

FACILITEA SELECTPLACE, S.A. SOCIEDAD UNIPERSONAL PRIVACY POLICY

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1. How we process your personal data

To manage your relationship with us, we will process your personal data for various reasons, always respecting your rights and with complete transparency.

The processing of your data may vary depending on the degree of identification established in the contractual relationships that you have with us, and therefore:

- If you have registered in Facilitea using means of identification provided by CaixaBank, S.A. ("CaixaBank"), if you finance the purchase of a Facilitea product through Facilitea transaction with CaixaBank or contract a renting product, we will consider you a fully identified customer ("Identified Facilitea Customer") and we will apply certain types of processing, explained in this Privacy Policy.

In section 6 (What types of processing we carry out using your data) we will explain the types of processing that apply to an Identified Facilitea Customer.

- If you are a user of Facilitea services where registration is not required, and/or if you register in Facilitea without using the means mentioned in the previous section, as occurs in the user registration and the purchase of products and services on the Facilitea website, we will consider you an unidentified user ("Facilitea User Customer"), and we will apply certain types of processing, explained in this Privacy Policy.

In section 6 (What types of processing we carry out using your data) we will explain the types of processing that apply to an Facilitea User Customer.

This Privacy Policy, which you can access at any time at <http://www.facilitea.com/politicaprivacidad>, contains all the details about how we will use your data.

The main legislation regulating the processing of your personal data is as follows:

- > Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter the GDPR).
- > Organic Law 3/2018 of 5th December on the Protection of Personal Data and the Guarantee of Digital Rights (hereinafter the LOPD).

2. Who processes your data

Data controller: the data controller of your personal data in your relations with us is Facilitea (Facilitea Selectplace, S.A.U.), with tax ID number (NIF) A-58481730 and registered office at Gran Via de les Corts Catalanes, 159-163, Barcelona.

Joint data controllers: for certain types of processing we will jointly process your data with other companies. We will jointly decide on the purposes and the resources used that make us joint data controllers.

The types of processing for which Facilitea will jointly process your data with other companies are described in detail in section 6 "What types of processing we carry out using your data".

We hereby provide you with the list of joint data controller companies and essential aspects at: www.caixabank.es/empresasgrupo.

3. Data Protection Officer

Facilitea and CaixaBank Group companies have appointed a **Data Protection Officer**, who will deal with any matters related to the processing of your personal data and the exercising of your rights.

You can contact the Data Protection Officer to send your suggestions, queries or claims at this address: www.caixabank.com/delegadoprotecciondedatos.

4. Exercising rights and submitting complaints to the Spanish Data Protection Agency (AEPD)

You can exercise your rights of access, rectification, objection to processing, erasure, restriction, the portability of your personal data, to withdraw your consent and not be subject to automated decision-making, in accordance with the law through the following channels:

- > At our CaixaBank branches open to the public;
- > in the customer area at www.facilitea.com;
- > by email to: www.facilitea.com/ejerciciodederechos, and
- > by post to: Apartado de Correos n.º 209 de Valencia, CP 46080.

Additionally, you can submit complaints to the Spanish Data Protection Agency (www.agpd.es).

5. Data processed

The list of the data used by the various types of processing in this Privacy Policy is specifically explained in each of the types of processing included in section 6.

6. What types of processing we carry out using your data

The types of processing that we will carry out using your data are varied and are for various purposes and legal reasons.

- Processing based on your consent.
- Processing required for the performance of contractual relationships
- Processing required to comply with regulatory obligations
- Processing based on the legitimate interest of Facilitea or of CaixaBank Group companies.

Some of the above types of processing we will carry some out solely with regard to Identified Facilitea Customers and others solely with regard to Facilitea User Customers. We will apply the other types of processing to all Facilitea customers (Identified Facilitea Customers and Facilitea User Customers).

In the information included about each type of processing, we will specifically inform you whether it is with regard to Identified Facilitea Customers, to Facilitea User Customers or to all Facilitea customers.

