



PRIVACY NOTICE – INFORMATION ON THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH THE BBVA APP

1. What is the purpose of this privacy notice?

The purpose of this privacy notice for the processing of personal data via and in the context of the BBVA App ("Privacy Notice") is to inform the user about the collection, processing and protection of personal data that they have provided to us or that we collect through our BBVA App (hereinafter "the Application" or the "App") via forms and/or cookies. When purchasing products or services with Banco Bilbao Vizcaya Argentaria, S.A. German Branch (hereinafter "BBVA", "we", "us", "our"), this Privacy Notice informs the user about the processing of personal data that BBVA obtains through the Application; however, it does not apply to information obtained from third parties on other websites or applications, even if they are linked through the application. It is important to review this Privacy Notice each time the Application is used, as it may be subject to changes.

2. Who is the data controller of the user's personal data?

Banco Bilbao Vizcaya Argentaria S.A. German branch with headquarters in Neue Mainzer Straße 28, 60311 Frankfurt am Main (Germany). Email address: kundenservice@bbva.de.

3. How to contact BBVA's Data Protection Officer?

You can contact BBVA's Data Protection Officer (hereinafter "DPO") at the following email address: datenschutz@bbva.de

4. What personal data does BBVA collect and use about you?

In connection with your use of the App, BBVA may process the following personal data (being basic data necessary for the operation of the App) which comes from information you have

provided directly to us, information we have collected or generated about you and information we have obtained from other sources.

In connection with your use of the App, BBVA may process the following personal data. This data comes from information that you have provided to us directly, that we have collected or generated about you, and that we have obtained from other sources. Some of the following personal data is required for the execution of the contract with you or to fulfil legal obligations. In this case, we may not be able to offer you our products and services without the provision of your personal data, or only to a limited extent.

- **Identification and contact data such as:** name, surname, photograph, ID card, passport, nationality, country of birth, date of birth, postal addresses, e-mail addresses, landline telephone number, mobile telephone number as well as data referring to your image.
- **Signature details:** handwritten, digitalised and online banking keys.
- **Identification codes or passwords** for accessing and operating the remote channels you use in your relationship with BBVA.
- **Financial and asset solvency data such as:** net monthly income, average account balance, asset balance, direct debited bills, direct debited payroll, income and expenses, assets as well as, if applicable, data related to your financial rating, financial situation and investment objectives.

In the event that you have a debt with BBVA that is certain, due and payable, additional data may be obtained in order to manage the collection of the debt.

- **Transactional data** such as: your account movements, card movements, balances, deposits, payments, transfers, debits, receipts, direct debits. They include the origin, destination, concept and third party related to the transaction, as well as the location where it is made and the date and time. In addition, the aforementioned data refer to those that BBVA processes in relation to the products and services that you have contracted with BBVA and the products and services of the aggregated entities in the event that you have contracted the Aggregation or Payment Initiation services.

- **Socio-demographic data**, such as: age, marital status, family situation, residences, studies and occupation (type of contract, length of employment) or membership of groups.
- **Data on products and services contracted**, such as: contract number, limit associated with the products contracted, type of products and services contracted, contract data (attributes associated with the contract), direct debit account, risk with BBVA, participants, as well as any documentation associated with any of these contracts.
- **Data included in the aggregation and payment initiation services:** in case you have contracted these services, we process data of products and services contracted in the other aggregated entities and data of the other mentioned categories (e.g. signature data, transactional data, including where applicable their origin, destination, concept, location, date and time, etc.) in respect of these services.
- **Communications data:** data resulting from telephone calls or contacts you make with the Bank through any oral or written communication channel, such as email, instant messaging, social networks, or conversational interfaces made available to you from time to time, and data from commercial communications, including the results of such communications, as well as data you provide us through satisfaction surveys.
- **Data collected or generated about you:**
 - Information derived from the products and services contracted such as: browsing data and use of digital channels, data related to your contact with BBVA through the different channels, geolocation data, data obtained from your comments in communications or transactions, information included in your transactional data such as receipts, transfers, debits or data derived from interaction with chatbots.
- **Data obtained from other sources:**
 - Information to analyze the economic feasibility of your requests and transactions, collected from credit information systems SCHUFA Holding AG

(see detail of Schufa notification according to art. 14 GDPR in the Annex).

