

PERSONAL DATA PROTECTION POLICY

The present policy shall be applicable to the personal data provided by CLIENTS of BANCO INVERISIS, as well as any other data which may be generated or come to be known in the course of the business or contractual relationship. In said regard, CLIENTS shall be those parties to any type of contract formalised with BANCO INVERISIS.

1. NAME OF DATA CONTROLLER

The controller of the personal data provided is Banco Inversis, S. A. (hereinafter, "INVERISIS"), a banking institution subject to the supervision of the Bank of Spain and the Spanish Securities Commission, and recorded in the Official Register of Banks under number 0232, BIC Code: INVLESMM.INVERISIS, with Tax ID number A- 83131433; the entity is recorded in the Madrid Companies Register in volume 17,018, Folio 69, Section 8th, Page M-291233. Its registered office is located in the building "Plaza Aeropuerto", at Avda. de la Hispanidad 6, 28042, Madrid.

2. DATA PROTECTION OFFICER

You can contact our Data Protection Officer at the following address: dpo@inversis.com

3. PURPOSE OF PROCESSING YOUR PERSONAL DATA

The personal data requested will be processed principally for the purpose of executing the signed contract under the terms stipulated in the general and specific conditions thereof, and is deemed to be data which are mandatory and necessary for the successful outcome of the master service provider contract and financial products.

The data will be kept for as long as necessary for the aforementioned purpose, and in accordance with the data retention terms established by the laws in force. Once the data cease to be used, they will be blocked, and will remain at the disposal of public administrations, judges, and courts in an aim to determine any possible liabilities which may result from the contract execution.

Likewise, INVERISIS will process your personal data based on its own legitimate interest for other purposes in addition to those mentioned above, as detailed below:

1. Within its activity INVERISIS may transfer your data to companies in the group, or to other companies which are currently or in the future will be related to INVERISIS, either because they form part of the group or owing to commercial collaboration agreements with INVERISIS.



2. INVERSIS may process your data for the purpose of verifying the correct application of pre-contract offers or conditions, client risk control and fraud control. INVERSIS will request any type of information or will consult with the Bank of Spain's Risk Information Centre (CIR) as well as with any other risk information source. The risk holder declared to the CIR may exercise the rights to access, rectification and cancellation under the terms established by law, by means of a written statement addressed to the Bank of Spain, at calle Alcalá, 50, 28014-Madrid.

INVERSIS may process and retain the personal data of the client for the purpose of preventing fraud in the application of contractual or promotional measures. The personal data will be retained for as long as necessary in order to make the pertinent verifications, after which time said data will be erased.

3. During the contracting process, INVERSIS may process the personal data provided by the CLIENT in order to prepare profiles in accordance with the laws in force. The personal data will be kept for as long as necessary in order to prepare said profiles, after which time said data will be erased.
4. The personal data provided by the client through the communication and customer service channels enabled by INVERSIS will be processed for the purpose of attending complaints, suggestions and claims, and will be kept for the legally stipulated time periods, after which time said data will be erased.
5. Orders placed by CLIENTS by phone, in execution of a contract in force signed with INVERSIS, will be recorded and kept for the duration of the contract and during a minimum of 5 years, with both parties recognising the probative value of said recordings in any judicial or other type of proceeding between both parties which may be given rise to, either directly or indirectly, notwithstanding any other means of proof admissible in law.

Furthermore, we request your consent to send you commercial communications related to goods and services of interest to you, as well as services of third-party companies related either through commercial collaboration agreements or given that they belong to the same economic group. Said communications may be sent by electronic means, pursuant to the Law of Information Society Services and Electronic Commerce.

- I consent to the processing of my personal data for the sending of commercial communications.

4. LEGITIMATION OF PERSONAL DATA PROCESSING

The processing of personal data by INVERSIS is carried out as a result of compliance with legal obligations, the legitimate interest of INVERSIS and the free consent of the affected party, which is to be expressly and explicitly stated through the channels enabled by INVERSIS for said purpose. CLIENT consent to the processing and transfer of the CLIENT'S data for purposes not directly related to the maintenance, development or control of the contractual relationship may be revoked, and is not retroactive.

In line with the above, the ID data of the signatories, references to their professional activity, as well as expressly stipulated mandatory contact data and any other data which may be required by applicable regulations, are mandatory, and any refusal to provide such data will entail the impossibility of entering into the contract or of contracting a given product or service.