In addition to the types of processing listed below, we may carry out specific types of processing not included in this policy. These types of processing may be carried out in order to manage your orders for products or services. We will give you detailed information about these types of processing when you place a specific order.

7. TYPES OF PROCESSING THAT WE WILL CARRY OUT WITH REGARD TO IDENTIFIED FACILITEA CUSTOMERS

7.1 Processing based on your consent.

We will **only carry out this processing with regard to Identified Facilitea Customers** and the legal basis for this processing is your **consent**.

We may have requested this consent through various channels, through our digital channels, at CaixaBank or through any of the CaixaBank Group companies that are joint data controllers for a specific processing.

If we have never asked you for your consent, this processing will not apply to you.

You can view the consent you have given or denied and change your decision at any time free of charge on the Facilitea website (www.facilitea.com), in your private area, at CaixaBank branches and at the offices of any of the CaixaBank Group companies that are joint data controllers.

The types of processing based on your consent are listed below from (A) to (C). We will indicate for each of them:

- A description of the purpose.
- The details of the type of data or processed data.
- Information about the use of profiling, if applicable.
- Other necessary information about the processing.
- Whether or not the processing is carried out jointly with other CaixaBank Group companies.

Customisation of the product and service offering based on the analysis of your data

Purpose: If we have your consent, we will create a marketing profile for you in order to define your preferences and offer you products and services that we have forecast might interest you.

By processing your data, we will be able to make customised offers that we believe may be of more interest to you than generic offers.

Furthermore, if you authorise us to send you messages about our range of products and services by other channels (see section 6.1.B of the Privacy Policy), you will also receive our offers through the channels you indicate.

Data processed: For this processing, we will not use data about your ethnicity or race, your political opinions, religious or philosophical convictions, union membership, genetic data, biometric data that can identify you, health data or data relating to your sex life or sexual orientation.

The data we will process for this purpose are:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, nationality, date of birth, communication language, identification document.
- **Data about your professional or work activity and socio-economic data:** data related to your job, income or remuneration, household, level of education, assets, tax and fiscal data.
- **Contract data:** contracted or ordered products and services (own or third-party), status as contract holder, authorised party or representative for a contracted product or service, categorisation according to regulations regarding securities markets and financial instruments (MiFID category), information on investments made and their performance and information and transactions related to your financing transactions.

- **Basic financial data:** current and historical balances for products and services and payment history of contracted products and services (own or third-party).
- **Third-party data from statements and receipts from current accounts and payment accounts:** information on entries and transactions that third-party issuers make to your accounts, including transaction type, issuer, amount, and the description as it appears on receipts and statements for debit, credit and prepaid card transactions.
- **Data on whether or not you are a CaixaBank shareholder:** if you have CaixaBank shares or not.
- **Data on communications maintained with you:** data obtained in chats, communication walls, video conferences, telephone calls or any other equivalent means of communication.
- **Our browsing data:** if you have accepted the use of cookies and similar technologies on your browsing devices, data obtained from your browsing of our websites or applications and your browsing history on these websites: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address, etc.
- **Geographical data:** when authorised by you in the settings of applications, data on the location of the businesses where you make card transactions and the geolocation data of your mobile device provided by the installation and/or use of our mobile applications.
- **Data obtained from other data processing provided for in this policy:**
 - Risk assessment data or scoring: for financing or payment by instalments transactions, we will forecast your capacity to pay or not pay, or the risk limits, by applying statistical and mathematical models using your data (processing defined in section 6.3.B).
- **Data obtained from the execution of statistical models:** we use the results of applying mathematical modelling to customer data, which helps us forecast your consumer habits and contracting preferences/tendencies.
- **Demographic and socio-economic data:** statistical data not related to specific people but geographical areas, age sectors or professional activity sectors, which we will use to put them into context with customer information.
- **Data on properties and vehicles associated with you:** these are data obtained from the land registry and real estate registry and basic data on vehicles obtained from the Spanish Traffic Directorate, which we will use to complement the information about your properties and vehicles.
- **Data on directors, functional officers and corporate relationships:** these are data taken from the INFORMA databases that we will use to complement the information about your activities.
- **Data on agricultural subsidies and insurance:** these are data published by the Spanish Agricultural Guarantee Fund (FEGA) and the State Agricultural Insurance Institution (ENESA).
- **Data from third-party companies to which you have given your consent to share data with us:** your data processed by other companies with which we have agreements, and which you have authorised to share your information with us.
- **Browsing data:** if you have accepted the use of cookies and similar technologies on your browsing devices, data obtained from your browsing of third-party websites or applications and your browsing history on these websites: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address.
- **Social media or internet data:** social media or internet data that you authorise us to view.

