

## INFORMATION ON THE USE OF PERSONAL DATA

### 1. Who is the data controller?

The data controller is Bankinter, S.A. (hereinafter 'Bankinter') with Tax ID Number A28157360, registered office at Paseo de la Castellana, 29 (28046 Madrid) and telephone number 916 578 800.

Bankinter has appointed a Data Protection Officer who can be contacted at the following email address: [privacidad@bankinter.com](mailto:privacidad@bankinter.com).

### 2. Why do we process your data?

#### 2.1. Main purposes and processing carried out

Bankinter processes your personal data for the following purposes:

##### a) To comply with legal obligations

Bankinter may process your personal data to comply with any of its legal obligations, and particularly its obligations related to the regulation of the banking sector and anti-money laundering regulations.

In particular, we may process your data to:

- Prevent money laundering and the financing of terrorism:
  - Make a monthly declaration to the Financial Ownership File under the responsibility of the State Secretariat for Economy and Business Support of your identifying data, the identifying data of the real owners, representatives or authorised persons and of any other persons with power to act, of the opening or cancellation date of current accounts, deposit accounts, securities accounts and term deposits.
  - Provide information on payment transactions to the authorities or official bodies in other countries, both inside and outside the European Union, as part of the drive to combat the financing of terrorism and serious forms of organised crime and the prevention of money laundering. Financial institutions are also generally obliged to adopt adequate measures to prevent, investigate and uncover fraud.
  - Among other types of processing, compliance with these legal obligations and the legitimate interest of the bank in preventing, investigating and uncovering fraud may involve the transfer of personal data to companies in the Bankinter Group for these purposes.
- Information to the CIRBE:

Bankinter is obliged to declare to Banco de España's Risk Information Centre (CIRBE) the details required to identify people with whom it directly or indirectly maintains credit risks, as well as the characteristics of these people and risks, including specifically those that affect the amount and the likelihood of recovery.

Bankinter is entitled to obtain information from CIRBE on any risk positions they may have registered. Holders of a risk position declared to the CIRBE may exercise their rights of access, rectification and erasure under the legal terms and conditions by contacting Banco de España.

- Notifying and consulting solvency and credit files:
  - If you have a verified, due and enforceable debt with the Bank that has not been repaid within the specified period, Bankinter may notify this non-payment to files with information on financial solvency and creditworthiness.
  - If it is necessary to assess your financial solvency we will check your data in the financial solvency and credit files for the sole purpose of analysing the economic viability of any products and/or services that involve granting credit or deferred payment.

b) To execute the contract

Your data will be processed for the purpose of managing the products and services you request or arrange with Bankinter. Data protection regulations oblige us to maintain your identifying data up-to-date, along with any other details that are necessary for correctly executing the contract, so when necessary, your data may be updated with information from public sources (public records, property register, etc.) and with any sources you may have expressly made public (social media).

If you act on behalf of a legal entity, we will process your data to manage the products and services held by the legal entity where you provide your services.

c) To inform you of products or services that may be of interest to you

We may process your personal data for reasons other than executing a contract or complying with a legal obligation. This processing will be voluntary in nature, so you may object to it or withhold your consent.

Provided you do not object to it, and it can be reasonably foreseen, you may receive, via any communication channel (including electronic ones), information on products or services that may be of interest to you since they are similar to ones you already hold with us and which Bankinter promotes as part of its business. The Bank's legitimate interest will respect your Fundamental Rights at all times. This authorisation will continue until one year has elapsed from the termination of your contractual relationship with the Bank.

You can may object to these types of processing based on legitimate interest at a later time by contacting Bankinter through any of the channels included in section 5.

