

# Website privacy notice for www.bbva.de

This Privacy Notice describes how Banco Bilbao Vizcaya Argentaria, S.A., German Branch ("BBVA", "we", "us", "our") processes personal data collected from users and visitors (together "the User" or "Users") of the website www.bbva.de (the "Website"), in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"). It complements BBVA's <u>Privacy Notice for customers</u> and <u>Cookie Policy</u>.

# 1. What is the purpose of this Privacy Notice?

The purpose of this Privacy Notice is to inform you about how we process – e.g. collect, manage and use – the personal data that you provide to us or that we collect via our Website and the cookies we use (you can find more information on the cookies in BBVA's <u>Cookie</u> Policy.

When you purchase products or services from BBVA via the Website, you can find further information on our processing of your personal data in the context of the provision of our products and services in the Privacy Notice for customers.

Please review this Privacy Notice regularly as it may be subject to change.

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

Banco Bilbao Vizcaya Argentaria, S.A., German Branch ("BBVA"), with registered office at Neue Mainzer Straße 28, 60311 Frankfurt am Main (Germany). E-mail: kundenservice@bbva.de.

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

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



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

This data comes from information that you have provided to us directly, that we have collected or generated about you.

Certain technical and device data is required and you are obliged to provide this to display the Website and for its technical functioning. If you do not provide this data, we will not be able to properly display and run the Website.

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

In connection with your use of the website, BBVA may process the following personal data. 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 private section of the website: In order to manage access to the private section of the website 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).
- Fraud prevention: Fraud prevention, including processing carried out 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 website. 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 and ensuring data and IT security.

- Website functionalities: To manage the functionalities of the website that may be available on the website from time to time, as described in the Terms of Use. The legal basis is BBVA's legitimate interests (Article 6(1)(f) GDPR) or the performance of the service website (only where strictly necessary, for example for properly displaying the website) (Article 6(1)(b) GDPR).
- Cookies on the website: Data processing to manage your navigation in the website in accordance with the <u>Cookie Policy</u>, which however will only take place for cookies that are technically not necessary if consent has been given (Article 6(1)(a) GDPR).

# 6. What personal data does BBVA process?

BBVA processes technical data and device data via the Website, such as date and time of retrieval, IP address of the accessing computer, pages visited on our Website, information about the browser type and version used and user agent.

In addition, BBVA processes identification codes or passwords for accessing and operating the remote channels you use in your relationship with BBVA.

#### 7. Does BBVA send commercial communications?

Through data collection forms, BBVA may request the users' consent to contact them by ordinary mail, e-mail, SMS or any other equivalent means of electronic communication, in order to send commercial communications about its own and/or third-party products identified on the form.

If, at any time, the user no longer wishes to receive such communications, they may revoke their consent by sending a communication to the following e-mail address kundenservice@bbva.de or to BBVA Germany Customer Service: Neue Mainzer Straße 28, 60311 Frankfurt am Main (Germany). The user, in any case, may also revoke their consent by using the specific link included in the commercial communications received.



# 8. How long do we keep the personal data?

BBVA is subject to various retention and documentation obligations under German Commercial Code (HGB), the German Fiscal Code (AO), the German Banking Act (KWG), the German Money Laundering Act (GwG) and the German Securities Trading Act (WpHG), among others. The periods for retention and documentation range from two to ten years.

Finally, the storage period is also assessed according to the statutory limitation periods, which, for example, according to Sections 195 et seq of the German Civil Code (BGB), are generally three years, but in certain cases can be up to 30 years.

Technical data collected for security and operational purposes via the Website will be retained for a maximum period of 48 hours, unless a longer period is required to investigate a specific security incident. This retention period aligns with BBVA's data minimisation and cybersecurity protocols. We will delete your personal data after this retention period ends.

### 9. With whom do we share user's personal data (recipients)?

Users can consult BBVA's <u>Cookie Policy</u> to view third parties receiving their personal data through the Website's cookies.

We will also share your personal data with companies outside the European Union and providing services to BBVA. Such transfers are made one of the following data transfer mechanisms: (i) to countries with data protection levels equivalent to those of the European Union (adequacy decisions adopted by the European Commission); (ii) through entering into standard contractual clauses adopted by the European Commission; or (iii) through other certification mechanisms. For further information, you may contact BBVA's DPO by writing to the following e-mail address: datenschutz@bbva.de.

#### 10. Does BBVA use links to other websites?

The website may contain links to other websites. Please note that BBVA is not responsible for the privacy and data processing practices of other websites. This Privacy Notice only applies to information collected by BBVA's website. We recommend that users read the privacy policies of other websites that you may link to through this website is linked or visit in any other means. For more information on our linking policy, please see our Legal Notice here.



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

Users have the following data protection rights:

Right	Contents	Customer service channels
Access	Users can request access to and a copy of your personal data stored in BBVA's files (Article 15 GDPR).	datenschutz@bbva.d e BBVA Germany Customer Service: Neue Mainzer Straße 28, 60311 Frankfurt am Main (Germany)
Rectification	Users can request that we rectify your personal data if it is inaccurate (Article 16 GDPR).	
Deletion	0.Users can request the deletion of their personal data (Article 17 GDPR).	
Objection	O.Users can object to the processing of their personal data based on legitimate interests (Article 21 GDPR).	
Restriction of processing	Users can request the restriction of the processing of their data in the following cases (Article 18 GDPR):  - During the verification of the accuracy of the data following a contestation.  - When the processing is unlawful and users oppose the deletion of their data.  - When BBVA no longer needs to process the user's data, but the user needs it for the exercise or defence of a legal claim.  - If users object to the processing of their 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 theirs.	
Portability	Users can receive the personal data provided in electronic format and transmit them to another entity (Article 20 GDPR).	

If the user considers that we have not processed their personal data as required by law, they may contact the DPO by writing to datenschutz@bbva.de.

In addition, users have the right to lodge a complaint with the Data Protection Authority of the State of Hesse (https://datenschutz.hessen.de/).

Users also have the right to revoke the consent given at any time with effect to the future without affecting the lawfulness of the processing prior to withdrawing consent. Users may also send their withdrawal to the e-mail address: datenschutz@bbva.de or by writing to Customer Service BBVA Germany: Neue Mainzer Straße 28, 60311 Frankfurt am Main (Germany).

Last updated: May 2025



# **Important:**

Users can consult the latest version of BBVA's Privacy Notice at <a href="https://www.bbva.de/content/dam/public-web/alemania/documents/general/rechtliche-dokument-e/datenschutz/verarbeitung-personenbezogener-daten\_eng.pdf">https://www.bbva.de/content/dam/public-web/alemania/documents/general/rechtliche-dokument-e/datenschutz/verarbeitung-personenbezogener-daten\_eng.pdf</a>.