

The following translation is provided for the customer’s convenience only. The contractual language is German. Therefore, German legal documents are binding in all respects and constructions, meanings or interpretations in the German legal documents shall prevail in case of inconsistency with the English version.

Privacy Notice

Please take some time to read this document carefully. If you find any points unclear, do not hesitate to contact us.

Summary	
Data controller	<p>Banco Bilbao Vizcaya Argentaria, S.A., German branch ("BBVA"), with registered office at Neue Mainzer Str. 28 60311 Frankfurt am Main, Germany.</p> <p>E-mail: bbvabank@bbva.de</p> <p>For more information, see the other information section.</p>
Purpose	<p>If you are a BBVA customer, we will process your personal data for the following purposes:</p> <ul style="list-style-type: none">1. to manage the contractual relationship with BBVA regarding the products and services you requested;2. to comply with legal obligations and applicable regulations for BBVA;3. to send information to the credit information system and consult it to determine credit risk and prevent fraud;4. to prevent fraud;5. For risk analysis and commercial purposes:<ul style="list-style-type: none">(i) preparation of commercial profiles(ii) preparation of risk profiles(iii) offers of BBVA products and services or marketed by the bank, the BBVA Group, or investors or partner companies.6. Data analysis.

	<p>If you are authorized to represent a BBVA customer in dealings with the Bank as provided by applicable law through a valid court order, we will process your data to manage the contractual relationship related to the customer you represent in BBVA.</p> <p>For more information, see the other information section.</p>
Rights	<p>You may exercise, at any time, your data protection rights such as, for example, the rights of access, rectification, and deletion of data, as illustrated in the Other Information section.</p>
Other information	<p>You can find additional and detailed information on BBVA's Privacy Notice in the Other Information section.</p>

If you are authorized to represent a BBVA customer in dealings with the Bank as provided by applicable law through a valid court order, the processing of your data is necessary to manage the contractual relationship of the customer that you represent. When you enter the required password during the signing process, you accept this Privacy Notice.

If you consent in the app or the online banking to processing of your personal data, we may perform a detailed analysis, for example, for profiling activities, and send you offers related to other products and services that we deem of your interest.

Your consent that you provided separately

As a reminder, if you provided your consent in the app or online banking, these are the consent forms (this is for transparency purposes only, you do not have to tick any boxes and we do not create or imply consent by providing this Privacy Notice to you):

☐ I consent to Banco Bilbao Vizcaya Argentaria, S.A., German branch with registered office at Neue Mainzer Strasse 28, 60311 Frankfurt am Main, Germany, (**BBVA, we, us, our**) collecting and processing my personal data (the categories specified in the "More information" section) for marketing purposes to offer me solutions that help me better manage my finances as described in detail in this consent form in the More information section.

+ info in More Information, in Preparation of Commercial and Risk Profiles.

☐ I consent to BBVA sending me marketing on products and services offered or marketed by BBVA and partner companies through SMS, MMS, email, push notifications and calls.

+ info in More Information, in Offering Products and/or Services of BBVA and/or its partner companies.

You can configure and modify the options and your consent you have selected at any time through the app, online banking, or by sending a request via email to datenschutz@bbva.de.

Please note that processing for these purposes is not mandatory. Therefore, if you do not select the checkboxes in the app or online banking, you will not consent to the processing, without this affecting the development or compliance of the contracts related to the products and services you have signed with the Bank. Again, this is only for transparency purposes you do not need to tick any checkboxes.

Detailed information – Privacy Notice

Below, we will delve into all the details on how we process your personal data at BBVA.

Who is the data controller for your personal data?

Banco Bilbao Vizcaya Argentaria, S.A., German branch ("BBVA"), with office at Neue Mainzer Str. 28 60311 Frankfurt am Main, Germany. Email: bbvabank@bbva.de.

How can you contact BBVA's Data Protection Officer?

You can contact the Data Protection Officer by sending an email to: You can contact the Data Protection Officer by sending an email to: datenschutz@bbva.de.

What data do we process? From where do we get your data?

If you are already a customer

At BBVA, we process the data listed below, which we collect through the information you provide directly, the information we have obtained or generated about you, and the information collected through other sources. BBVA processes this data in relation to the products and services you have signed with us and in relation to the products and services of third parties we distribute.

- **Identification and contact information:** name, surname, maiden name, tax ID (Steueridentifikationsnummer), city/country of birth, date of birth, nationality, postal address, identification document (passport, ID card, including the machine-readable zone number), identification document number (passport, ID card), screenshot of the ID document, validity of the ID document (valid until, date of issue and issuing authority), date

of issue of the ID document, phone number, email address, debit card number, account number, IP address, online identifiers (device ID), audio recording of the call, video recording of the call (including the storage of the recording of cancelled calls for the purposes of complaint management and the processing required in this context (e.g. processing of queries regarding cancellation), data on civil status (such as: single, married and in this case the date of marriage, if you have communicated them for tax exemption applications), payment card information from other payment service providers to generate the tokens for its storage under the Top Up service (once the token is generated, the data will be deleted from BBVA's systems).

Identification data of your spouse, such as: gender, first name, surname, date of birth, tax-ID (Steueridentifikationsnummer), current account holder with BBVA, if you have provided this data for tax exemption applications.

- **Signature data:** codes for online banking and electronic signature data.
- **Identification codes or passwords:** your BBVA user name and password.
- **Details related to financial solvency and capital,** such as: annual net income, average balance in accounts, asset balance, direct debits, pay slips, income and expenses, as well as data related to financial evaluation.

