

Main Aspects of the General Privacy and Data Protection Policy

What is the context of the Policy?

Banco Bilbao Vizcaya Argentaria, S.A. (hereinafter, "**BBVA**" or the "**Bank**") is the parent company of an international financial group, composed of legally autonomous companies, primarily engaged in banking activities and other activities directly or indirectly related to them (hereinafter, the "**BBVA Group**" or the "**Group**").

For the development of its activity, the BBVA Group considers data to be a critical and strategic asset, especially in an environment characterized by its complexity, technological evolution, and regulatory changes. In this context, and as a result of the strategic reflection process carried out to continue deepening the Group's transformation and adapting to the major trends that are changing the world and the financial industry, the Strategic Plan defined by BBVA's Board of Directors included data as one of its strategic priorities.

In this sense, to ensure that the necessary measures are in place to safeguard the privacy and protection of the data concerning individuals and legal entities that engage with BBVA and the various companies that make up the Group, and always respecting the regulatory requirements that apply, BBVA's Board of Directors establishes and approves the General Privacy and Data Protection Policy.

What are the key concepts to understand the Policy?

- **Privacy:** The right of individuals and legal entities for their information to be collected, shared, and used in accordance with applicable regulatory requirements. Within the concept of privacy, the protection of personal data refers to the set of measures aimed at ensuring that individuals have control over their data and that personal data processing is carried out in accordance with applicable regulations, to protect the public freedoms and fundamental rights of the data subjects.
- **Data:** Any specific information related to an individual (identified or identifiable) or legal entity on which the Group performs some type of processing.

- **Personal data:** Any information about an identified or identifiable individual whose identity can be determined, directly or indirectly, either through an identifier (for example, a name, identification number, location data, or an online identifier) or through one or more elements specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- **Data subject:** The individual or legal entity to whom the data refers.
- **Data processing:** Any operation or technical procedure, whether automated or not, that allows the collection, storage, processing, modification, consultation, use, cancellation, blocking, or deletion of data, as well as data transfers resulting from communications, consultations, interconnections, and transfers.

What is the main objective of the Policy?

The objective of the Policy is to establish the general principles and basic guidelines for the management and control that the Group must follow in terms of privacy and data protection of individuals and legal entities in the processes and data processing carried out within the BBVA Group, in compliance with applicable regulations.

What is the scope of the Policy?

The Policy applies to BBVA and the Group companies over which the Bank has management control (the "**Group Entities**" or "**Entities**") and extends to all data of individuals and legal entities (clients, non-clients, employees, shareholders, suppliers, partners, etc.) on which BBVA and the Group Entities carry out any data processing operations.

The Bank will promote the application of this Policy to other persons who, not being part of the Group, provide services or carry out activities on behalf of any BBVA Group Entity.

The basic guidelines contained in the Policy, as well as the specific assignment of roles and responsibilities, associated processes, and executive committees, will be developed through Internal Regulations.

What are the principles of the Policy?

The principles governing privacy and data protection in the BBVA Group are as follows:

- **Lawfulness of processing principle:** Data processing within the Group will be carried out lawfully, in compliance with applicable legislation in each jurisdiction.
- **Confidentiality principle:** Data must be maintained and kept in such a way as to guarantee its confidentiality. In particular, no information or data to which access is granted in the course of performing activities may be disclosed, transmitted, or revealed to third parties, nor may such information be used for personal gain, unless express or contractual authorization is provided, or the information is requested by an administrative or judicial authority. This obligation will remain in force even after the contractual relationship has ended.
- **Data accuracy principle:** Data must always be adequate and truthful, and when necessary, will be updated, adopting the necessary measures to delete or rectify inaccurate data.
- **Data retention principle:** Data must be retained, when appropriate, in compliance with the retention periods established in applicable regulations. When defining the data retention periods, regulatory requirements in each jurisdiction, as well as possible exceptions that may apply in each case, will be taken into account.

