreneur, if applicable. BBVA may consult the data about you, as a guarantor of a BBVA client, found in the CIRBE to manage your financing application, verify and assess your solvency and credit risk, if you maintain financing products or services with the Bank.

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

ii. Prevention of money laundering and terrorist financing

To prevent money laundering and terrorist financing, we are under an obligation to:

- Collect information about you and identify you in order to comply with the due diligence obligations set forth by these regulations.
- Perform analyses of transactions on your account through BBVA, and where appropriate, report them to Sepblac.
- Provide information about transactions to the authorities of Spain and of other countries inside and outside the European Union, according to the legislation of countries and agreements signed between them.

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

iii. Creating risk models

Spanish and European regulations (for example those of 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 Capital and Provisions required by each transaction and client in relation to the different stages of risk management: approval, (risk/price/delegation), monitoring, collection and recoveries. These regulations set out the processing of data in risk profiling and risk models in terms of detail and historical depth.

The legal basis is compliance with a legal obligation established in the regulations of credit institutions, investment companies, and solvency and financial risk control firms.

The analytical models applied for profiling may lead us to adopt automated decisions to comply with the regulations indicated above. For details of this type of decision:

<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 taken, gather your comments, and challenge the decision.

4.1.3. Inform and consult credit information systems

To analyse the economic viability of the applications and transactions for which you are a guarantor, BBVA needs to consult your data 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).

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

- They are certain, overdue and enforceable and have not been paid, the existence or amount of which you have not contested through administrative, judicial or arbitration channels.
- Five years have not yet passed since the date on which the debt payment was due, the date of expiry of the obligation or of the specific instalment (in the case of periodic instalments).

The legal basis for any communication to credit information systems, as well as the consultation for applications referring to consumer finance, is BBVA's legitimate interest in complying with the criteria of responsible credit.

The legal basis for consulting applications on real estate credits under Law 5/2019, of 15 March, regulating real estate credit agreements, is the fulfilment of a legal obligation.

4.1.4. Preventing fraud

We will use your personal data to prevent fraudulent situations in product and service contracts, as well as to avoid situations in which damage could be caused to you as a result of the fraudulent actions of third parties.

The legal basis is BBVA's legitimate interest in preventing these situations from occurring with the consequent damage to you and, where appropriate, to the institution itself. You can exercise your right to object by sending an email to: gdprbbvacib@bbva.com or derechosprotecciondatos@bbva.com or request it at any of our branches.

In addition, for the fulfilment of this purpose we may enter and consult the data found in the following information systems:

- Confirma filing system

In order to prevent and avoid possible fraud attempts, BBVA is a member of the Confirma filing system. The personal data that you provide to BBVA for a transaction request (for example, a request to open a current account or financing) will be reported to the Confirma filing system for the purpose of comparing requests and transactions registered in the system by the member entities, to assess the likelihood of fraud in the request.

The joint data controllers are the entities adhered to the regulations of the Confirma filing system. The data processor is Confirma Sistemas de Información, S.L., with address at Avda. de la Industria, 18, TRES CANTOS (28760) MADRID. You can consult the list of entities that are currently adhered to the regulations of the Confirma filing system on the website www.confirmasistemas.es. Entities that adhere to its regulations and that, in their field of activity, may be susceptible to contract fraud may participate in the Confirma filing system. The data reported to the Confirma filing system may be consulted by the rest of the entities adhering to the system's regulations. You can request additional information as well as the essential aspects of the agreement of joint responsibility between the adhered entities by going to bbva.es and checking the personal data/contact DPO section, or going to <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>

The legal basis is the legitimate interest of the entities participating in the Confirma filing system to prevent fraud and reduce identity theft and document tampering, thus ensuring that customers are more protected and suffer less economic damage, which will benefit the interests of society as a whole. Reducing the opportunities for fraudulent actions results in a reduction, in general terms, of the crime involved and the implications for other crimes such as money laundering or terrorist financing. Therefore, this filing system clearly benefits your own interests, as it is intended to protect you against fraudulent practices by third parties that may affect you individually.

Consulting the Confirma filing system is ideal for the intended purpose and proportional in relation to the benefit obtained by the member entities and the impact on your privacy. Furthermore, data processing is within your reasonable expectation as it is a common practice and occurs within the framework of a transaction request. To avoid damage and negative consequences for you, technical and organisational measures have been adopted to strengthen the confidentiality and security of your information. Your personal data will be stored for a maximum period of five years. There are no plans to transfer your personal data to a third country or international organisation.

