

## ***Privacy Principles at the Ibercaja Group***

This document on Privacy Principles, which we recommend you read carefully, aims to provide you with general information on how we process your personal data in the various companies that comprise the Ibercaja Group covered by the Corporate Data Protection Officer's field of action (hereinafter, "Group" or "Ibercaja"), the details of which can be found [here](http://www.ibercaja.es/proteccion-datos/dpo-corporativo-eng/) (www.ibercaja.es/proteccion-datos/dpo-corporativo-eng/).

The firm commitment by Ibercaja regarding fundamental rights, and our social responsibility, entails that in the establishment as a basic principle of our business activity, we inform you at all times (unless a legal obligation prevents us from doing so), when and how we will process your personal data, the purpose and lawful basis for which we want to use it, whether anyone else will have access to it, and the various rights available to you and how you can exercise them.

Therefore, whenever we ask you to provide any personal data, we will inform you in detail of all this before we collect and process it. Similarly, when a third party provides us with your personal data, among other aspects, we will inform you that we are processing your data, the party who has provided it to us, and for what purpose. We are doing this to ensure that you are fully aware of the legal conditions under which your data will be processed.

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

Firstly, when we ask for your personal data, or when we receive it from a third party, we will inform you of the company legally responsible for its processing.

In general, this will be the financial institution «Ibercaja Banco S.A.» with registered office in Zaragoza, Plaza Paraíso no 2, 50008 Zaragoza.

However, as Ibercaja is part of a larger Group, any of these companies may act as data controller when you engage with them. However, as indicated above, we will inform you at all times on which company is legally responsible.

### ***2. Who is the Ibercaja Data Protection Officer?***

Ibercaja has appointed a person to protect your personal data, and who will protect your privacy, this way guaranteeing that we comply with the various legal

requirements contained in Spanish and European personal data protection regulations.

This person is the Data Protection Officer, who will be responsible for providing you with all the information you may need concerning Data Protection and, if you should need further information, you may contact by email at the following address: [dpo@ibercaja.es](mailto:dpo@ibercaja.es).

With regard to companies affiliated to the Group for which we have determined a specific email address, this will be provided to you in accordance with the provisions of section [«12.How can you be informed of all the information regarding Data Protection for each company in the Group?»](#). We will, however, attend to all requests and communications sent to us at the email address [dpo@ibercaja.es](mailto:dpo@ibercaja.es)

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

Due to the variety of activities carried out by each company affiliated to the Group, Ibercaja may collect and process your personal data for different purposes. Here is an example of how we process data in different companies of the Group, and the purpose of this data processing.

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 contact our telephone service, we may need it to respond to any queries or claims you may have. Likewise, if you send us your CV as part of a recruitment process, we will need it to assess your candidate request.

For security purposes, we also have video surveillance systems in some of our branches, which capture images of people who enter them. As such, if you visit any «Ibercaja Banco, S.A.» branch, we may record your image.

Moreover, as a Financial group, there are a series of legal obligations that we must comply with, and with respect to which we need to process personal data. In this respect, this includes details of the obligations we must meet with the Spanish Tax Agency, the Spanish Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences, and the State Security Bodies. Also, as a financial group, we must carry out a series of internal tasks of a purely administrative nature.

In all these instances, and any others, we will always process your data in accordance with one of the lawful bases established in the current regulations:

- In some cases **we need to do so to implement pre-contractual measures and for the performance of your contract**, and to provide the services you have requested. For example, when you have arranged a direct debit or have ordered a transfer.
- In other cases, because it is **mandatory by law**. In this respect, this includes our obligation to send certain information to the Spanish Tax Agency or the Bank of Spain.
- There are also circumstances 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 make a query, we need to use your contact details to be able to answer; or when we want to carry out an internal quality assurance of the service we provide when you phone our *call center*.
- 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.
- The data processing may also be justified simply because you have expressly given us **your consent**. For example, if you are not an Ibercaja customer, but you would like to receive marketing information.

Whichever the case, we remind you that we will always inform you of which company in the Group is responsible for data processing, and the purpose for which we will process your personal data, and the lawful bases for this processing.

#### ***4. Does anyone else access your personal data?***

Your data will be processed only by the specific company of the Group to which it has been provided. This company, the identity of which we will inform you, is the party legally responsible for its collection, use, conservation and, where legally necessary or requested, its deletion.

In view of the above, as a general rule, we will not share your personal data with any third party. However, sometimes we will provide your data to third parties, but only when (i) it is required by law (for example, to the State Security Forces or appropriate Courts of Law), (ii) you have expressly authorised this, or (iii) it is required to carry out internal administrative procedures (among the companies affiliated to the Group).

Apart from this, you should 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 centre* services.

