

Ibercaja Group Personal Data Protection Policy

Please read this Data Protection Policy carefully. The purpose of this policy is to provide you with general information on how we in the Ibercaja Group process your personal data. We want you to know when and how we will ask you for your personal data, the purpose and legal justification for which we want to use them, whether anyone else is going to access them, and the various rights available to you and how you can exercise them.

In any event, whenever we ask you to provide any personal data, we will inform you in detail of all this before we collect and process them. We are doing this so you are fully aware of the legal conditions under which we will process them.

1. Who is legally the "Controller" of your data?

First, when we ask to collect your personal data, we will first tell you who is the company legally responsible for its processing.

Generally speaking, this will be the financial institution **Ibercaja Banco S.A.** ("Ibercaja" for the purpose of this document) whose registered office is in Zaragoza, Plaza Paraíso no 2, 50.004 Zaragoza. You can also contact us by email at: dpo@ibercaja.es.

However, since Ibercaja is part of a broader financial group (that includes other companies such as those listed at www.ibercaja.es/gdpr/grupo), sometimes one of these companies may act as controller.

In any case, before requesting and collecting your data, we will tell you who the controller is.

2. Who is the Ibercaja Data Protection Officer?

At Ibercaja we have appointed a person to protect your privacy to guarantee that we comply with the various legal requirements contained in Spanish and European personal data protection regulations.

This is the Data Protection Officer, whom you may contact by email at the following email address: dpo@ibercaja.es

3. For what purposes can we collect and process your personal data? And on what legal basis?

At Ibercaja we may collect and process your personal data for a number of purposes.

For example, if you are a customer, we need to process your data to manage the products and services you have purchased from us. If you are not a customer, but simply access our website or telephone service, we may need them to respond to any queries or claims you may have; or if you send us your CV as part of a recruitment process, so that we can evaluate your candidacy.

We also have video surveillance systems in our branches, which capture images of people who enter them, for security reasons. As such, if you visit any of our branches, we may record your image.

As a financial institution we have a series of legal obligations that we must meet (such as with the Spanish Tax Agency, the Spanish Executive Service of the Commission for the Prevention of Money Laundering and Monetary Crime, and the state security forces and bodies). Also, as a financial group, we must carry out a series of internal tasks of a purely administrative nature.

In all these instances, we will always process your data on one of the legitimate bases set out in law. For instance:

- In some cases we **need to do so to fulfil your contract** and provide the services you have requested; for example, when you have arranged a direct debit or have ordered a transfer.
- In other cases, such as when we have to send certain information to the Spanish Tax Agency or the Bank of Spain, it is **mandatory by law**.
- There are also occasions when your data is processed for **reasons of public interest**. This is the case with video surveillance cameras, which we use to prevent criminal activities.
- There are also situations in which **we both have a legitimate interest** in processing your data: for example, when you ask us a question or make a complaint, we need to use your contact details to be able to answer. Or we may want to internally evaluate the quality of the service we provide when you call us by telephone.
- There are certain exceptional circumstances in which the data processing of the data subject may be based on your **vital interest**, in a situation in which you are not able to give your consent. This could happen, for example, if you have a health emergency in one of our branches and it is essential to pass on your information to healthcare professionals for health reasons.
- Finally, the processing may also be justified simply because you have expressly given us **your permission**. For example, if you are not an Ibercaja customer but you would like to receive marketing information.

You can be reassured that we will always explain to you first why we are asking for your personal data, and the legal basis on which we want to process them.

4. Does anyone else access your personal data?

Generally speaking, the information you provide us will be processed by Ibercaja Banco S.A. We are the party legally responsible for their collection, use, conservation and, where legally necessary or requested, deletion.

Except for certain exceptions, your personal data will not be shared with any third party.

We may provide some of your data to third parties, but only where (1) it is required by law (for example, to the state security forces or the courts), (2) you have expressly authorised us, or (3) it is necessary to provide you with the service you have requested.