In accordance with current data protection regulations, **you may exercise your rights of access, rectification, erasure, objection, restriction of processing and portability, by contacting the data processor, Confirma Sistemas de Información, S.L.**, at the address indicated above. You may also exercise your right to file a complaint 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 on dpo@confirmasistemas.es for privacy requests related to the Confirma filing system. If you do not agree, you can object by sending an email to: dpo@confirmasistemas.es

4.2. If you are acting as an agent or are a representative or authorised person:

4.2.1. Manage the arrangement of the products and services you are a party to, in particular to:

- Manage the contract that you are a party to, by any means (including in person, online or by telephone), in your capacity as an agent, representative or authorised person, due to your legal relationship with a BBVA client within the scope of the powers or

instructions received from said client to take out products or services or carry out transactions.

- Send you non-commercial notifications to manage your relationship with BBVA or the client you work for.
- Manage your access to the channels made available by BBVA so that you can access and manage the products and services due to your legal relationship with a BBVA client.

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

4.2.2. Comply with legal obligations and regulations applicable to BBVA

i. Preventing money laundering and terrorist financing

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

- Submit monthly reporting to the Financial Ownership File on the opening, cancellation or modification of any current, savings, securities or time deposit accounts. Therefore, your identification data will be added to this file, which is the responsibility of the Ministry of Economy and Business Support.
- Collect information about you and identify you in order to comply with the due diligence obligations set forth by these regulations.
- Carry out analyses of transactions conducted through BBVA when required by law, and if applicable, report them to Sepblac.
- Provide information on transactions to authorities of Spain and of other countries inside and outside the European Union, on the basis of the legislation of some countries and agreements signed between them.

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

ii. Recording of calls and electronic communications

In order to strengthen investor protection, improve market surveillance and increase legal certainty for the benefit of institutions and their clients, the law sets forth the obligation to record telephone conversations and electronic communications in connection with the closing of transactions for proprietary trading and order reception, transmission and execution. This also includes telephone conversations and electronic communications made with the intention of entering into transactions, even if they do not ultimately take place. **The legal basis is compliance with a legal obligation (art. 177 LMVSI and article 90 Royal Decree 813/2023).**

Also, telephone conversations and electronic communications will be recorded to carry out controls to detect and prevent market abuse, **the legal basis of which will be BBVA's legitimate interest in detecting transactions suspected of the illicit transmission of privileged information, its illicit use, and market manipulation conduct or activity.**

4.2.3. Preventing fraud

We will use your personal data to prevent fraudulent situations in product and service contracts, as well as to avoid situations in which damage could be caused to you as a result of the fraudulent actions of third parties.

The legal basis is BBVA's legitimate interest in preventing these situations from occurring with the consequent damage to you and, where appropriate, to the institution itself. You can exercise your right to object by sending an email to: gdprbbvacib@bbva.com or derechosprotecciondatos@bbva.com or request it at any of our branches.

In addition, for the fulfilment of this purpose we may enter and consult the data found in the following information systems:

i. Confirma filing system

In order to prevent and avoid possible fraud attempts, BBVA is a member of the Confirma filing system. The personal data that you provide to BBVA for a transaction request (for example, a request to open a current account or financing) will be reported to the Confirma filing system for the purpose of comparing requests and transactions registered in the system by the member entities, to assess the likelihood of fraud in the request.

The joint data controllers are the entities adhered to the regulations of the Confirma filing system. The data processor is Confirma Sistemas de Información, S.L., with address at Avda. de la Industria, 18, TRES CANTOS (28760) MADRID. You can consult the list of entities that are currently adhered to the regulations of the Confirma filing system on the website www.confirmasistemas.es. Entities that adhere to its regulations and that, in their field of activity, may be susceptible to contract fraud may participate in the Confirma filing system. The data reported to the Confirma filing system may be consulted by the rest of the entities adhering to the system's regulations. You can request additional information as well as the essential aspects of the agreement of joint responsibility between the adhered entities by going to bbva.es and checking the personal data/contact DPO section, or going to <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>

The legal basis is the legitimate interest of the entities participating in the Confirma filing system to prevent fraud and reduce identity theft and document tampering, thus ensuring that customers are more protected and suffer less economic damage, which will benefit the interests of society as a whole. Reducing the opportunities for fraudulent actions results in a reduction, in general terms, of the crime involved and the implications for other crimes such as money laundering or terrorist financing. Therefore, this filing system clearly benefits your own interests, as it is

intended to protect you against fraudulent practices by third parties that may affect you individually.