In these cases, we will sign a contract with these providers, imposing obligations that include their obligation to implement appropriate security measures, to process the personal data to which they have exclusive access strictly in accordance with our instructions, and to delete it or return it once their services have terminated.

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

European legislation on Data Protection states that personal 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 personal data is always properly protected, irrespective of the location of the company that will use it.

Most commonly, and according to the European Commission, it is the responsibility of the destination country to guarantee the proper level of data protection. There is a list of countries that guarantee this level of data protection, details of which you will find on the [website of the Spanish Data Protection Agency](#).

If the company is located in another country that is not included in this list, "International Data Transfer" can only take place if other measures envisaged in the regulations are carried out. For these purposes, this includes the signing of standard clauses (Standard Contractual Clauses) approved by the European Commission for these cases.

However, Ibercaja will only share your personal data with a company located outside the European Economic Area in exceptional cases; and if so, this shall be in full compliance with the requirements of Spanish and European regulations.

## 6. What kind of personal data can we collect?

As established by law, Ibercaja will comply with data minimisation principle, ie, we will collect the minimum amount of personal data that we need to deliver an individual element. Therefore, we will not ask you for data that is not required for this purpose, or which is excessive or disproportionate.

We may also ask you for, and process, personal data of different categories, depending on the reason why we have requested it, or when it has been provided by a third party (as mentioned above, unless prohibited by law, you will always be informed). For example, if you apply for a loan, we will need more information about you than if you simply ask us for information on where you can find an ATM when you are travelling.

In general, Ibercaja can collect and process the following data categories:

- Identification data: full name, DNI/NIE/Passport, nationality, signature, marital status, activity sector, personal image and voice.
- Contact details: Telephone number, email address and postal address.
- Details relating to your job: sector of activity, company or organisation in which you work, your position, address and professional contact details (telephone and email), academic and professional information, qualifications, training, seniority and professional experience.
- Economic-financial data: 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).
- Details of transactions for goods and services: transaction date, total amount, transaction subject, possible third-party guarantees.
- Details relating to personal characteristics: gender, marital status, nationality, age, date and place of birth and family details.
- Health information: sick leave, work-related accidents, degree of disability.

The data we have identified in each category are illustrative, and are not exhaustive. At all times, depending on your relationship with Ibercaja (customer, candidate or collaborator, among others), we will provide you with additional information,

specifying the personal data we will process about you, as well as the purposes pursued.

### ***7. Where do we collect your personal data from?***

The main source of the personal data we process in the Group's companies is the data subject, i.e. we will, as a general rule, process the data you have provided to us. However, in the course of and development of the relationship you maintain with each company, we may also generate personal data about you.

If, exceptionally, we receive your data indirectly, ie, from a third party which who you are going to share a product, or an official data system, such as the Banco de España Risk Information Centre (CIRBE), and unless a legal obligation prohibits this, we will always inform you of this within the period of one month, and ensure that you are fully aware of this.

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

Ibercaja will keep and use your personal data for as long as is necessary for the purposes with which it was collected, in compliance with the principal of GDPR statutory retention periods.

However, please be informed that each company of the Group with which you maintain relations, in its capacity as data processor, once your business relationship or the purpose for which your data was collected has terminated, will store your personal data, duly blocked, before deleting it, to comply with any legal obligations that may be required of it during the periods imposed in each case by the applicable regulations, and to handle any potential complaints and make it available to the competent authorities, during the statutory limitation periods.

In these cases, Ibercaja will adopt the technical and organisational measures needed to guarantee that they are only used for this purpose.

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

The protection of your personal data is one of our top priorities and a basic principle that presides over all our actions. For this reason, Ibercaja takes all technical and organisational measures required by data protection regulations to safeguard the integrity of your data, ie, guaranteeing that it cannot be changed or deleted without

your knowledge and consent, the confidentiality, to ensure that no one can access or use your personal data, and its availability.

Thus, the entire organisation has 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.

We also want to inform you that we are aware of the current changing context, and that Ibercaja continuously monitors any new measures implemented, updating and reinforcing them whenever necessary to guarantee the protection of your data against any new threats that may arise.

### ***10. What rights do you have under the personal data protection regulations?***

The Personal Data Protection regulations recognise a set of rights that you should know and you can exercise to protect your Privacy and control how your personal data is used in each company of the Group with which you have a relationship. We refer in particular to:

1. You have the right to obtain confirmation on whether we are processing your personal data or not; and if so, to access this data, as well as to request that inaccurate data be corrected, or to request your data be deleted when, among other reasons, the data is no longer necessary for the purposes for which it were collected.
2. Your right to request, in specific circumstances, that the processing of your data be limited.
3. Your right to oppose the processing of your data, in certain cases, and for reasons related to your particular circumstances, as well as in situations in which each company of the Group processes your data for our legitimate interest. In such a case, Ibercaja will stop processing them, except under compelling legitimate grounds, or for the exercise or defence of potential claims.
4. You may also request the portability of your data in structured, commonly used and machine-readable formats.
5. Your right to withdraw at any time your consent, whenever you wish, and without your doing so in any way impeding or harming your status as a

customer of the corresponding company of the Ibercaja Group. However, withdrawing your consent takes effect from that moment on, meaning it has no effect on any processing carried out up to that point.