If you are acting as an authorised signatory on behalf of a legal entity, Bankinter has a legitimate interest in processing your contact details to locate you professionally and to maintain commercial and any other kind of relations with the legal entity where you provide your services.

d) To inform you of other products and services

Provided you have given your consent by ticking the relevant boxes, we may process your data for the following purposes:

- To inform you, via any communication channel (including electronic ones), of other products or services that have no similarity with the ones you have with us and that may be offered by Bankinter, by any company in the Bankinter Group and their subsidiaries or investees, or by third parties with which the Bankinter Group has entered into

partnership agreements, whose activities include the telecommunications and internet sectors, financial services and insurance, home equipment and assistance, the automotive industry and similar, leisure, catering, the hotel sector, travel and electronics. This authorisation will continue until one year has elapsed from the termination of your contractual relationship with the Bank.

- To enable Bankinter Group companies and their subsidiaries and investees to contact you through any channel (including electronic ones) to inform you about their products and services, either generically or in a customised manner by tailoring their offers to needs, tastes and preferences, for which purpose you give them permission to consult the personal data that any of these entities hold about you. You can find more information about the companies that make up Bankinter Group on our website [www.bankinter.com](http://www.bankinter.com), by selecting 'Corporate Website' followed by 'Corporate Governance' and then 'Subsidiaries and Investees'.

e) Other processing based on legitimate interest

- Data protection regulations oblige us to maintain your identifying data up-to-date, along with any other details that are necessary for correctly executing the contract, so when necessary, your data may be updated with information from public sources (public records, property register, etc.) and with any sources you may have expressly made public (social media).
- Carrying out satisfaction surveys by telephone or electronically to assess our products and services.
- If you apply for or already hold any type of financing product or service from BANKINTER GROUP companies, to enable them to verify and assess your financial solvency or the credit risk of approving those products or services, and to manage and monitor the financing products and services you already hold, using the details in the possession of any other Group company for these purposes. This consultation with other Group companies will speed up the application and management process for these products and services because it will enable us to ensure that their financing products and services are suitable for your debt capacity and to guarantee that BANKINTER GROUP performs adequate risk control.
- Fraud Prevention Service. As a payment service provider, Bankinter has joined IBERPAY, the information sharing service to prevent fraud. This enables us to assess in advance the risk of fraud in payments received from customers, and also to verify that the beneficiary accounts of payments are not, or have not been, involved in any fraudulent transactions.

All the financial institutions that have joined that common file are the controllers of this file ('joint data controllers'). You can request additional information about the key aspects of the joint controller agreement between the financial institutions by sending an email to the DPO. A list of all the institutions currently registered with the common file is available at the following link: [www.iberpay.es/Secciones/04MasServicios/Paginas/PrevencionFraude.aspx](http://www.iberpay.es/Secciones/04MasServicios/Paginas/PrevencionFraude.aspx)

The lawful basis for this processing is the legitimate interest of account holders who may be affected by third-party fraud, and of this Bank in its attempts to detect and prevent fraud in transactions where holders' accounts are either the originators or beneficiaries.

To detect, investigate, monitor and, where applicable, report any non-authorised or suspicious transactions carried out in your current account, Bankinter may do the following:

A) Disclose to the common fraud prevention file any non-authorised or suspicious transactions.

Bankinter, S.A. may include your personal data in a common file for the prevention of fraud in banking transactions. This file is managed by Sociedad Española de Sistemas de Pago (IBERPAY) to detect, investigate, monitor and, where applicable, report any non-authorised or suspicious transactions carried out in your current or deposit account.

B) Check the common fraud prevention file for any non-authorised and suspicious transactions.

Bankinter, S.A. may check your personal data in the common file for the prevention of fraud in banking transactions. This file is managed by Sociedad Española de Sistemas de Pago (IBERPAY) to detect, investigate, monitor and, where applicable, report any non-authorised or suspicious transactions carried out in your current or deposit account.

The data which the Bank may include or check are the IBAN number, account holder and, where applicable, details such as the IP address, geolocation and identification of the device where a non-authorised or suspicious transaction has been detected.

Only the joint-controller financial institutions can access and use this information, and only to detect, prevent and monitor fraud.