Consulting the Confirma filing system is ideal for the intended purpose and proportional in relation to the benefit obtained by the member entities and the impact on your privacy. Furthermore, data processing is within your reasonable expectation as it is a common practice and occurs within the framework of a transaction request. To avoid damage and negative consequences for you, technical and organisational measures have been adopted to strengthen the confidentiality and security of your information. Your personal data will be stored for a maximum period of five years. There are no plans to transfer your personal data to a third country or international organisation.

In accordance with current data protection regulations, you may exercise your rights of access, rectification, erasure, objection, restriction of processing and portability, by contacting the data processor, Confirma Sistemas de Información, S.L., at the address indicated above. You may also exercise your right to file a complaint 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 on dpo@confirmasistemas.es for privacy requests related to the Confirma filing system. If you do not agree, you can object by sending an email to: dpo@confirmasistemas.es

ii. Emailage and Telesign

In order to assess the risk of fraud, we need to disclose certain personal data to Emailage Corporation ("Emailage"), located at 16 Great Queen Street, Covent Garden, London (United Kingdom), and Telesign Corporation ("Telesign"), located at 13274 Fiji Way Suite 600, Marina Del Rey, CA 90292 (United States), which provide services to BBVA for the verification of the mobile phone, email address and IP address data that you submit to us in an asset application.

The reported personal data will be: email and IP address to Emailage; and the contact telephone number to Telesign, so that these entities can identify potentially fraudulent data.

The legal basis for the communication of your personal data to Emailage and Telesign is BBVA's legitimate interest in detecting conduct in which there may be anomalies considered to be signs of irregular or fraudulent behaviour, and to prevent fraudulent situations that could cause damage to both the data subjects and BBVA.

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

4.3. If you are a beneficiary:

4.3.1. Manage the arrangement of the products and services you are a party to, in particular to:

- Manage the contract that you are a party to, in your capacity as beneficiary through your legal relationship with a BBVA client.
- Send you non-commercial notifications for managing your relationship with BBVA.
- Manage your access to the channels made available by BBVA so that you can access and manage the products and services you have with BBVA.

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

4.3.2. Comply with legal obligations and regulations applicable to BBVA

- i. Preventing money laundering and terrorist financing

To prevent money laundering and terrorist financing, we are under an obligation to:

- Collect information about you and identify you in order to comply with the due diligence obligations set forth by these regulations.
- Carry out analyses of transactions conducted through BBVA when required by law, and if applicable, report them to Sepblac.
- Provide information about transactions to the authorities of Spain and of other countries inside and outside the European Union, according to the legislation of countries and agreements signed between them.

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

4.4. If you are a consent-giving spouse or a non-debtor mortgagee:

4.4.1. Manage the arrangement of the products and services you are a party to, in particular to:

- Manage the maintenance, compliance, development, control and execution of the provisions of the contracts that you are a party to.
- Send you non-commercial notifications for managing your relationship with BBVA.

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

4.4.2. Comply with legal obligations and regulations applicable to BBVA

i. Preventing money laundering and terrorist financing

To prevent money laundering and terrorist financing, we are under an obligation to:

- Collect information about you and identify you in order to comply with the due diligence obligations set forth by these regulations.
- Carry out analyses of transactions conducted through BBVA when required by law, and if applicable, report them to Sepblac.
- Provide information about transactions to the authorities of Spain and of other countries inside and outside the European Union, according to the legislation of countries and agreements signed between them.

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

5. How long will we keep your information for?

We will retain your personal data for the duration of the contractual relationship or for as long as it is necessary for the specific purpose of the processing. Subsequently, we will block any data needed for:

- i. Compliance with legal obligations, in particular:
 - 10 years in application of the regulations on the prevention of money laundering and terrorist financing.
 - During the maximum period of time defined by the regulations applicable to financial institutions regarding the calculation of capital and provisions (European Central Bank, European Banking Authority and Bank of Spain).
- ii. During the statutory limitation periods for the purposes of claims or legal actions.