Use of profiling: We will create a marketing profile that we will use to customise the products and services we offer you:

- **Purpose of the profile:** The profile that we will create using the information about you will be used by us to identify the products and services we think may interest you and make you customised rather than generic offers.
- **Consequences:** If you authorise the processing of your data for this purpose, we will use marketing profiles to decide which products or services to offer you. If you do not give your authorisation, we will not use your information to customise our marketing offer.

We will never use this profiling to refuse any product or service, or to set credit limits. Refusal to accept this data processing does not prevent, limit or condition your access to our full catalogue of products and services, which is always available to you.

If you order any product or service, we will assess your order in accordance with our usual procedures. The acceptance or refusal of the analysis of your data for the purpose of customising the product and service offering will not affect this assessment.

Neither will refusing this processing prevent us from contacting you in order to manage your products and services.

- **Logic:** The profile of a customer is calculated based on the data indicated in the "processed data" section.

Mathematical formulas obtained from past behaviour observed in clients of similar characteristics are applied to these data to infer the customer's future behaviour. These mathematical formulas allow us to determine the importance of all the data processed in the final result of the applicant's profile.

This final result is the probability that the customer will be interested in a product or service.

Other relevant information: The following section includes other relevant data processing information:

- **Preliminary check of your repayment ability:** When we offer you products or services that involve payment in instalments, we will first check your repayment ability.

We will do this in accordance with the content of section 6.3.B.

The aim is to offer you a suitable credit limit and repayment term based on our knowledge of your financial situation. We will do all the above in accordance with regulations on the prudential supervision and solvency of credit institutions and responsible lending.

Not accepting this processing does not prevent, limit or condition your access to our catalogue of products and services. If you place an order, we will evaluate your order in accordance with our procedures.

- **Duration of data processing:** We will only process your data if you have given us your consent to do so. Your consent will remain in force until you withdraw it. If you cancel all your products or services **but forget to revoke your consent, we will do so automatically.**
- **Creation of management reports and mathematical models:** The processed data and results of this processing may also be used to prepare management reports and mathematical models, in accordance with the content of section 6.5.B.

Joint data controllers: The following CaixaBank Group companies will jointly process your data for this processing.

- CaixaBank, S.A.

- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- Nuevo Micro Bank, S.A.U.
- Facilitea Selectplace, S.A. Sociedad Unipersonal
- ImaginersGen, S.A.
- VidaCaixa, S.A.U. de Seguros y Reaseguros

You can find the essential elements of the joint data controller agreements at: www.caixabank.es/empresasgrupo.

B. Communication of the product and service offering through channels

Purpose: You can choose other channels through which we will communicate our offering of products and services, both customised and non-customised, according to what you have indicated to us in section A above.

If we have your consent, we will offer you our products and services through the channels you indicate:

- website, app and email
- letter
- telephone.

The data we will use will vary according to the following:

- If we do not have your consent to customise our commercial offer (see section 6.1.A), we will use only your identifying and contact data to send you generic offers.
- If you have given us your consent to customise our commercial range (see section 6.1.A), we will also use the information in your marketing profile to send you customised offers.

Data processed: For this processing, we will not use data about your ethnicity or race, your political opinions, religious or philosophical convictions, union membership, genetic data, biometric data that can identify you, health data or data relating to your sex life or sexual orientation.