IBERPAY, as the common file manager, is the data processor and may therefore only use the data to manage this common file. IBERPAY and the joint data controllers have signed an agreement to ensure the necessary guarantees and security measures.

The data will be kept in the file for a maximum of thirty days in the case of suspicious transactions, and for a year in the case of non-authorised transactions, if the fraud has been confirmed by the affected party.

The Bank will automatically request the erasure of any data included in the common file that are inaccurate or do not faithfully reflect the affected party's situation.

We remind you that you can exercise your rights of access, rectification, erasure, objection to processing, restriction of processing and portability, or request more information about the operation of the common file for the prevention of fraud in banking transactions, through the channels indicated in Section 5.

## ***2.2. How do we tailor the offers to your needs, tastes and preferences?***

Before sending you any commercial information, and provided you have not objected, we analyse your personal data and create a profile to be able to send you commercial communications that match your needs, tastes and preferences as closely possible. Based on Bankinter's legitimate interests, this analysis may take into account the following:

- The data you have provided and which the Bank may obtain as a consequence of your contractual relationship.

- Your demographic data.
- Data on other company products you may have purchased.
- Your transactions and/or savings capacity.
- Geostatistical data calculated in an anonymised way.

Occasionally, and provided you have given your consent, we enrich these profiling techniques with information obtained from public sources or with data you have expressly made public (including social media). We may use data obtained from third-party companies to determine the level of your debt and tailor services and products to your needs.

Bankinter uses anonymised data to create predictive behavioural models both in designing its sales offers and in creating and designing new products.

### ***2.3. Spanish Department of Social Security***

In line with current anti-money laundering legislation, banks are obliged to ask customers to provide details of their economic activity and to verify this information. With this aim in mind, and provided we have your consent, Bankinter will consult the Department of Social Security for details about your economic activity. Any data obtained from the Spanish Department of Social Security will be used exclusively for this purpose. If a financial institution and/or its staff fail to comply with this obligation, all the actions defined in the prevailing legislation on personal data protection will be executed.

### ***2.4. How long do we process your data for?***

We keep your personal data for as long as they are necessary to provide the services you have arranged with us. As soon as they are no longer necessary for this purpose, your data will be blocked for the length of time during which they may be required for the exercise or defence of any administrative or legal proceedings. In general, they will be kept for 10 years to comply with anti-money laundering and counter-terrorism financing legislation, and for up to 20 years to comply with mortgage legislation. Once the statutory limitation periods have elapsed, your data will be erased.

If we have your authorisation, we will store your data once your contractual relationship with the Bank has ended for a maximum of one year to send you commercial communications.

## **3. What are the legitimate bases for processing your data?**

The legal basis for fulfilling the purpose included in section 2.1.a) is to comply with all the applicable legal obligations; and for the purpose included in section 2.1.b) it is to execute the contract. The collection of your data is therefore necessary to fulfil these purposes, and if you refuse to supply them or you supply inaccurate or incomplete data we may not be able to provide the services you have arranged with us in a proper manner. You are responsible for ensuring the data you provide are true, accurate, current and complete, and for notifying Bankinter of any changes.

The legal basis of all processing carried out for the purpose of sending you commercial communications about products or services that may be of interest to you because they are similar to the ones you already hold and which Bankinter is the legitimate interest of the data controller

or a third party (section 2.1.c). You may therefore object to this when you supply your data or at a later time.

The legal basis for the processing carried out to send you commercial communications about other products or services that have no similarity with the ones you already hold and that are offered by Bankinter, by any company in the Bankinter Group or by third companies with which Bankinter Group has entered into partnership agreements (section 2.1.d) is your consent, where given.

The legal basis for the transfer of your data to companies in the Bankinter Group and its subsidiary or part-owned companies, including the processing necessary to personalise the corresponding offers, is your consent.