Similarly, if provided, BBVA will process data related to your employment. If you have a specific debt, overdue and payable with BBVA, we may collect additional data to manage its recovery.

- **Transaction data:** transactions executed on the account and with the cards, balance, income, payments, transfers, debts, utility bills, direct debits. These data include the origin, reasons, and third parties involved in the transactions, including details of the beneficiary, details of the merchant or ATM used, details of devices used and payment method used, as well as the location, date, and time they were made. The data also includes information processed by BBVA regarding the products and services you have subscribed to with BBVA and products and services of aggregated entities if you have contracted the aggregation service (the "Aggregation Service"), as further described below.
- **Sociodemographic data,** such as: age, gender and occupation, source of funds.
- **Data on the products and services subject to the contract,** such as: contract number, limit associated with the products subject to the contract, type of products and services subject to the contract, contractual data (attributes associated with the contract), direct debit account, risk with BBVA, participants, and any documentation related to any of these contracts.

- **Data included in the Aggregation Service:** if you have contracted this service, we will process data related to the contracted products and services with other aggregated entities and data concerning the other categories indicated concerning such services, e.g., signature data, transaction data (including, where appropriate, origin, destination, reason, location, date and time, etc.).
- **Data included in My Trips experience:** if you use the service My Trip, we will process data that you provide us such as the destination of your trips, dates of your trips and budgets.
- **Communication data:** data generated during phone calls (including records of phone calls) or any contact made with the Bank through written or oral communication means, such as email, instant messaging, social media, conversational interfaces, available at any time, as well as commercial communication data, including the results of such communications, and the data sent during customer satisfaction surveys.
- **Data related to the use of channels:** Data about your visit, including links you have clicked on through and from our website or app, including date and time, services you viewed and searched for, page response times, download errors, length of visit of certain pages, page interaction information, and methods to browse away from the page

Data collected or generated about you

- Data related to the use of channels provided by BBVA to manage your products and services, such as device ID or IP address, navigation, and access data.
- Information derived from the products and services purchased, such as: browsing and usage data of digital channels, data related to your contract with BBVA through various channels, data collected through your comments during communications or transactions, information included in your transaction data such as utility bills, transfers, debits, or data generated by your interaction with chatbots.

Data collected 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 behavior data obtained from platforms, mobile phones, and media centers assigned to cookies or devices when you accept our cookie and website processing policy.
- (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.

If you are an authorized representative of the customer

- Identification and contact data (including postal and/or email addresses).
- Signature data (including digital and electronic signatures).
- Identification codes or passwords to access remote channels and use them during transactions with BBVA.
- Data related to the products or services you manage.
- In addition to the aforementioned data, other personal data may be collected if you have authorized the Bank to do so.

BBVA will ask you to keep your data adequately updated to ensure that the data we process is correct, complete, accurate, and up-to-date at any time. If you change them, you must inform us immediately so that we can update your current situation.

For what purpose and on what legal basis do we process your personal data?

If you are already a customer

1. Managing the contractual relationship concerning the products, services and promotions you requested or agreed upon with BBVA

During the registration request process as a new customer

BBVA processes your personal data to identify you and manage the registration request process as a new customer, as indicated in the process itself, in order to comply with our anti-money laundering (AML) and counter-terrorist financing (CTF) obligations. During the account opening process, BBVA will, through the videocall identification process, provided that you have agreed to the recording: (i) verify your identity by profiling of the user in front of the camera, with matching of the photo on the ID document and masking check of the user and the ID document; (ii) confirm the authenticity of your identity document; and (iii) verify that your identity matches the information provided during the account opening process.

In addition, BBVA will process your personal data for the purpose of organising, controlling and monitoring BBVA promotions in which you choose to participate and for the delivery of the bonus.

When you are a customer because you request or agree to any product or service

BBVA will process your personal data for the following purposes:

- To adequately manage the products and services you requested; this includes assessing your solvency, developing, managing, and monitoring the pre-contractual and contractual relationship between you and BBVA.
- To respond to your questions and follow up on the relationship between you and the Bank and your financial situation (concerning the products and services contracted with BBVA and those offered by BBVA).
- To send non-commercial notifications to manage your relationship with BBVA derived from the products and services contracted with us.
- To provide you with financial data simply and intuitively through the various channels made available by BBVA at any time.
- To control, analyze, and manage risk and fraud situations, defaults, problems, or complaints regarding your status as a customer, including any processing within investigative activities or determining necessary actions.
- To manage your access to the various channels made available by BBVA to access and manage the products and services you have contracted with BBVA.

The legal basis that allows us to process your personal data is pre-contractual measures to enter into, termination of and the execution of the contract covering the products and services requested or agreed upon with BBVA.

Additionally, in certain cases, BBVA may collect additional data directly or through companies delegated with debt recovery services and process it based on its legitimate interest in recovering such amounts and pursuing debt repayment.

2. For the legitimate interests of BBVA or third parties

BBVA can process your personal data for legitimate interests pursued by us or a third party.