The data we will process for this purpose are:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, communication language.
- **Data obtained from other data processing provided for in this policy:**
 - **Data from the customisation of the product and service offering based on the analysis of your data:** If you have given us your consent to customise our commercial offer (see processing 6.1.A), we will also use the information in your marketing profile to send you customised offers.

Other relevant information: The following section includes other relevant data processing information:

- **Duration of data processing:** We will only process your data if you have given us your consent to do so. Your consent will remain in force until you withdraw it. If you cancel all your products or services but forget to revoke your consent, we will do so automatically.

Joint data controllers: The following CaixaBank Group companies will process your data jointly for this processing:

- CaixaBank, S.A.

- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- Nuevo Micro Bank, S.A.U.
- Facilitea Selectplace, S.A. Sociedad Unipersonal
- ImaginersGen, S.A.
- VidaCaixa, S.A.U. de Seguros y Reaseguros

You can find the essential elements of the joint data controller agreements at: www.caixabank.es/empresasgrupo.

C. Sharing of your data with other companies

Purpose: If we have your consent, we will share your data with other companies so that they can send you offers about their products and services.

These data will vary based on the following:

- If we do not have your consent to customise our commercial offering (see section 6.1.A), we will only share your identification and contact data with these companies.
- If we have your consent to customise our commercial offering (see section 6.1.A), we will also disclose information about your marketing profile and information deduced regarding your payment or default probability, or concerning risk limits.

If we do not have your consent we will not disclose your data to other companies.

These companies with which we may share your data engage in the following activities:

- banking
- investment services
- insurance and reinsurance
- venture capital
- real estate
- highways
- sale and distribution of goods and services
- consultancy services
- leisure and
- charity-social actions

Data processed: For this processing, we will not use data about your ethnicity or race, your political opinions, religious or philosophical convictions, union membership, genetic data, biometric data that can identify you, health data or data relating to your sex life or sexual orientation.

The data we will process for this purpose are:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, nationality, date of birth, communication language, identification document.
- **Data obtained from other data processing provided for in this policy:**
 - **Data from the customisation of the product and service offering based on the analysis of your data:** If you consent to us customising our commercial offering (see section 6.1.A), we will also use the information from your marketing profile to send you customised offers.

Other relevant information: The following section includes other relevant data processing information:

- **Data sharing information:** If we reach an agreement to disclose your data, the company that receives the data will inform you of this disclosure. It will also inform you about the data received and details about the processing it intends to carry out.
- **Duration of data processing:** We will only process your data if you have given us your consent to do so. Your consent will remain in force until you withdraw it. If you cancel all your products or services but forget to revoke your consent, we will do so automatically.

Joint data controllers: The following CaixaBank Group companies will process your data jointly:

- CaixaBank, S.A.
- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- Nuevo Micro Bank, S.A.U.
- Facilitea Selectplace, S.A. Sociedad Unipersonal
- ImaginersGen, S.A.
- VidaCaixa, S.A.U. de Seguros y Reaseguros

You can find the essential elements of the joint data controller agreements at: www.caixabank.es/empresasgrupo.

8. TYPES OF PROCESSING THAT WE WILL CARRY OUT WITH REGARD TO FACILITEA USER CUSTOMERS

8.1. Processing based on the legitimate interest of Facilitea

We will only carry out this processing with regard to **Facilitea User Customers** and this processing is carried out to achieve the **legitimate interests** of Facilitea or a third party, **provided that our interests do not take precedence over your interests or your fundamental rights and freedoms**, in accordance with art. 6.1.f) of the General Data Protection Regulation (GDPR).

Before carrying out this processing, we will consider the balance between your rights and our legitimate interest. We will only carry out the processing in cases where our interest prevails over your rights and freedoms. You can ask about the consideration of the legitimate interest of a processing operation at any time by emailing your enquiry to delegado.proteccion.datos@caixabank.com

Please remember that you can object to processing carried out due to legitimate interest. If you believe that Facilitea should consider a personal situation or reason to cease processing your data, you may make request this simply and free of charge through the channels mentioned in section 4.