Moreover, in an aim to effectively and correctly carry out its activity, INVERSIS reserves the right to process the personal data of which it is the controller for the protection of its legitimate interests, including among such interests the determination of possible liabilities which may arise as a consequence of its activity, and likewise to guarantee proper service to the interested parties.

Likewise, INVERSIS shall have the power to process and retain the personal data of the client for compliance with any applicable legal obligations.

The CLIENT undertakes to provide correct, truthful and up-to-date information regarding the CLIENT'S situation.

5. PERSONAL DATA RECIPIENTS

Below, information is provided to the client regarding the personal data communications and transfers which INVERSIS BANCO may make:

1. Clients are informed that in compliance with current regulation on the prevention of money laundering and terrorist financing, INVERSIS is required to declare to the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences (SEBPLAC) the opening or cancellation of any current accounts, savings accounts, securities accounts or time deposits, regardless of their commercial name. In all cases, the declaration is to include the data identifying the account holders, beneficial owners, and, if applicable, representatives or authorised persons, as well as of any other persons having power of attorney for withdrawal, the opening or cancellation date, and the type of account or deposit (the communication does not include balances). Said information will be sent monthly to the Executive Service of the Secretariat of State for Economy and Business Support. The client is likewise informed that, in compliance with said laws, INVERSIS may request documentation accrediting the origin and use of the funds prior to carrying out any transactions, in which case, should the client fail to provide



said documentation, or should INVERSIS determine, after analysing the documentation, that this does not conform to the internal policies and procedures of INVERSIS, the latter may choose not to execute the transaction in question. In addition to the above, in the case where the client, when called upon to do so, should fail to provide INVERSIS with additional information regarding the client's identity, the origin of the client's deposits or any other information in regard to the verification tasks assigned to the entity with respect to the prevention of money laundering, INVERSIS shall proceed to block the account for additional transactions, and shall subsequently cancel said account.

2. INVERSIS may communicate the data regarding transactions carried out by US citizens to the Control and/or Regulatory Authorities of the United States of America, in compliance with the established tax obligations.
3. INVERSIS, may communicate to the Public Administration and other jurisdictional bodies any personal data which it is called upon to provide, in compliance with the regulatory obligations in force.
4. INVERSIS, in the context of its financial activity, and in compliance with the legal obligations established in said regard, may inform the Supervisory and Control Authorities (Bank of Spain, Spanish Securities Commission, etc.) of the transactions carried out by its CLIENTS.
5. INVERSIS, in compliance with the regulations established in said regard, shall communicate, when this is deemed advisable, information regarding loan/credit/guarantee operations formalised by the CLIENT, to the Bank of Spain's Risk Information Centre (CIR) as well as to any other risk information source. The risk holder declared to the CIR may exercise the rights to access, rectification and cancellation under the terms established by law, by means of a written statement addressed to the Bank of Spain, at calle Alcalá, 50, 28014-Madrid.
6. INVERSIS, may communicate to asset solvency files information regarding breach of monetary obligations by its CLIENTS, in accordance with the legally established requirements and conditions.
7. INVERSIS may communicate CLIENT data to service providers and third parties with which it is contractually bound, by reason of a service provider contract, for the exclusive purpose of formalising and carrying out the master contract for financial products and services.



8. Finally, in the event that the services and products require the intervention of an Introducing Broker, INVERSIS, in its own legitimate interest and for the control and execution of the services contract, will communicate the necessary personal data to the designated Introducing Broker.

6. EXERCISE OF RIGHTS BY THE AFFECTED PERSONS

We inform you that at any time you may exercise your rights to access, rectification, erasure, portability, objection, processing restriction or not to be subject to automated decision-making by the Data Controller, by sending a written statement to the following postal address: at Avda. de la Hispanidad 6, 28042, Madrid or email address: protecciondedatos@inversis.com

We remind you that said communication is to indicate the right you wish to exercise, the data or series of personal data which is the object of your claim, and is to include a valid ID document.

In relation to any doubt or claim regarding the processing of your personal data, please contact our Data Protection Officer, through the email address:

Lastly, we inform you that you have the right to file a claim with the Spanish Data Protection Agency, as the control authority. www.agpd.es