Apart from this, we want you to know that we collaborate with third-party service providers who, occasionally, may have access to your personal data. These may include IT services, security services or call center services.

In these cases, we will sign a contract with them imposing obligations that include appropriate security measures; processing the data you access solely and exclusively in accordance with our instructions, and deleting or returning them once their services are complete.

5. Can any of these third parties be in another country?

Under European legislation, data can only be provided to another company located outside the European Economic Area if certain safeguards are met. It therefore seeks to ensure that your data are always properly protected, irrespective of the location of the company that will use them.

Most commonly, it falls to the destination country to guarantee, in the opinion of the European Commission, an adequate level of privacy protection. There is a list of countries that guarantee this level of protection, which you can check by clicking [here](#).

If the company is located in another country that is not listed, this "International Data Transfer" can only take place if other measures are taken, such as signing clauses that the European Commission has envisaged for such cases.

In any case, it is very exceptional that we share your data with a company outside Europe. If we do, it will be in full compliance with the requirements of Spanish and European regulations.

6. What kind of personal information can we collect?

As established by law, we will only process the data that are essential for the purpose for which we have requested them. We will not ask you for data that are not aligned with such purpose, or that are excessive or disproportionate (*in the same way, we will not use them for a purpose other than that which we have told you*).

We may ask you for and process personal data of different categories, depending on why we have requested them. For example, if you ask us for a loan, we will need to examine more information about you than if you simply ask us for information on where you can find an ATM when you are travelling.

In broad terms, we can ask you for identification information (*name and surname, DNI/NIF/ID document, age/date and place of birth, nationality, address, signature, telephone number and contact email, marital status, activity sector*); information relating to your job (*company or organisation in which you work, position, address and professional contact details (telephone and email), academic and professional information, qualifications, training, seniority and professional experience*); economic and financial information (*bank details, details of your economic activity and solvency (income, assets, property, copy of tax returns for personal income tax, VAT, etc., and salary, amount of debt, family responsibilities, potential defaults, guarantees established, current level of risk, historical level of consumption)*); transaction details for goods and services (*transaction date, total amount, transaction subject, possible third-party guarantees*); data relating to personal characteristics (*sex, marital status, nationality, age, date and place of birth and family details, personal image, voice*); health information (*sick leave, work-related accidents, degree of disability, etc.*); Commercial information (*Data relating to commercial, economic-financial and transaction information for goods and services; profiling*); additional information (*Data collected in the operation or form concerned*); social circumstances (*data on personal characteristics, social, academic and professional circumstances, details of employment*).

7. Where do we collect your personal data from?

Broadly speaking, the data we process are what you have provided us.

If we receive them indirectly from third parties (such as a relative with whom you share a current account, your parents or guardians if you are a minor, or an official credit history database such as the Bank of Spain's CIRBE), we will tell you immediately (and always within one month). We may also receive information from advertising exclusion systems about your refusal to receive advertising.

8. How long will we hold on to your details?

At Ibercaja we will keep and use your personal data only for as long as strictly necessary. For this reason, once we have responded to your request, your contract with us has ended, or when you withdraw your authorisation, we will only keep them (duly sealed) in case they are requested by the authorities or courts, in case of any claim or complaint.

Please bear in mind that if you take out any of our financial products or services, there may be additional legal obligations (such as tax obligations or regarding anti-money laundering) that force us to keep your data for a longer period of time, after the contract you have signed with us has ended.

During the time when the data can be legally made available to public authorities or legal obligations or for the management of claims are required, your personal data will be sealed in our systems.

9. How do we protect the personal data you provide us?

At Ibercaja we have taken all technical and organisational measures required by data protection regulations to safeguard the integrity of your data, so that no one can change or delete them without your knowledge and consent. We have also established the appropriate measures to safeguard the confidentiality of your personal information, so that no one will use your data unless for the purposes indicated above.