In addition to the above principles, the following principles will govern the protection of personal data:

- **Transparency principle:** Measures will be established to provide the data subject with all the necessary information regarding the conditions of the data processing that affects them. The information must be provided concisely, transparently, intelligibly, and in an easily accessible way, using clear and plain language.
- **Processing limitation principle:** The data collected must be adequate, relevant, and limited to what is necessary for the purposes for which they will be processed. Data cannot be used for purposes other than those informed, nor can additional data be processed that may not be necessary for the purposes of the processing.

What are the main guidelines of the Policy?

Privacy and data protection management will be based on the following general guidelines:

Organization and governance

- Privacy and data protection processes will be aligned with the Group's structure and objectives, always maintaining the commitment to preserving the privacy and protection of data subjects in accordance with applicable legislation.
- The governance structure for privacy and data protection will be designed to involve all levels of the organization to reconcile priorities, streamline conflict resolution, and promote support for data accuracy and protection.
- Roles and responsibilities of the various areas involved in the governance of privacy and data protection within the Group will be defined, applying proactive responsibility and promoting the necessary measures to enhance privacy and protection.

Control:

- The standards and procedures associated with data and privacy management will be periodically evaluated to ensure compliance. The necessary controls to promote and assess their proper implementation will be incorporated into the Group's global control frameworks.
- To ensure that data is fit for purpose, categories will be defined to allow their segmentation based on their level of confidentiality and criticality.
- Specific metrics and controls will be established to determine the effectiveness of privacy and data protection measures, aiming to measure risks and implement a continuous improvement process.

Training:

- To ensure that all members of the Group are aware of the value of information and the need for data protection and privacy, periodic training will be conducted on these matters.

Which body approves the Policy?

The Policy has been approved by BBVA's Board of Directors, following analysis by the Risk and Compliance Committee.

How is compliance with the Policy monitored?

Compliance with both the Policy and its development will be monitored in accordance with the internal control model established by the Group at any given time, aimed at the proper management of risks, which is structured based on three independent lines of defense. The various control functions will cooperate actively and regularly in supervising the application of the Policy, in accordance with their conferred responsibilities.

Additional Privacy and Data Protection Information

In addition to the content of BBVA's internal General Privacy and Data Protection Policy, the following are relevant aspects covered in the rest of BBVA's internal regulations and the [Data Protection Policy for customers](#) and other data subjects whose personal data may be processed by BBVA.

What rights can be exercised at BBVA regarding data protection?

BBVA grants the right of access, rectification, deletion, objection, limitation of processing, and data portability for individuals (customers, non-customers, employees, shareholders, suppliers, partners, etc.).

Can BBVA collect personal data from third parties?

BBVA does not collect personal data from third parties unless required by law or in accordance with lawful circumstances.

How long does BBVA retain personal data?

Personal data is kept for the time necessary to fulfill the purpose for which it is collected. Personal data is also retained for an additional period as long as it is necessary to comply with any legal or contractual obligations, or for the defense of the Entity, being kept blocked when required by applicable local regulations.

Who is the contact person at BBVA for data protection matters?

The designated person or department for privacy and data protection issues is the Data Protection Officer (DPO) of BBVA, who can be contacted through the email address available in each country.

Are there data protection training plans at BBVA?

BBVA defines, delivers, and periodically reviews internal training and awareness actions on personal data protection, enabling employees (full-time and part-time) to understand their obligations and additionally comply with regulatory training requirements.

Suppliers providing services through contractors (individuals) will implement training and awareness plans on information security, including all employees providing services to BBVA. The supplier must explicitly develop an awareness plan on the importance of personal data and its confidentiality. The supplier must also explicitly implement a training plan on the importance of secure code development.

What happens in case of non-compliance with privacy regulations?

In the event of a breach of the Privacy and Data Protection Policy that could constitute a violation of an employment contract, BBVA has a disciplinary system that can lead to sanctions, including termination of the employment relationship, as applicable, and in accordance with the applicable law.

Non-compliance with the professional secrecy obligations regulated in this area and in the Personal Data Protection regulations may result in the imposition of disciplinary sanctions provided for in the Collective Agreement, in addition to the civil liability for damages that may also apply.