6. Your right not to be subject to automated individual decisions, including the creation of profiles that produce legal effects or significantly affect you in a similar way. In this regard, we will inform you of the fully automated processing we carry out, to allow you to request human intervention, express your point of view, and appeal against decisions.

Finally, you can also file a claim with each company of the Group and/or the Spanish Data Protection Agency (as the competent Supervisory Authority with regard to data protection), especially if you are dissatisfied with the outcome of the exercise of your rights, in writing to [dpo@ibercaja.es](mailto:dpo@ibercaja.es) or via the website [www.aepd.es](http://www.aepd.es).

### ***11. How can you exercise your rights to the Protection of your Personal Data?***

Ibercaja provides you with different means through which you can exercise your rights of Personal Data Protection in each company of the Group with which you have a relationship:

- (i) A letter addressed to the Ibercaja Data Protection Officer (Plaza de Basilio Paraíso 2 - 50008, Zaragoza)
- (ii) An email addressed to the Corporate Data Protection Officer at the address provided and communicated for each company of the Group, in accordance with the provisions of section [\*«12.How can you be informed of all the information on Data Protection for each company in the Group?»\*](#), and by default [dpo@ibercaja.es](mailto:dpo@ibercaja.es)
- (iii) Website Form How to Exercise your Rights as a Data Subject, provided and communicated for each company in the Group, in accordance with the provisions of section [\*«12.How can you be informed of all the information regarding Data Protection for each company in the Group?»\*](#), in general at [www.ibercaja.es/forms/ejercicio-de-derechos](http://www.ibercaja.es/forms/ejercicio-de-derechos)
- (iv) Website Form How to Exercise your Rights as a Data Subject available in applications and online services contracted with companies in the Group, in general, in Digital Banking.
- (v) Request in person at any branch of the «Ibercaja Banco S.A.» network.



In this regard, for security purposes, given the sensitivity of the information that is the responsibility or in custody of the different companies of the Group, depending on the means by which you submit your request, we may require you to verify your identity by presenting a copy of your National Identity Document or equivalent official document. This way, we can improve the protection of your personal data, and prevent third parties from impersonating you identity in order to illicitly access or change your data.

## **12. How can you be informed of all the information regarding Data Protection for each company in the Group?**

In order to provide you with full information on the processing of your personal data, Ibercaja uses a system called «double layer», provided for in *Organic Law 3/2018 of 5 December, on Personal Data Protection and Digital Rights*», and the Spanish Data Protection Agency.

This system, designed to improve the transparency and accessibility of information, consists of all the conditions on the processing of your personal data being provided at two layers:

- The "**first layer**" contains the basic and most important information. Usually, the name of the company responsible for the processing of your data, the purpose of the processing, 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.

In line with the aforementioned Organic Law 3/2018, and the recommendations of the Spanish Data Protection Agency, the first layer will be provided, independently and clearly visible, when we are collecting your data. For example, (i) in a clause in the online form you are going to fill in, or in the contract you are going to sign, (ii) via a recorded message at the start of a phone call; or (iii) by notices at the entrance of areas covered by video surveillance.

- As a complement to the previous, a "**second layer**" contains all other legal information required by Data Protection regulations.

The second layer corresponding to each company you interact with, and also relating to the condition under which you are acting in your relationship with it (for example, the status of customer, collaborator or employee), will always be available, which you can access at any time, by following the instructions indicated in each case in the first layer, as a general rule by accessing the URL of the Group.

You may request it at any time directly from the Corporate Data Protection Officer by email to [dpo@ibercaja.es](mailto:dpo@ibercaja.es), and we will send it to you.

### ***13. How can I obtain the information if I am a customer?***

If you are a customer of a company in the Group, or you are in the process of signing up for the first time, ie, in the process of becoming a new customer, in the pre-contractual or contractual documentation to be signed, we will detail the basic conditions (first layer) in which we will process your data, as well as how to access the remaining additional information (second layer).

Similarly, when you use any of our mobile applications, you will be able to consult the corresponding Data Protection conditions of the pertinent company of the Group before downloading. This information will also be available to you in a specific section accessible within the application itself.

### ***Document update***

Ibercaja reviews and keeps this document on the Principles of Action in Privacy permanently updated. For this reason, we recommend that you review it regularly.

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