PERSONAL DATA PROTECTION POLICY

This policy will be applicable to the personal data provided to BANCO INVERSIS, through the dedicated channels, by customers, prospects and third parties that have a relationship with BANCO INVERSIS.

1. CONFIDENTIALITY AND APPLICABLE SECURITY MEASURES.

The personal data provided will be processed by BANCO INVERSIS with absolute confidentiality, in a loyal and transparent manner, in accordance with the laws in force at all times, and INVERSIS undertakes to keep such data secret, as well as to adopt the necessary measures to prevent its alteration, loss and unauthorised processing or access.

To this end, BANCO INVERSIS has the strictest procedures and security measures in place to protect personal data, taking into account the state of technology, the nature of the data stored and the risks to which it is exposed.

2. IDENTITY OF THE DATA CONTROLLER.

The Data Controller of the personal data provided is Banco Inversis, S.A. (hereinafter, "BANCO INVERSIS"). BANCO INVERSIS is a bank 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. INVERSIS, with CIF nº A- 83131433, is registered in the Mercantile Registry of Madrid in volume 17,018, Folio 69, Section 8 and Page M-291233. Its registered office is located in the "Plaza Aeropuerto" building, Avenida de la Hispanidad 6, 28042, Madrid.

Notwithstanding the foregoing, BANCO INVERSIS may process the personal data of the data subjects, not only as the Data Controller, but also as the data processor, when acting on behalf of third parties, who hold this status and with whom it has signed the corresponding data processing agreement. In this case, BANCO INVERSIS will process the personal data to which it may have access, in accordance with the instructions of the Data Controller and, in any case, in compliance with current regulations on data protection, adopting the security and privacy measures established by the Data Controller to guarantee the confidentiality and privacy of those affected.

3. DATA PROTECTION OFFICER.

The Data Protection Officer (DPO) is the person appointed by INVERSIS to protect your privacy and deal with all issues relating to the protection of personal data. You can contact our DPO through the following channels:

- E-mail: dpo@inversis.com.
- Postal address: BANCO INVERSIS, Avenida de la hispanidad nº 6, Madrid (28042).

4. CATEGORIES OF DATA SUBJECT TO PROCESSING.

The personal data processed by BANCO INVERSIS is collected by BANCO INVERSIS directly, unless it acts in the capacity of data processor. In such a case, the data is communicated by the Data Controller and processed in accordance with its instructions.

BANCO INVERSIS processes the following categories of personal data:

- Identification data
- Location and contact details
- Professional and Employment Data
- Economic, tax and financial data

The personal data provided by the data subjects is understood to be accurate and truthful and it is their responsibility to communicate any modification to BANCO INVERSIS immediately.

5. PURPOSE, LEGAL GROUNDS AND STORAGE PERIOD OF PERSONAL DATA.

The personal data provided will be processed for the purposes indicated below and in accordance with the legal basis and period that is also expressed:

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

The Data Controller will carry out any data processing needed to meet the obligations assumed as well as for the proper execution and development of the contractual relationship.

The personal data provided will be kept for the duration of the (pre)contractual relationship and, once it has ended, until the legally established limitation period for actions has expired.

5.2 Data processing necessary to comply with the legal obligations of the Data Controller.

The Data Controller will process the personal data provided in order to comply with its legal obligations as required, and specifically to:

- Incorporate the data into BANCO INVERSIS' databases, to duly identify the data subject, and in order to comply with the applicable tax and sectoral obligations.

- Communicate personal data to the Regulatory Authorities and Bodies, including the Bank of Spain, the National Securities Market Commission, the State Tax Administration Agency, the Executive Service for the Prevention of Money Laundering and Monetary Offences (SEBPLAC) etc., in accordance with the applicable sectoral regulations (Law on the Prevention of Money Laundering, Law on Banking Regulation and Supervision, etc.) and other accounting, commercial, fiscal, and administrative regulations.

- Management of complaints and claims filed with the Data Controller, in accordance with the applicable sectoral regulations.

- Exercise of the right of defence in judicial and extrajudicial proceedings brought by INVERSIS or promoted by it.

- Management and resolution of complaints submitted through the channels enabled by INVERSIS.

- Response to requirements issued by Security Forces and Bodies, competent Public Administrations and Courts and Tribunals.