The legal bases for the processing carried out to create the necessary profile and ensure that the commercial communications tailored as closely as possible to your needs, tastes and preferences are those stated in section 2.2.

Compliance with the obligations and the exercise of rights deriving from your contractual relationship with Bankinter will never be contingent on your having provided the requested consents. Remember, if you have provided your consent, you have the right to withdraw it at any time without any consequence for the services or products you hold with us or for which you are a beneficiary.

Lastly, legal basis for the processing carried out in section 2.1.e) is the data controller's legitimate interest.

If you have any questions about why we process your personal data or the legal basis for doing so, please contact the Data Protection Officer. The contact details are provided in section 1.

#### **4. Who will receive your data?**

Your personal data may be disclosed to public administrations, authorities and organisations, including courts and tribunals, companies in the Bankinter Group and collaborating third parties, when required by the applicable legislation or when it is necessary to prevent, investigate and uncover fraud or for the correct management of the products and services provided. We may also disclose your data to entities that manage credit information systems or similar.

If you have given your consent, we may disclose your data to Bankinter Group companies and their subsidiaries and investees so that they can send you information through any channel (including electronic ones) about products and services tailored to your needs, tastes and preferences. For this purpose, they may consult data that any of these companies hold about you. You can find more information about the companies that make up Bankinter Group on our website [www.bankinter.com](http://www.bankinter.com) by selecting 'Corporate Website', followed by 'Corporate Governance' and then 'Subsidiaries and Investees'.

We will disclose your data to the Bankinter Group companies from which you request or with which you hold any type of financing product or service so that they can verify your financial solvency or the credit risk of approving those products or services, and can also manage and monitor the financing products and services that you already hold, using the details in the possession of any other Group company for these purposes, as explained in section 2.1.e).

The service providers that Bankinter currently uses, or may use in the future, as data processors may also access your personal data. You can find more information about the provider categories by clicking on the following link.

[https://docs.bankinter.com//file\\_source/nbol/nav/seguridad-privacidad/categorias\\_servicios.pdf](https://docs.bankinter.com//file_source/nbol/nav/seguridad-privacidad/categorias_servicios.pdf)

For more information on how Bankinter protects your personal data, please click the following link: <https://www.bankinter.com/banca/nav/seguridad-privacidad>

## **5. What are my rights in relation to the processing of my data?**

You may exercise the following rights at any time in the circumstances and under the scope established by the applicable legislation currently in force:

- Access: The right to know what data we are processing.
- Rectification: The right to correct your data if they are inaccurate.
- Erasure: The right to have your data erased when they are no longer necessary for the purposes for which they were collected.
- Objection. The right to withdraw any consent given and to object to the legitimate interest of the processing carried out.
- Restriction of processing: The right to restrict the processing of your data in the circumstances established in the regulation.
- Portability: The right to receive the personal data you provide us in a structured and commonly used format so that you can give them to another data controller.

To exercise these rights, you can contact Bankinter through any of the following channels:

- Through Telephone Banking on 916 578 800.
- At your usual branch.
- By writing to Bankinter, S.A. Operations, Data Protection. Calle Pico San Pedro, 1. Tres Cantos. 28760 Madrid.
- Through the website: [www.bankinter.com](http://www.bankinter.com).

You also have the right to submit a complaint to the Spanish Data Protection Agency.

## **6. How do we obtain your data?**

Bankinter processes the personal data you provide when you arrange the services described in this agreement and when you use those services. If we have your permission, we may also obtain your data from the Bankinter Group companies with which you hold a product or service.

Data protection regulations oblige us to maintain your identifying data up-to-date, along with any other details that are necessary for correctly executing the contract, so when necessary, your data

may be updated with information from public sources (public records, property register, etc.) and with any sources you have expressly made public (social media).

Provided you have given your consent, we enrich these profiling techniques with information obtained from public sources or third-party companies to create and customise offers tailored to your needs, tastes and preferences.

Last updated date: December 2020