- Information collected through information systems for fraud prevention.
- Information obtained from national and European authorities, such as the Interbank Alarm Center, the Single Justice Fund, and the Revenue Agency.
- Publicly accessible sources, such as newspapers and official bulletins, public records, resolutions of government entities, the national registry, lists of people registered with trade associations, and fraud prevention lists (SCHUFA Holding AG).
- Digital behavioural data obtained by BBVA from platforms and mobile phones associated with cookies or devices as described in our [Cookie Policy](#) and [Website Privacy Notice](#).
- (Social) media: Occasionally, we may use publicly available information from you, including selected social media websites or apps, media stories, or online registers and directories, to carry out enhanced due diligence checks, for example to comply with anti-money laundering or sanctions screening obligations.

5. For what purposes do we use the user's personal data and what is the legal basis?

In connection with your use of the App, BBVA may process the following personal data (being basic data necessary for the operation of the App) which comes from information you have provided directly to us, information we have collected or generated about you and information we have obtained from other sources.

In connection with your use of the App, BBVA may process the following personal data. This data comes from information that you have provided to us directly, that we have collected or generated about you, and that we have obtained from other sources. Some of the following personal data is required for the execution of the contract with you or to fulfil legal obligations. In this case, we may not be able to offer you our products and services without the provision of your personal data, or only to a limited extent.

- **Access to the app:** In order to manage access to the app through identification and authentication measures, the processing of personal data is necessary for the fulfilment of the contract with you (Article 6(1)(b) GDPR).
- **Management of products and services:** To manage the products and services you have requested or contracted with BBVA, the processing is necessary for the performance of the contract with you (Article 6(1)(b) GDPR).
- **Fulfilment of legal obligations:** Processing is necessary for the fulfilment of legal obligations to which BBVA is subject (Article 6(1)(c) GDPR).
- **Credit scoring:** The processing of information from and consultation of credit information systems is necessary for the fulfilment of BBVA's legitimate interests in order to determine the credit risk (Article 6(1)(f) GDPR).
- **Fraud prevention:** Fraud prevention, including processing carried out via the app to detect malicious code (malware) to prevent bank fraud. The legal basis is BBVA's legitimate interests (Article 6(1)(f) GDPR).

To ensure operation and to implement additional security layers for fraud prevention and user protection, information may also be collected to analyse the risk profile of a session when providing services and functions of the app. This analysis is based on various parameters such as the device ID, device-specific risk data, geographical location information and speed checks. This data is cross-referenced in real time with other sources, including recent malware infections and phishing incidents. In this way, fraudulent access attempts can be recognised and cases of device impersonation or use of compromised credentials can be identified. Information can also be collected from interactions with mobile apps to create a trust/risk assessment for the session. This is based on multiple parameters such as device identification, device risk data, previously compromised credentials, location data and velocity checks across web and mobile interactions.

All of this is used to detect potential anomalies in the user's interaction with the bank. Based on this information, alerts and recommendations can be generated that enable

measures to be taken to minimise the risk of fraud in a particular transaction. The measures thus serve BBVA's legitimate interest in preventing fraud.

To prevent fraudulent behaviour that could jeopardise your financial products with BBVA and to detect unauthorised use of the app, we also collect information about user behaviour in the app and the possible existence of fraudulent apps on your device that could damage the device or exploit its vulnerabilities and be used to misuse your identity and financial integrity.

- **Advertising and profiling:** For risk analysis, profiling and commercial purposes, we will only do the following with your consent: (i) the creation of commercial profiles and risk profiles; (ii) the offer of BBVA products and/or services and products and/or services marketed by BBVA that are similar to those already contracted with BBVA via email or equivalent communication channels; and (iii) the offer of BBVA products and services marketed by BBVA and partner companies (Article 6(1) lit. a) GDPR).
- **App functionalities:** To manage the functionalities of the App that may be available in the App from time to time, as described in the Terms of Use. The legal basis is the performance of the contract (Article 6(1)(b) GDPR).
- **Cookies in the App:** Data processing to manage your navigation in the app in accordance with the [cookie policy](#) will only take place if consent has been given (Article 6(1)(a) GDPR).