We set out the legitimate interests relied upon specifically in this Privacy Notice (such as fraud prevention, credit risk checks and direct marketing). In addition, we process your personal data for other legitimate interests including for example:

- Administrative purposes of the BBVA group of undertakings
- Network and information security
- Risk management within the BBVA group
- Cost efficiency

- Digitalization of our processes, products and services
- Improving our processes, service levels and products and user experience
- Product analysis which may include the analysis of your user behaviour in relation to certain products and promotional offers
- Personalization of products and services and of customer service
- Market and opinion research
- Conduct and produce anonymized statistical research and reports
- Direct marketing
- Initiate contacts and business
- Sending customers relevant information related to their use of our products and services, as far as necessary to provide such information. For this purpose, we use customer segmentation.
- Preventing, detecting and investigating criminal acts or breach of contract
- Establishment, exercise and defense of legal claims, including investigating and legally assessing the facts of a claim and involving external counsel
- Sharing information and cooperating with regulatory authorities
- Consultation of and data exchange with credit reference agencies (e.g. SCHUFA) to determine creditworthiness and default risks and the need for a garnishment protection account or basic account (see below for more details)
- Data exchange with intermediaries regarding the conclusion of contracts or any missing documents, as well as for billing purposes
- Measures to refinance loans
- Ensuring the regularity and security of business processes, financial and risk management
- Further development and testing of artificial intelligence (AI) as part of the preparation for the credit check. This includes the use of data to improve algorithms and to analyze fraud patterns
- Regulatory requirements for updating and reviewing internal risk models

3. Complying with legal obligations and regulations applicable to BBVA

(i) Regulatory compliance

BBVA can transmit your personal data to or consult any information from you in other entities such as other financial institutions, regulatory and supervisory authorities as well as public and governmental bodies and agencies, including the ECB (European Central Bank), the EBA (European Banking Authority), the German Federal Bank, the BaFin (German Federal Financial Supervisory Authority) among other entities, who will act as separate data controllers of your personal data, for the purposes of:

- enforcement of claims and defense with legal disputes, based on the legitimate interest of BBVA of exercising its right of defense before courts/competent authorities;

- complying with legal obligations regarding regulatory, tax and anti-money laundering reporting requirements;
- fraud prevention, based on the legitimate interest of BBVA not to contract or provide services to any potential customer related to fraud;
- preventing criminal acts, based on the legitimate interest of BBVA not to contract or provide services to any potential customer related to any crimes.

The legal basis for processing is the fulfillment of a legal obligation to which BBVA is subject (Spanish Law 44/2002 of November 22 on financial system reform and German law, in particular the German Banking Act (Kreditwesengesetz – KWG).

(ii) Prevention of money laundering and terrorist financing

To prevent money laundering and terrorist financing, the Bank is obliged to:

- Collect information about you and identify you to comply with the due diligence obligations imposed by these regulations;
- Analyze transactions carried out through BBVA where required by law;
- Provide information on transactions to national and foreign authorities, both within and outside the European Union, under the legal regulations of some countries and agreements signed between them.

The legal basis for processing is compliance with a legal obligation to which BBVA is subject (Spanish Law 10/2010 of April 28 on the prevention of money laundering and terrorist financing, and Spanish Law 5/2015 for the promotion of business financing and related regulations, as well as German law, in particular the German Anti-money Laundering Act (Geldwäschegesetz – GwG).

(iii) Creation of risk models

European and local regulations (e.g., those imposed by the European Central Bank and the European Banking Authority or the BaFin (German Federal Financial Supervisory Authority) require banks to comply with regulations and directives on solvency control and financial risk, calculating the capital and liquidity required for each transaction and customer at different stages of credit risk management: credit granting, monitoring, management, and recovery. These regulations require customer data to be processed as part of the preparation of specific profiles and risk models.

The legal basis for processing is the fulfillment of a legal obligation to which BBVA is subject, imposed by regulations on creditworthiness assessment in granting loans and prudent management of banks.

4. Sending data to credit information systems and consulting them to determine credit risk

To analyze the economic feasibility of your requests and transactions, BBVA may need to consult

your personal data recorded in the credit information systems managed by the following entities: SCHUFA Holding AG.

Information on data processing for these purposes is provided in the Annex to this Privacy Notice.

The legal basis for processing is BBVA's **legitimate interest** in meeting responsible credit criteria.

5. Fraud prevention

We will use your personal data to prevent fraud situations in the provision of our products and services, as well as to avoid circumstances that could cause damage resulting from fraudulent actions committed by third parties.

The legal basis for processing is BBVA's **legitimate interest** in preventing such situations and the resulting damage for the customer and, if applicable, the bank.

Additionally, to pursue this goal, we may consult data recorded in the SCHUFA Holding AG information system. To prevent and avoid possible fraud attempts, BBVA has joined SCHUFA Holding AG. For this reason, we must consult SHUFA Holding AG and communicate the data you provided in relation to the services provided to you.

The legal basis for processing is BBVA's **legitimate interest** in preventing fraud during the processing of requests, sharing transaction-related data with the entities involved to reduce the risks of identity theft and document manipulation, increasing customer protection, and preventing financial losses, which is in the best interest of society as a whole. Reducing the likelihood of these fraudulent actions leads to a general reduction in crime and the consequences of other crimes, such as money laundering and terrorist financing. Therefore, this system is clearly in the customers' interest, as it aims to protect them against fraudulent practices carried out by third parties, which could harm them as individuals.

6. Risk analysis and commercial purposes

(i) Preparation of commercial and risk profiles

a) Preparation of commercial profiles

For the preparation of marketing profiles, we analyze the following personal data that we collected or generated as part of your relationship with BBVA, such as personal, identification and contact data, sociodemographic data, economic and asset solvency data (ia. financial capacity and solvency), transactional data (including texts by inference from the details of account and card transactions and other transactions such as, origin, destination, concept and third party involved), data from the Aggregation Service (i.e. information from accounts open in other bank that you may link to our BBVA digital banking to see the balance and transactions), if you provide your consent for that

purpose when using this service, communications data (i.e. chat scripts or emails) and data on products and services contracted with or distributed by BBVA (i.e. the balance on the current account or the debit balance and amount of the monthly installment in credit products), and data on the use of the channels that BBVA makes available, including the browsing data we collect and digital behavior data obtained from platforms and media centers assigned to cookies or devices when you consent to our online or mobile cookies policy.

