

## DATA PROTECTION POLICY

This policy shall be applicable to personal data provided to BANCO INVERISIS, through the channels provided for this purpose by clients, as well by potential clients and third parties with whom BANCO INVERISIS has a relationship.

### 1. CONFIDENTIALITY AND APPLICABLE SECURITY MEASURES.

The personal data provided shall be treated by BANCO INVERISIS with absolute confidentiality, in a loyal and transparent manner, in accordance with the laws in force at all times, undertaking to keep them secret, as well as to adopt the necessary measures to prevent their alteration, loss and unauthorized processing or access. To comply this, BANCO INVERISIS has the strictest security procedures and measures necessary to protect personal data, consistent with the state of technology, the nature of the data stored and the risks to which they are exposed.

### 2. IDENTITY OF THE CONTROLLER.

The party responsible for the processing of the personal data provided is Banco Inversis, S.A. (hereinafter, "INVERISIS"). It is a banking institution subject to the supervision of the Bank of Spain and the National Securities Market Commission and registered in the Official Register of Banks under number 0232. BIC code: INVLESMM. INVERISIS, with Tax code Number A-83131433, is registered in the Mercantile Registry of Madrid in volume 17,018, File 69, Section 8, Page M-291233. Its registered office is located at Avda. de la Hispanidad 6, 28042, Madrid.

Notwithstanding the foregoing, INVERISIS may process the personal data not only as controller, but also as processor, when acting on behalf of third parties who hold such status and with whom it has signed the corresponding data processing agreement. In this case, INVERISIS shall process the personal data to which it may have access, in accordance with the instructions of the controller, and in all cases in compliance with the data protection regulations in force, adopting the security and privacy measures defined by the controller to guarantee the confidentiality and privacy of the data.

### 3. DATA PROTECTION OFFICER.

The Data Protection Officer (DPO) is the person designated by INVERISIS to protect your privacy and attend to all matters relating to the protection of personal data. You can contact our DPO through the following channels:

- E-mail: [dpo@inversis.com](mailto:dpo@inversis.com).
- Postal address: Banco Inversis, Avenida de la Hispanidad N° 6, Madrid (28042).

#### 4. CATEGORIES OF PERSONAL DATA

Personal Data processed by INVERISIS are obtained directly, unless it acts as data processor, in which case, INVERISIS receives the personal data by the controller and processes the personal data only on documented instructions from the controller.

INVERISIS may process any of the following types of personal data:

- Identification data (name, surname, image, voice, etc.).
- Location and contact details (postal address, email, telephone, etc.).
- Professional and employment information (CV, academic background, company, position, telephone and professional contact, etc.).
- Economic, tax and financial data (Data pertaining to the contracting of specific services or products, including banking, financial, and transactional data; Details of bank or securities accounts, credit card numbers, cash transfers, available assets, investor profiles; Data regarding payments made with cards and, specifically, the location(s) of cash withdrawals and card payment)

The personal data provided by the interested parties are understood to be accurate and truthful, and it is the responsibility of the interested parties to notify INVERISIS immediately of any modification.

#### 5. PURPOSE, BASIS OF LEGITIMATION OF THE PROCESSING OF PERSONAL DATA AND RETENTION PERIOD.

INVERISIS will process the Personal Data of its clients for the following purposes:

##### 5.1 Data processing on the basis of the (pre)contractual relationship.

The Data Controller will process any personal data where processing is necessary to fulfil the obligations assumed and for the correct execution and development of the contractual relationship.

The personal data provided by the data subject will be retained for the duration of the contractual relationship and, once this period is finished, until the legally stipulated period of limitation of actions has expired.

##### 5.2 Data processing to comply with a legal obligation.

The Data Controller will process the personal data provided to comply with the legal obligations that may be required of it and, specifically, to:

- Incorporate them into the INVERISIS databases, to be able to duly identify the data subject, to comply with applicable tax and sectorial obligations.
- Communicate personal data to the Authorities and Regulatory Bodies, including the Bank of Spain, the National Securities Market Commission, the Spanish Tax Agency, the Executive Service for the Prevention of Money Laundering and Monetary Offences (SEBPLAC), etc., in accordance with the applicable law (Prevention of Money Laundering Act, Banking Regulation and Supervision Act, etc.) and others of an accounting, commercial, tax and administrative nature.
- Handling complaints and claims made to the Controller, in accordance with the applicable sectorial regulations.
- Exercise of the right of defense in judicial and extrajudicial proceedings initiated by INVERISIS or promoted by it.

- Management and resolution of complaints submitted through the channels provided by INVERISIS.
- Attention of requirements addressed by Security Forces and Corps, competent Public Administrations and Courts and Tribunals.

The personal data provided shall be stored for the legal period foreseen in each case and, once this period has expired, the data shall be securely deleted.