After these periods, we will delete your personal data.

6. Whom will we disclose your information to?

- To the Bank of Spain's Risk Information Centre (CIRBE), we report risk transactions based on compliance with legal obligations (only if you are a guarantor);

- to the Financial Ownership File of the Secretary of State for the Economy and Business Support, we report identification data and certain products arranged, for compliance with the regulations on the prevention of money laundering and terrorist financing (only if you are a representative or authorised 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, where we are required to do so.
- to authorities in Spain and in other countries inside and outside the European Union, in compliance with the regulations on the prevention of money laundering and terrorist financing, and fraud prevention;
- to the companies of the BBVA Group for compliance with their internal regulations on the prevention of financial crime, their legal obligations to prevent money laundering as well as regulatory reporting to the supervisory authorities;
- we communicate debts that meet the applicable regulatory requirements to the entities that manage the credit information systems (only if you are a guarantor);
- to the Confirma fraud prevention filing systems;
- to third-party owners of IT tools aimed at identifying fraud risk using certain information, such as Emailage or Telesign. In the case of Telesign, reporting will involve an international transfer of data to the United States, in respect of which guarantees similar to those indicated in this section have been adopted;
- to judges, courts, public prosecutor's office and/or the competent public authorities, we disclose the necessary information in case of possible claims when we are obliged to do so.

In order to provide an appropriate 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 category) of companies that process data on behalf of BBVA, under their service provision agreements.

We also inform you that, for the same purpose as that indicated in the previous paragraph, certain companies that provide services to BBVA may have access to 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 (European Commission suitability decisions); (ii) through standard contractual clauses; or (iii) based on other suitable guarantees provided by law.

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

For more information, you can contact BBVA's Data Protection Officer by going to bbva.es and checking the personal data/contact DPO section, or going to <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>

7. What are your rights when you provide us with your details?

Rights	Content
Access	You can consult your personal data held in BBVA's filing systems.
Rectification	You can modify your personal data in the case of inaccuracies.
Erasure	You may request the erasure of your personal data.
Objection	You may request that your personal data not be processed.
Processing restriction	<p>You can request a restriction on the processing of your data in the following cases:</p> <ul style="list-style-type: none"> • While any dispute over the accuracy of your data is being checked. • When such processing is illegal, but you object to your data being erased. • When BBVA does not need to process your data but you need it to assert or defend claims. • When you have objected to your data being processed in order to comply with a task in the public interest or to satisfy a legitimate interest, while it is being verified whether the legitimate reasons for processing prevail over your own.
Portability	You can receive an electronic version of the personal data you have provided to us and any resulting from your contractual relationship, and transfer it to another company.
Not to be subject to decisions based solely on automated processing	BBVA does not carry out automated processing of personal data about minors without human intervention.

For marketing of investment products and services, you can access a copy of the conversation recordings for a period of five years and, when requested by the CNMV, for a period of up to seven years.

8. Service channels

gdprbbvacib@bbva.com or derechosprotecciondatos @bbva.com	Servicio Atención al Cliente Grupo BBVA, APDO: 1598 - 28080 Madrid	BBVA branches
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If you consider that we have not processed your personal data in accordance with the regulations, you can contact the Data Protection Officer by going to bbva.es, personal data/contact DPO section or <https://www.bbva.es/general/tratamiento-datos.html#contacto-dpo>

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

Exercise of these rights is free of charge.

You can also withdraw your consent at any time, without affecting the lawfulness of the processing, as well as set up your options and the consents given from your online banking, the BBVA App, as well as by emailing your request to gdprbbvacib@bbva.com or derechosprotecciondatos@bbva.com, or sending it to the BBVA Group Customer Service, APDO: 1598 - 28080 Madrid, or by visiting one of our branches.

9. Digital and Electronic signature

The methods BBVA offers for service contracting and arrangement include signatures using devices that digitise writing (e.g. electronic tablets) and electronic signatures using passwords. At the time of signing, we will ask for your agreement with the signature method used, which will have the same value as the handwritten signature on paper.

The digital or electronic signature will be used to identify you in commercial and/or contractual relationships with BBVA. Use of such signatures may be essential for the relationship with BBVA. If you change your mind and no longer want to use them as a means of contracting and engaging with BBVA in the future, this may force the Bank to cancel any products or services you have contracted using such signatures.