To develop your commercial profile, we apply analytical models that allow us to obtain a deeper knowledge of your preferences, your financial capacity or your financial solvency. By applying these models, we will be able to make suggestions and recommendations to help you manage your finances better.

The data we process will correspond to the last five years.

b) Preparation of risk profiles

To this end, we use your following personal data: identification and contact data, economic and asset solvency data, transactional (including texts of receipts by inference from the details of account and card transactions such as, origin, destination, concept and third party involved), sociodemographic, product and service data, data included in the Information Service if you provide your consent for that purpose when contracting this service, communications data, data on the use of the channels that BBVA makes available for you to manage your products and services, data provided through satisfaction surveys, information resulting from the products and services you have contracted, data on the use of digital channels, including the browsing data we collect and digital behavior data obtained from platforms and media centers assigned to cookies or devices when you consent to our online or mobile cookie policy, and the geolocation of your mobile device when you provide your consent using this device, information on constructed profiles from public utilities companies (energy, communications, etc.).

If you consent, we apply your risk profiles to make suggestions for you to improve the management of your finances, recommendations or offers of products and services such as *dispokredit*, *Pay&Plan* or any other credit product that best suit your profile, and/or apply better conditions to the products and services that you have contracted or that you may contract in the future when you make such a request. Also, we apply your risk profile to anticipate your needs and offer you, where appropriate, products and/or services such as refinancing or increasing the credit limit in *dispokredit* or *Pay&Plan* tailored to your profile, before you request them.

Furthermore, BBVA may, depending on your risk profile based on your creditworthiness and solvency, offer you a maximum financing limit or other product that is of interest to you, subject to your acceptance of the offer and other specific conditions that we will inform you of in each case, such as, consulting your financial positions in credit information systems.

The data we process corresponds to the validity period of the products you have contracted.

Automated decision making: In some cases, the analytical models applied in the preparation of risk profiles may involve automated decisions being made so that the product or service offered is the most appropriate to your personal situation and at the time in question. You may consult the types of decisions that may be adopted in this way at https://www.bbva.de/content/dam/public-web/alemania/documents/general/rechtliche-dokument-e/datenschutz/verhaltens-scoring-fuer-vordefinierte-produkte_eng.pdf, where the relevant data is provided. You also have the right to have an operator intervene to explain the decision taken, obtain your comments and challenge the decision.

You can exercise your right to withdraw your consent at any time using the app, the online banking or sending a request by email to datenschutz@bbva.de or by postal mail to Banco Bilbao Vizcaya Argentaria, S.A., German branch, Customer Service, Neue Mainzer Str. 28 60311 Frankfurt am Main, Germany.

(ii) Offering products and/or services

a) Offering BBVA and/or partner companies' products and/or services

We may contact you and send you information about products, services and offers from BBVA and other companies with which BBVA has entered into collaboration agreements belonging to the following sectors of activity: financial, para-banking, insurance, travel, automotive, telecommunications, utilities, security, IT, education, real estate, consumer and leisure products, professional services and social services.

To send commercial communications, in case you do not provide your consent for marketing and risk profiling, we will use some data related to your relationship with BBVA, usually (but never all together): identification and contact data, sociodemographic data. The analysis will include basic customer segmentation (not intended as profiling) based on data combination. For example, we may perform segmentation considering the following data to send you a commercial communication to offer our Flexible Deposit if you have credited your salary to the BBVA account: the average balance of your BBVA account. In any case, we will not perform any profiling without your consent.

The legal basis is your **explicit consent** to receive commercial communications about BBVA and third-party products and services.

You have the right to withdraw your consent and object to receiving marketing messages from us at any time for the future. The withdrawal of your consent does not affect the lawfulness of processing based on consent before your withdrawal. You can exercise your right to withdraw or to object by sending an email to: datenschutz@bbva.de or using the link included for this purpose in the commercial communications that you receive from us.

b) Offer of products and/or services of BBVA or distributed by BBVA similar to those already contracted (so-called 'Soft-Spam')

Pursuant to and within the limits provided by Section 7 Act Against Unfair Competition, we may send you commercial communications by email or equivalent channels about products and services similar to those you have directly contracted with, or through the Bank, or offer you better conditions and/or lower prices for the products and services you have contracted.

To send commercial communications suitable for you, we will analyze some data generated during your relationship with BBVA, usually a combination of two or more of the following types of data (but never all): identification and contact data, sociodemographic data, communication data, and data on the products and services contracted with or distributed by BBVA and data on the use of the channels and services provided by BBVA. The analysis will include basic customer segmentation (not intended as profiling). For example, we may perform segmentation considering the following data to send you a commercial communication to offer our Flexible Deposit: if you have credited your salary to the BBVA account; the average balance of your BBVA account. In any case, we will not perform any profiling without your consent.

The legal basis is BBVA's **legitimate interest** in (i) promoting its products and services distributed by the Bank (provided they are similar to those you have already subscribed to) and (ii) offering credit products suitable for the customer's risk profile, minimizing default risk, and anticipating your financial needs to offer a loan more quickly, simply, and flexibly, if applicable. We consider this processing to be in your interest and, as part of this analysis, we have considered your rights and freedoms, respecting in particular your fundamental right to protection of your personal data.