6. To whom do we share your data (recipients)?

To provide an adequate service and manage the relationship we have with our customer, at the following address

https://www.bbva.de/content/dam/public-web/alemania/documents/general/rechtliche-dokumente/datenschutz/liste-bbva-dienstleister_eng.pdf there is a list by categories of companies that process data on behalf of BBVA in the context of outsourced services. The BBVA Cookie Policy ([here](#)) can be consulted to view third parties receiving personal data through this Application.

We will also share your personal data with companies outside the European Union and providing services to BBVA. Such transfers are carried out based on one of the following data

transfer mechanisms: (i) to countries with a level of protection comparable to that of the European Union (adequacy decisions adopted by the European Commission); (ii) through entering into standard contractual clauses; or (iii) through other certification mechanisms. For more information, you can contact BBVA's DPO by writing to the following email address: datenschutz@bbva.de

7. Does BBVA use any technology that allows it to collect personal data for advertising purposes?

BBVA informs that each user's mobile device is equipped with a unique identifier that allows receiving personalized ads through mobile applications ("Advertising Identifier"). If the user has enabled this feature through their device settings, they can receive personalized offers based on their customer profile. The identifier can be reset or personalized ads can be disabled depending on the mobile device's operating system. The following links provide more information on configuring the advertising identifier of the mobile device in use and how it can be disabled: Android operating system:

8. Does BBVA use links that refer to other websites?

The application may contain links to other websites or applications. Please note that BBVA is not responsible for the privacy and data processing practices of other websites. This Privacy Notice is only valid for the information collected by BBVA through the Application. It is recommended to read the personal data processing information of other websites that you may link to through our application or visit in any other way. For more information on our link policy, please see our Legal Notice [here](#).

9. What are your rights when you provide us with your data?

You have the following data protection rights:

RIGHTS	CONTENT
Access	You can request access to and a copy of your personal data stored in BBVA's files (Article 15 GDPR)...
Rectification	You can request that we rectify your personal data if it is inaccurate (Article 16 GDPR).
Deletion	You can request the deletion of your personal data (Article 17 GDPR).
Objection	You can object to the processing of your personal data based on legitimate interests (Article 21 GDPR).
Restriction of Processing	<p>You can request the restriction of the processing of your data in the following cases(Article 18 GDPR):</p> <ul style="list-style-type: none"> • During the verification of the accuracy of the data following a contestation. • When the processing is unlawful but you oppose the deletion of your data. • When BBVA no longer needs to process your data, but you need it for the exercise or defense in case of claims. • If you object to the processing of your data for the performance of a task in the public interest or for the satisfaction of a legitimate interest while verifying whether the legitimate reasons for processing may prevail or not over yours.

Data Portability	You can receive the personal data provided in electronic format and transmit it to another entity (Article 20 GDPR).
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CUSTOMER ASSISTANCE CHANNELS

datenschutz@bbva.de	Customer service BBVA Frankfurt: Neue Mainzer Str. 28 60311 Frankfurt am Main Deutschland
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If you believe that we have not processed your personal data in compliance with regulations or if you have any questions, you can contact the DPO by writing to datenschutz@bbva.de.

Additionally, you have the right to file a complaint with a Data Protection Authority. The data protection authority competent for us is: Data Protection Authority of Hesse.

You can also withdraw your consent at any time for the future, without affecting the lawfulness of the processing until your withdrawal, and configure your options or the consent granted through the option in online banking, the BBVA app, and through your advisor by sending a request to datenschutz@bbva.de or by writing to BBVA German Customer Service: Neue Mainzer Str. 28 60311 Frankfurt am Main Deutschland.

Remember:

You can consult the latest updated version of BBVA's Privacy Notice at <https://www.bbva.de/en/content/dam/public-web/alemania/documents/general/rechtliche-dokumente/datenschutz/verarbeitung-personenbezogener-daten.pdf>