We have established various procedures, protocols and internal rules to safeguard your privacy. Furthermore, our employees receive continuous training and are fully aware of the confidentiality obligations they must respect when using your personal data.

10. What rights do you have to protect your privacy?

By law, you have a series of rights, which you must know and you can exercise to protect your privacy. We refer mainly to:

1. Your right to confirm whether we are processing your personal data. If we are, you have a right to access them or part of them and, if you think they are inaccurate, you can ask that they be corrected or, where applicable, that they be deleted.
2. In certain circumstances, you may also request to restrict our use of your data, or even to oppose such use. In such a case, we will cease to use them, except for compelling legitimate reasons or the exercise or defence of possible claims.
3. If we create behaviour profiles (for example, to better understand your interests and needs by browsing our website) in a fully automated manner, you will have the right to be informed of this, to request the personal

intervention of any of our agents, to challenge any decision based on this profiling or simply to express your point of view on the decision taken.

4. You will also have the right to request the portability of the data you have provided, so that if you are interested, we will send them directly to you or a third party you indicate, in a structured, commonly used and machine-readable format.
5. Of course, if you have given us your permission to use your data for a special purpose, you have the right to withdraw it at any time (*although that will not affect the legality of what we have done so far*).
6. Finally, you can file a claim with Ibercaja or the Spanish Data Protection Agency (www.aepd.es). You may want to do so if you have exercised a right and we have not responded in the legally established terms.

11. How can you exercise your privacy rights?

You can exercise these privacy rights by email to dpo@ibercaja.es, by post to Ibercaja Banco, S.A. Plaza Basilio Paraiso, 2-50008-Zaragoza, in person at any of our branches, or using this form <https://www.ibercaja.es/forms/ejercicio-de-derechos/>.

For greater security, and to further strengthen your privacy, we will need you to send us a copy of your identification document. This will prevent anyone from impersonating you in order to change your details or illegally access them.

12. How can you find all the legal information on privacy in each specific instance?

In addition to this Data Protection Policy, we will use a “two-layer” system to provide you with all the legal information on privacy you require. This is provided for in Spanish Basic Law 3/2018, of 5 December, on Data Protection (“LOPD”), and by the Spanish Data Protection Agency.

Under this two-layer system, the legal information is provided to you in two layers, or levels:

- The “**first layer**” contains the basic and most important information: broadly speaking, the company that is requesting and will process your data, why they want them, how you can exercise your rights and, finally, how you can access and learn more about the legal information regarding the use of your data.
- The “**second layer**” contains all other legal information relating to privacy.

In line with the LOPD and the recommendations of the Spanish Data Protection Agency, we will facilitate the first layer when asking for your data: in the online form you fill in, or in the contract you sign (in a separate, clearly visible clause); if by telephone, via a recorded message at the start of the call; or by informative

posters located at the entrance of areas that are covered by video surveillance (such as in branches).

The second layer will be available to you at any time: on our website (www.ibercaja.es/privacidad), on request directly from any of our employees, or by email to dpo@ibercaja.es for us to send it to you.

13. *And if you are a customer?*

If you are a Ibercaja customer or are about to become one (because, for example, you have asked for a quote or any form of financing), you must know that, in addition to the Privacy Policy, we will detail the legal conditions of data processing in the documents we give you.

For example, when you are taking out one of our products, your advisor will inform you of certain checks we are required by law to carry out to ascertain your solvency and credit risk, or under what conditions we can send you marketing and promotional information.

Similarly, when you use any of our applications, you will be able to consult the corresponding privacy conditions before downloading. They will be essentially the same as these, although perhaps with certain tweaks due to being tools through which you interact with us, through your mobile device.

14. *And when browsing Ibercaja websites?*

When you browse our websites, we may collect information from you through "Cookies". Cookies allow us to better understand your browsing habits online and offer you personalized service, wherever you allow us.

The website contains a Cookies Policy section, which contains all legal information about them. You can find out more by clicking [here](#).