7. Data analysis

At BBVA, we analyze information about our customers generated during the contracting and monitoring of the products you contract, as well as the interaction with the Bank for the following purposes:

- refining our internal processes;
- improving and developing new products and services;
- generating statistics, surveys, operational calculations, averages, and/or market studies that may be of interest to BBVA or third parties;
- conducting macro and microeconomic analyses, generating economic indicators, and obtaining aggregated economic information for the benefit of ourselves and third parties;
- improve instruments to combat fraud and prevent money laundering;
- calculation of the customer's repayment capacity for the purpose of prior credit approval;
- commercial purposes, solvency analysis, advice, scoring or propensity models, customer segmentation, estimates, recommendations, pricing models;

- commercial monitoring and generation of supporting reports as part of the decision-making process (without such activities involving profiling).

To achieve the above purposes, BBVA will sometimes create and use tools such as analytical and statistical models, which are created and fed with the information described in the section "What Data Do We Process?"

For this purpose, whenever possible, BBVA replaces identification and contact data (described in the "Data Categories" section) with a code, ensuring that each code and the corresponding customer are kept separate and secure. This is known as data pseudonymization and protects the identity of the subject to whom the information relates.

Additionally, whenever possible, personal data will be subjected to anonymization, tokenization, and aggregation processes, dissociating the information from any natural person. We adopt these technical measures to protect our customers' identities and provide them with guarantees in case of security breaches, preventing them from being identified.

The legal basis is BBVA's **legitimate interest** in (i) continuously improving the quality and functionality of the services offered and our operations, as well as providing you with a broader and better range of products and services; (ii) using large volumes of anonymized information, respecting customer privacy, to have aggregated economic information for internal and external use. We believe this processing is in your interest and, as part of this analysis, we have considered your rights and freedoms, particularly respecting your fundamental right to the protection of your personal data.

If you are an authorized representative of the customer

1. Manage the contracting of the products and services in which you participate, in particular to:

- manage the contract in which you intervene as a representative, by virtue of your relationship with a BBVA customer, within the powers, faculties, or instructions received from such customer;
- send you non-commercial communications to manage your relationship with BBVA;
- Manage your access to the different channels that BBVA makes available to you to manage the services or products in which you participate.

The legal basis is the execution of the contract with the Bank or the management of the related pre-contractual phase.

2. Comply with the legal and regulatory obligations applicable to BBVA, particularly for:

- Prevention of money laundering and terrorist financing.

The legal basis is the fulfillment of legal obligations. For more information, see the previous section "IF YOU ARE A CUSTOMER," par. 2 "Complying with Legal Obligations and Regulations Applicable to BBVA."

3. Fraud Prevention

The legal basis for processing is BBVA's legitimate interest in preventing fraud during the processing of requests, sharing transaction-related data with the entities involved to reduce the risks of identity theft and document manipulation, increasing customer protection, and preventing financial losses, which is in the best interest of society as a whole.

For more information, please refer to the previous section 'IF YOU ARE A CUSTOMER', Section 4 'Fraud Prevention'.

How long will we keep your data?

We will keep your personal data for the duration of the contractual relationship or for the period necessary to achieve the purposes identified for each type of processing. Please note that your business relationship with BBVA is a continuing obligation (Dauerschuldverhältnis) that is designed to last for years.

In addition, 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.

Who we share your personal data with and why? To whom will we disclose your data?

(i) Communications to third parties

BBVA may share your data to the following types of recipients:

- Bank of Spain's Risk Information Centre (CIRBE), e.g. we report risk operations based on compliance with legal obligations (if you are a customer or guarantor);
- Financial Ownership File of the Secretary of State for Economy and Business Support, e.g. we report identifying data and certain products contracted for compliance with the

regulations on the prevention of money laundering and terrorist financing (if you are a customer, representative or authorised);

- national and European Union supervisory authorities, such as BaFin, Bundesbank, Bank of Spain, European Central Bank, European Banking Authority (EBA) and the National Securities Market Commission;
- national authorities and those of other countries, inside and outside the European Union;
- BBVA Group companies;
- to the entities that manage the credit information systems, we communicate the debts that meet the requirements based on compliance with the regulations (if you are a customer or guarantor);
- SCHUFA Holding AG;
- Bundeszentralamt für Steuern;
- to the applicant for an account ownership verification, through the WebID service, with whom you have signed or are going to sign a contract that involves account opening, some payment by you by direct debit or charge to your account, based on the contractual relationship you have with both the requesting entity and BBVA;
- courts, the Public Prosecutor's Office and/or Public Administrations.

(ii) Communications to third parties in the context of operations

BBVA may communicate your personal data to third parties, potential acquirers or interested parties, in those cases in which it is necessary to carry out (i) operations for the sale of assets, debt or liabilities, as well as sales of loan portfolios, credits or other types of financing (all of them with or without mortgage guarantees or guarantees of another nature) and (ii) commercial operations of structural modifications (including mergers, segregations or spin-offs), contributions of assets or liabilities and/or sales or contributions of branches of activity, production or business units, as well as sales or contributions of companies or other entities (including sales of shares, equity interests, etc.), provided that such communication is necessary for the successful completion of the transaction.

The basis for legitimising the communication of your data is the legitimate interest of BBVA and said third parties or potential acquirers or parties interested in the successful completion of the operation, the purpose of the communication being to allow them access to and review of the information necessary for these purposes.