### **5.3 The legitimate interest of INVERISIS.**

Legitimate interest is a legal basis that allows the processing of personal data by the Controller as long as the interests or the rights and freedoms of those affected by it do not prevail, taking into account their reasonable expectations with respect to the relationship with the Controller. Taking this into account, INVERISIS has analyzed the processing of personal data indicated below, having considered that it falls within the reasonable expectations of the data subjects, without infringing their rights and freedoms. In any case, and in accordance with current data protection legislation, the data subject may exercise the right to object these processing operations by sending an email to [protecciondedatos@inversis.com](mailto:protecciondedatos@inversis.com) or by requesting additional information from our Data Protection Officer, by contacting the address indicated above.

- Consultation of personal data of those affected in consumer information files, to monitor risk control and fraud detection, under the requirements and legal guarantees in force.
- Communication of data to solvency files, when the legally foreseen requirements are met, in situations of non-payment or debt.
- Communication of personal data, when necessary, to other group entities for internal administrative purposes.
- Capture and recording images through video surveillance systems located in INVERISIS facilities, to guarantee the protection of people and assets. These recordings will be kept in custody for a maximum legal period of thirty days.
- Recording of telephone calls to be able to accredit the correct execution of the orders and transactions agreed.
- Processing of the data of representatives and contact persons of organizations contractually linked to INVERISIS, as well as of professionals to establish and maintain a business relationship.

The personal data processed shall be preserved for the periods established to comply with the applicable legal obligations and, in the absence of this, for the time required to fulfil the purpose for which they were collected; after that time, they shall be securely deleted.

### **5.4 Data processing based on the consent of INVERISIS.**

The Data Controller may request the consent of the data subject to carry out those personal data processing operations that so require, among others, the sending of commercial communications, when there is no other legitimate reason for doing so, activities to promote its image or brand or its inclusion in the INVERISIS databases for selection processes, for which purpose, you will be specifically informed, requesting your consent, which may be withdrawn at any time, through the channels provided for this purpose, in each case, or failing this, by sending an e-mail to [protecciondedatos@inversis.com](mailto:protecciondedatos@inversis.com).

The personal data provided will be stored for the period necessary to fulfil the aforementioned purposes or until the withdrawal of your consent. After that time, they will be securely deleted.

## **6. RECIPIENTS OF THE PERSONAL DATA.**

We may share the personal information we collect from and about you with:

- Competent authorities (including any national and/or international regulatory or enforcement body, agency, court or other form of tribunal or tax authority), for compliance with a legal obligation to which the controller is subject or official request.
- Supervisory and/or Regulatory Authorities of the United States of America, in compliance with the tax obligations established. In particular, we may disclose information relating to transactions carried out by US citizens.
- Service providers and third parties with which it is contractually bound (including, where applicable, the regulated Independent Collaborator) by virtue of a service agreement for the sole purpose of being able to formalize and carry out the obligations assumed by INVERSIS with the data subject.

## **7. TRANSFERS OF DATA.**

In the course of our business activities, INVERSIS may transfer personal data to a third party located outside the European Economic Area (EEA) necessary for the proper performance of its services. Inversis transfers personal data to third countries declared as offering an adequate level of protection through a European Commission decision ('Adequacy Decision'), or in the absence of an Adequacy Decision, through the provision of appropriate safeguards, such as standard data protection clauses adopted by the Commission. If data transfer is not covered by an 'adequacy decision' or the appropriate safeguards, Inversis must conduct analyses of the transfer data to determine whether it is covered by exceptions set out in Article 49 of the GDPR.

## **8. RIGHTS OF THE INTERESTED PARTIES.**

The data subject shall have the right to withdraw his or her consent at any time, as well as to exercise the following rights before the Controller:

- Right to access: Right to obtain access to the personal data held about you.
- Right to rectification: Right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
- Right to erasure: Right to request that personal data be erased when it's no longer needed or if processing it is unlawful.
- Right to data portability: Right to receive your personal data in a machine-readable format and send it to another controller.
- Right to object: If the data is processed for the performance of a task carried out for reasons of public interest, in the exercise of official authority or for the purposes of the compelling legitimate interests pursued by the controller or a third party, the data subject has the right to object to the processing on grounds relating to his or her particular situation.
- Right to restriction of processing: The data subject can request the controller to restrict the processing of personal data concerning him or her.
- Right not to be subject to a decision based solely on automated processing: The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.



To exercise your rights, you should contact us by sending written correspondence to the following email address: [protecciondedatos@inversis.com](mailto:protecciondedatos@inversis.com), indicating the right to exercise, the processing of personal data concerning you, accompanied by a copy of the ID card. For any queries or complaints regarding the processing of personal data, you may contact our Data Protection Officer at the e-mail address provided above.

Finally, we hereby inform you that you can contact the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)) and other competent public bodies for any claim derived from the processing of your personal data.