The personal data provided will be kept for the legal period provided for in each case and, once this period has ended, it will be deleted, in a secure manner.

5.3 Data processing on the basis of the legitimate interest of the Data Controller.

Legitimate interest is a legal basis that allows the processing of personal data by the Data Controller providing that the interests or rights and freedoms of those affected by the data processing do not prevail, taking into account their reasonable expectations regarding the relationship with the Data Controller. Following from the above, BANCO INVERSIS has analysed the processing listed below, and considered that the processing is within the reasonable expectations of the affected parties, without this violating their rights and freedoms. In any case and in accordance with current data protection regulations, the data subject may exercise their right to object to the processing, by email to protecciondedatos@inversis.com or request additional information thereon from our Data Protection Officer, at the address indicated above.

- Consultation of personal data of the affected parties in credit information files, in order to carry out the necessary checks, for risk control and fraud detection, under the requirements and legal guarantees in force.

- Communication of data to credit records, when the legally established requirements are met, in situations of non-payment or debt.

- Communications of personal data, when necessary, to other entities of the group, for internal administrative purposes.

- Capture and recording of images through video surveillance systems located in INVERSIS facilities, in order to guarantee the safety of people and property. These recordings will be retained for a maximum legal period of thirty days.

- Recording of telephone calls in order to verify the correct execution of the orders and transactions agreed.

- Processing of contact and professional data of representatives of organisations contractually linked to INVERSIS, as well as of individual entrepreneurs in order to maintain and develop said business and/or commercial relationship.

The personal data provided will be kept for the legal period established and, if not specified, as long as it is necessary to meet the purposes indicated above, after which it will be securely deleted.

5.4 Data processing on the basis of the consent to the Data Controller.

The Data Controller may request the data subject's consent to carry out the processing of personal data that requires such consent, for example delivery of commercial communications when there is no other legal basis, the performance of activities to promote its image or brand or the data's incorporation into the INVERSIS databases for participation in selection processes. For this purpose and specifically, the data subject will be informed in a specific way, requesting their consent, which may be withdrawn at any time through the applicable channels, or if not, by email to protecciondedatos@inversis.com.

The personal data provided will be kept for the period necessary to meet the purposes indicated above or until the revocation of your consent. At that time, it will be deleted safely.

The personal data collected will not be used to create profiles or make automated decisions.

6. RECIPIENTS OF PERSONAL DATA.

The customer is then informed of the communications and transfers of personal data that INVERSIS BANCO may make:

- Communications to Regulatory Bodies, Supervisory Bodies and Competent Authorities on the basis of a legal obligation or at their request.

- Communications of data relating to transactions carried out by citizens of U.S. nationality to the Control and/or Regulatory Authorities of the United States of America, in compliance with the tax obligations that are established.

- Communications of data to service providers and third parties with which it is contractually bound (among others, where applicable, to the regulated Independent Collaborator) by reason of a contract for the provision of services for the sole purpose of being able to formalise and carry out the obligations assumed by BANCO INVERSIS with the data subject.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA.

BANCO INVERSIS informs that, in general, no international transfers are made outside the European Economic Area (EEA).

In the event of a transfer of data outside the EEA, BANCO INVERSIS will have the appropriate safeguards in place for such transfer, in accordance with the requirements of the General Data Protection Regulation.

8. EXERCISE OF RIGHTS OF THE PERSONS CONCERNED.

The data subject may revoke the consent given, as well as exercise the following rights before the Data Controller:

- Right of access: the right to obtain information on what personal data is being processed and how it is being processed by the Data Controller.
- Right to rectification: the right to request the correction of personal data that is inaccurate.
- Right to erasure: the right to request the erasure of personal data.
- Right to portability: the right to receive the personal data provided for transmission to another Data Controller.
- Right to object: the right to request the cessation of the processing of personal data, when this is based on legitimate interest.
- Right to restriction of the processing of personal data.
- Right not to be subject to automated decisions.

To do so, the data subject must write to the following email address: protecciondedatos@inversis.com, indicating the right that they wish to exercise and the personal data or set of personal data that is the object of their request. For any questions or complaints regarding the processing of personal data, you may contact our Data Protection Officer, through the email address expressed above.

Finally, we inform you that you will have the right to file a complaint with the Spanish Data Protection Agency, as the supervisory authority. (www.aepd.es).