(iii) Communications to Mastercard, Google Pay and Apple Pay

a) Communication to Google Pay and Mastercard:

The communication of the data under this section is necessary for the provision of the service within the [TERMS AND CONDITIONS FOR ADDING A BBVA CARD TO GOOGLE PAY](#) that you will have to accept to access to the service. You will have to authorize BBVA to communicate the transaction data carried out with the BBVA Cards in Google Pay, detailed below, to Google Ireland and Google Inc., in order to:

- Provide you with information in Google Pay on the last ten transactions carried out by you with the BBVA cards included in Google Pay;
- Comply with applicable laws and regulations, detect and combat fraud, improve the Google Pay service and promote its use, meet governmental or regulatory requirements, prepare internal use reports, provide the necessary information so that Google can fulfill its reporting obligations on the use of Google Pay.

Transaction data:

- Transaction amount; transaction date and time; transaction type, currency, authorization status; merchant name, postal code and country, merchant category code, international prefix, sector name and code and its category, application or store indicator, advertising detail, receipt number, barcode number, discount received in the transaction due to the use of loyalty cards (double card), personalized message that the merchant prints on the receipt, input mode, transaction counter, device and transaction code. Transaction status: approved or rejected.

The list of transaction data may be modified in the future, provided they are data of transactions carried out with the BBVA Cards included in Google Pay and are used for the same purposes.

BBVA will anonymize and aggregate the transaction data listed below and the transaction data listed above and communicate them to Google Ireland and Google Inc. in order to improve the Google Pay service. Anonymization and data aggregation are processes through which it is impossible to identify you with proportionate effort.

Transaction data to be anonymized and aggregated:

- Total token provisioning response
- Approved token provisioning responses
- Pending token provisioning responses
- Rejected token provisioning response
- Total number of successful token provisioning
- Total transaction counter
- Total volume counter in Euros
- Authorized transaction counter
- Authorized transaction volume in Euros
- Average transaction size
- Active cards, percentage of provided cards
- Number of authorized transactions on total authorization requests
- Total authorized transaction volume on total authorization requests

- Rejected transactions on total authorization requests with reason for rejection
- Rejected volume in Euros on total requests in Euros
- List of the 100 companies with the highest number of operations
- List of the 100 companies with the highest volume
- List of merchant categories with the highest number of operations
- List of merchant categories with the highest volume in Euros
- Removed tokens
- Suspended tokens
- Fraudulent operations and chargebacks Total volume in Euros, in percentage, by response category (approved, pending)
- List of the 50 merchants with the highest number of fraud and chargeback operations

The data controllers for these data are Google Ireland Limited and Google Inc. You can exercise your rights of access, rectification, deletion, and opposition at Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and Google Inc at 1600 Amphitheatre Parkway, Mountain View, California 94043, USA. Exercising these rights is free.

Similarly, subject to your consent, BBVA will communicate the Card number or PAN to the Card brand (Mastercard) for tokenization purposes to allow you to use Google Pay. Tokenization involves converting the PAN into a "token" code for security reasons, to keep the PAN secret during transactions. To this end, the PAN will be communicated to Mastercard Europe S.A., Chaussée de Tervuren, 198A, 1410 Waterloo, Belgium.

The data communications by BBVA to Google Ireland, Google Inc., and Mastercard, are necessary for the provision of the service. You can revoke your consent to the aforementioned data communication, without retroactive effects, by contacting BBVA via email at datenschutz@bbva.de or by regular mail to BBVA Germany Customer Service: Neue Mainzer Str. 28 60311 Frankfurt am Main Deutschland. In case of withdrawal of consent, it will not be possible to use the BBVA cards in Google Pay.

b) Communication to Apple Pay and Mastercard:

BBVA will communicate the card number or PAN to the card brand (Mastercard) so that it can be tokenized to allow you to make payments through Apple Pay. Tokenization consists of converting the PAN into a "token" code for security reasons, to keep the PAN secret during transactions. For this purpose, the PAN will be communicated to Mastercard Europe, S.A., Chaussée de Tervuren, 198A, 1410 Waterloo, Belgium.

The communication of the data under this section is necessary for the provision of the service within the [TERMS AND CONDITIONS FOR ADDING A BBVA CARD TO APPLE PAY](#) that you will have to accept to access to the service.

You can revoke your consent to the communication of data provided above, without retroactive effects, by contacting BBVA via email at datenschutz@bbva.de or by regular mail by writing to BBVA Germany Customer Service: Neue Mainzer Str. 28 60311 Frankfurt am Main Deutschland. In case of revocation of consent, it will not be possible to use BBVA cards in Apple Pay.

(iv) Service providers

In order to provide you with an adequate service and manage our relationship with you as a customer, at the following address

https://www.bbva.de/content/dam/public-web/alemania/documents/general/rechtliche-dokumente/datenschutz/liste-bbva-dienstleister_eng.pdf

you will find a list by category of the companies that process your data on behalf of BBVA, as part of the services we have contracted from them.

Recipients outside the EU

We also inform you that, for the same purposes indicated in the previous paragraph, certain companies providing services to BBVA and located outside the European Union may access your personal data (international data transfers). Such transfers are made (i) to countries with levels of data protection equivalent to those of the European Union (adequacy decisions adopted by the European Commission under standard contractual clauses and based on other legally provided guarantees); or (ii) agreements with these recipients to ensure that their data processing complies with BBVA's instructions and fully adheres to current data protection regulations (so called Standard Contractual Clauses).