The types of processing are listed below, from (A) to (C). For each item, we will indicate: the legitimate interest of Facilitea, a description of the purpose, the type of data processed if applicable, information on the use of profiling, other relevant processing information.

A. Product and service offering.

Legitimate interest: To communicate the product and service offering that we market to users that have shown an interest in them or have purchased similar products in the past.

Purpose: To select a target market for the offer of products and services through marketing communications sent by electronic channels.

Data processed:

- **Identification and contact data:** full name, gender, telephone and email contact information, communication language, identification document.
- **Contract data:** contracted or ordered products and services.
- **Basic financial data:** payment history of contracted products and services.
- **Our browsing data:** data obtained from your browsing of our websites or, if applicable, applications and your browsing history on these websites: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address, if you have accepted the use of cookies and similar technologies on your browsing devices.
- **Browsing data:** data obtained from your browsing of third-party websites or, if applicable, mobile applications and your browsing history on them: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address, if you have accepted the use of cookies and similar technologies on your browsing devices.

Other relevant information:

- **Right of objection:** You can object to this processing simply and free of charge through the channels indicated in section 4.

If you object to the processing, we hereby inform you that we will cease the processing without requiring that you tell us the reason.

Refusal to accept this processing will not prevent us from contacting you for the management of the products and services you have contracted.

Data controller: The data controller of this processing is Facilitea.

B. Customer surveys

Legitimate interest of Facilitea: To discover the degree of satisfaction of its users. This allows it to improve the products and services it offers, in order to guarantee its users an adequate experience that meets their expectations.

Purpose: To administer customer surveys to users to determine how satisfied they are with the company's services and to improve internal processes if necessary.

Data processed:

- Identification and contact data.
- Contract data.
- Our browsing data.

Other relevant information:

- **Right of objection:** You can object through the channels indicated in section 4.
If you object to the processing, we hereby inform you that we will cease the processing without requiring that you tell us the reason.
- **Duration of data processing:** We will cease this processing, with no other additional requirement, if you exercise your right to object.

Data controller: The data controller of this processing is Facilitea.

C. Activity tracking of the Facilitea Homes portal

Legitimate interest of Facilitea: To check the correct activity of the Facilitea Homes portal and track the objectives defined by the CaixaBank Group.

Purpose: To analyse the activity of the Facilitea Homes portals and applications for mortgage financing and contracts entered into at CaixaBank by users of the portal, in order to improve the

portal's activity and check the fulfilment of the business objectives defined by the CaixaBank Group. The reports we prepare for this analysis are not used to make commercial offerings to users.

Data processed:

- Identification and contact data
- Contract details: contracted or ordered products and services.

Other relevant information:

- **Data disclosure:** For this processing, Facilitea will disclose your identification and contact data to CaixaBank, with the exclusive purpose of tracking and analysing any mortgage financing contracted through CaixaBank. These data will not be used by Facilitea or by CaixaBank to make commercial offerings.
- **Right of objection:** If you believe that Facilitea should cease using your data due to a personal reason, you can request this simply and free of charge through the channels indicated in section 4.

Data controller: The data controller of this processing is Facilitea.

9. TYPES OF PROCESSING THAT WE WILL CARRY OUT WITH REGARD TO ALL FACILITEA CUSTOMERS

9.1 Processing required for the performance of contractual relationships

We will carry out this processing with regard to all Facilitea customers (Identified Facilitea Customers and Facilitea User Customers) and it is necessary in order to manage the contracts of the products and services that you order or in which you are a party, or to apply pre-contractual measures if you request them. We will carry out the processing based on art. 6.1. b) of the General Data Protection Regulation (GDPR).

This processing is necessary for you to take out and maintain your contracts with us. If you object to this processing, we will have to end these relationships, or we will not be able to establish them if they have not yet started.