For further information, you can contact the Data Protection Officer by sending an email to: datenschutz@bbva.de

What happens if you do not provide the personal information?

If you do not provide us with personal data when we need to collect it as part of our contract with you or under law, we may be unable to fulfil our contractual obligations to you or we may not be able to comply with relevant laws and regulations.

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

Where the conditions provided by the regulations exist, the following rights can be exercised:

RIGHTS	CONTENT
Access	You can request access and a copy of your personal data processed by BBVA.
Rectification	You can request that we rectify personal data if they are inaccurate.
Deletion	You can request the deletion of your personal data.
<u>Objection</u>	<u>You can object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, based on:</u> <ul style="list-style-type: none">• <u>Legitimate interests (such as marketing); and/or</u>• <u>in the public interest or in the exercise of official authority vested in the controller</u>
Restriction of Processing	You can request that the processing of your personal data be limited when: <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, in electronic format, the personal data you provided and those collected within the contractual relationship with BBVA, and have them transferred to another entity.

CUSTOMER ASSISTANCE CHANNELS

datenschutz@bbva.de

Customer service BBVA Frankfurt: Neue Mainzer Str. 28 6031
Frankfurt am Main Deutschland

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 (Der Hessische Beauftragte für Datenschutz und Informationsfreiheit), Gustav-Stresemann-Ring 1, 65189 Wiesbaden; e-mail: poststelle@datenschutz.hessen.de.

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.

ANNEX

SCHUFA NOTIFICATION ACCORDING TO ART. 14 GDPR

1. NAME AND CONTACT DETAILS FOR THE CONTROLLER AND THE COMPANY DATA PROTECTION OFFICER

SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden, Tel.: +49 (0) 6 11-92 78 0 The company data protection officer may be reached at the address listed above, attention Data Protection Department or by e-mail at datenschutz@schufa.de.

2. DATA PROCESSING BY SCHUFA

2.1 Purposes of data processing and legitimate interests pursued by SCHUFA or a third party
SCHUFA processes personal data in order to provide authorised recipients with information for assessing the creditworthiness of natural and legal persons. Scores are also determined and transmitted for this purpose. It only makes this information available if a legitimate interest in such information has been credibly presented in a specific case and processing is lawful based on a weighing of interests. There is a legitimate interest in particular prior to entry into transactions that carry a financial risk of default. The creditworthiness check serves to protect recipients from losses in the lending business and at the same time makes it possible to protect borrowers from excessive indebtedness by providing advice. In addition, this data is processed for fraud prevention, legitimacy checks, money laundering prevention, identity and age checks, address identification, customer service or risk management as well as setting rates and conditions. In addition to the purposes referred to above, SCHUFA also processes personal data for internal purposes (e.g., assertion of legal claims and defence in the event of legal disputes, continued development of services and products, research and development, in particular to carry out internal research projects (e.g., SCHUFA Credit Compass) or to participate in national and international external research projects related to the processing purposes referred to above, and to safeguard IT security and operations). The legitimate interest related to the foregoing is based on the respective purposes and is otherwise of an economic nature (e.g., efficient task fulfilment, avoidance of legal risks). Anonymised data may also be processed. SCHUFA will inform you of any changes to the purposes for which data is processed in accordance with Art. 14(4) GDPR.

2.2 Legal bases for data processing

SCHUFA processes personal data on the basis of the provisions of the General Data Protection Regulation and the German Federal Data Protection Act. Processing is carried out on the basis of consent (Art. 6(1)(a) GDPR) and on the basis of Art. 6(1)(f) GDPR, insofar as processing is necessary in pursuit of the legitimate interests of the data controller, or of a third party, and does not outweigh the legitimate interests or fundamental rights and freedoms of the data subject. Consents can be withdrawn at any time vis-à-vis the respective contractual partner. This also applies to any consent

granted before the effective date of the GDPR. The withdrawal of the consent does not affect the lawfulness of personal data processing performed prior to such withdrawal.

2.3 Origin of data

SCHUFA receives some of its data from its contractual partners. These comprise institutions, financial companies and payment service providers domiciled in the European Economic Area and in Switzerland as well as in other third countries (provided that the European Commission has issued a corresponding adequacy decision or standard contract clauses have been agreed – these can be read at www.schufa.de) that bear a financial default risk (e.g. banks, savings banks, cooperative banks, credit card, factoring and leasing companies) as well as other contractual partners who use SCHUFA products for the purposes specified under Section 2.1, in particular from the (mail order) trade, e-commerce, service, rental, energy supply, telecommunications, insurance or collection sectors. In addition, SCHUFA processes information from generally accessible sources such as public directories and official notices (e.g., debtor directories, insolvency announcements) or from compliance lists (e.g. lists of politically exposed persons and sanctions lists) as well as from data suppliers. SCHUFA may also store personal data provided directly by data subjects following appropriate communication and review.

2.4 Categories of personal data subject to processing:

Personal data, e.g., last name (if applicable, also prior last names, which will be provided upon separate request), first name, date of birth, place of birth, address, previous addresses | Information on the initiation and execution of a transaction in accordance with the contract (e.g., current accounts, instalment credits, credit cards, accounts exempt from garnishment, basic accounts) | Information on unfulfilled payment obligations, such as claims that are undisputed, due for payment and repeatedly dunned or claims reduced to judgement and their settlement | Information on abusive or other fraudulent conduct such as identity or credit fraud | Information from generally accessible sources (e.g., debtor directories, insolvency announcements) | Data from compliance lists | Information on whether and in which function an entry on a public figure exists in generally accessible sources with corresponding personal data | Address data | Scores

2.5 Categories of recipients of personal data

Recipients are contractual partners within the meaning of Section 2.3 domiciled in the European Economic Area, in Switzerland and, if applicable, in other third countries (provided that a corresponding European Commission adequacy decision is available or standard contract clauses have been agreed – these can be read at www.schufa.de). Additional recipients may include external contractors of SCHUFA according to Art. 28 GDPR as well as external and internal SCHUFA bodies. SCHUFA is also subject to the statutory powers of intervention on the part of state authorities.

2.6 Data retention period

SCHUFA stores information about persons only for a certain period. The decisive criterion for determining this duration is the necessity of processing for the purposes described above. Specifically, retention periods are specified in a Code of Conduct for the Association of Credit

Bureaus “Die Wirtschaftsauskunfteien e. V.”. This and further details on our deletion periods can be viewed at www.schufa.de/loeschfristen.

RIGHTS OF DATA SUBJECTS

In relation to SCHUFA, every data subject has the right of access pursuant to Art. 15 GDPR, the right of rectification pursuant to Art. 16 GDPR, the right to erasure pursuant to Art. 17 GDPR and the right to restrict processing pursuant to Art. 18 GDPR. SCHUFA has set up a Private Customer Service Center for requests by data subjects which can be reached in writing at SCHUFA Holding AG, Private Customer Service Center, PO Box 10 34 41, 50474 Cologne, Germany, by telephone at +49 (0) 6 11-92 78 0 and via an inquiry form at www.schufa.de/rueckfrageformular. In addition, it is also possible to contact the supervisory authority responsible for SCHUFA, the Commissioner for Data Protection and Freedom of Information for the State of Hesse. Consents can be withdrawn at any time vis-à-vis the respective contractual partner.

According to Art. 21(1) GDPR, an assertion to data processing may be made based on the particular situation of the data subject. The right to object also applies to the profiling described below.

An objection can be submitted informally and for example be addressed to SCHUFA Holding AG, Privatkunden ServiceCenter, PO Box 10 34 41, 50474 Cologne.

3. PROFILE DEVELOPMENT (SCORING)

In addition to providing information about data stored about a person, SCHUFA supports its contractual partners by developing profiles, in particular by means of “scores”.

The generic term profile development concerns the processing of personal data by analysing certain aspects relating to an individual. Particular importance is attached to “scoring” in the context of credit assessment and fraud prevention. However, scoring can also serve to fulfil other purposes mentioned in Section 2.1 of this SCHUFA Notification. Scoring is the process of forecasting future events and behaviour on the basis of information that has been collected and past experience. An assignment is made to statistical groups of persons who had similar data bases in the past on the basis of personal data maintained by SCHUFA that concern an individual.

In addition to the logistic regression method that has been used for many years in the area of credit scoring, SCHUFA can also use scoring methods from the categories of complex non-linear methods or expert-based methods. It is always of particular importance to SCHUFA that the methods used are mathematically and statistically recognised and scientifically sound. Independent external experts have confirmed the scientific validity of these methods to us. In addition, procedures in use are disclosed to the competent supervisory authority. For SCHUFA, regularly checking the quality and currency of procedures in use, and making appropriate updates, is a matter of course.

Creditworthiness scores are determined by SCHUFA on the basis of data stored by SCHUFA relating to a specific person. These data are likewise shown in the data copy according to Art. 15 GDPR. An assignment is then made to statistical groups of persons who had similar data bases in the past on the basis of personal data maintained by SCHUFA. Stored data is aggregated into so-called data types that may be viewed at [ww.schufa.de/scoring-faq](https://www.schufa.de/scoring-faq) in order to determine creditworthiness scores. Additional data types may be included for determining scores for other purposes. Information on nationality or particularly sensitive data in accordance with Art. 9 GDPR (e.g., ethnic origin or information on political or religious attitudes) is not retained by SCHUFA and is therefore not available for profile development. Similarly, the assertion of rights of data subjects based on the GDPR, such as access to data concerning the data subject maintained by SCHUFA under Art. 15 GDPR, has no influence on profile development. In addition, SCHUFA takes the provisions of section 31 Federal Data Protection Act (BDSG) into account when computing a score.

The probability with which a person will repay a mortgage loan, for example, does not have to correspond to the probability with which they will pay a mail order bill on time. For this reason, SCHUFA offers its contractual partners various sector-specific or even customer-specific scoring models. Score are constantly changing, as data stored by SCHUFA is also constantly changing. Thus, new data are added while others are deleted based on retention periods. In addition, the data itself also changes over time (e.g., the duration of a business relationship), so that changes can occur even without new data.

Please note: In principle SCHUFA does not make any decisions itself. It merely supports affiliated contractual partners by providing information and creating profiles. The decision for or against a transaction, however, is made solely by the direct business partner. If a contractual partner relies significantly on SCHUFA scoring when deciding on the establishment, execution or termination of a contractual relationship, the provisions of Art. 22 GDPR apply. In this case, SCHUFA scoring can, for example, help to quickly process everyday credit transactions; however, it can also lead to a contractual partner making a negative, possibly negative decision on the establishment, execution or termination of a contractual relationship. Further information on how a contractual partner uses SCHUFA scoring can be obtained from the respective contractual partner.

Further information on profile formation and scoring at SCHUFA (e.g., on the procedures currently in use) can be found at www.schufa.de/scoring-faq.

Last revised: April 2025