The types of processing required for the management of your contracts are listed below, from (A) to (C). For each item, we will indicate: the purpose, the details of the processed data, information on the use of profiling, if applicable, other relevant processing information whether or not the processing is carried out jointly with other CaixaBank Group companies.

A. Signing, maintenance and performance of contractual relationships

Purpose: The purpose of this data processing is to formalise and maintain the contractual relationship established between you and Facilitea. This means that Facilitea will process your data in order to:

- Manage your requests and orders.
- Carry out the steps prior to entering into a contract (what is called "pre-contractual relationships") or the purchase of a product or service.

This data processing means that Facilitea will only collect the information it needs to:

- Formalise the relationship with you or manage your order.
- Check if the product or service you wish to contract is suitable for you.
- Correctly maintain your contracts and/or purchases.

The processing activities involved in signing, maintaining and performing the contractual relationships are:

- The collection and recording of your data and documents required for the purchase of the ordered products or services.
- Managing the products and services that you have contracted with us. This includes dealing with your operational queries and managing incidents arising from the product's delivery. Also all the formalities that are necessary in order to comply with the commitments accepted in the contracting of specific products or services.

Data processed:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, nationality, date of birth, communication language, identification document.
- **Contract details:** contracted or ordered products and services (own or third-party).
- **Basic financial information:** payment history of contracted products and services.
- **Data obtained from other data processing provided for in this policy:**
 - Risk assessment data or scoring (processing defined in section 6.3.B).

Data controller: The data controller of this processing is Facilitea.

B. Analysis of solvency and repayment ability for the granting of finance for products that involve deferred payment by instalments and the monitoring of credit risk

Purpose: The purpose of this data processing is to assess whether applicants or contract holders of products or services that involve deferred repayment by instalments can pay the agreed instalments.

We will provide you with details about this processing when you apply for one of the aforementioned products or services or in the relevant contract for said product or service.

The processing operations that we carry out for the internal management of risk and to prevent defaults are as follows:

- Analysis of the repayment ability of applicants when granting transactions for the aforementioned products and services.
- Analysis of the repayment ability of the contract holders of the aforementioned products and services, while these contracts are in force.

Data processed:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, nationality, date of birth, communication language, identification document.
- **Data on your professional or work activity and socio-economic data:** details related to your job, income or remuneration, household, level of education, assets, tax and fiscal data.
- **Contract data:** contracted or ordered products and services, status as contract holder, authorised party or representative for a contracted product or service, categorisation according to regulations regarding securities markets and financial instruments (MiFID category), information on investments made and their performance and information and transactions related to your financing transactions.
- **Basic financial data:** current and historical balances for products and services and payment history of contracted products and services.
- **Third-party data from statements and receipts from current accounts and payment accounts:** information on entries and transactions that third-party issuers make to your

accounts, including transaction type, issuer, amount, and the description as it appears on receipts and statements for debit, credit and prepaid card transactions.

- **Data obtained from the execution of statistical models:** we use the results of applying mathematical modelling to client data, which helps us combat fraud, detect your consumer habits, preferences or product tendencies for regulatory compliance, and manage the operations regarding your products and services.
- **Data in credit information systems:** obtained by consulting the Asnef and Badexcug credit reporting databases, which provide information on debts, financial solvency and credit (debtor, creditor and debt).
- **Equifax RISK SCORE data:** for financing or payment by instalments transactions, we will use the result provided by this forecast system for the probability of default at 12 months, which is calculated by applying statistical and mathematical models to your data (national ID, postcode of residence and data in credit information systems).
- **CIRBE data:** we will check if you have risks (financing) with other institutions. We will obtain these data from the Bank of Spain Credit Reporting Agency (CIRBE).
- **Demographic and socio-economic data:** statistical data not related to specific people but geographical areas, age sectors or professional activity sectors, which we will use to put them into context with customer information.
- **Data on properties and vehicles associated with you:** these are data obtained from the land registry and basic data on vehicles obtained from the Spanish Traffic Directorate, which we will use to complement the information about your properties and vehicles.
- **Information obtained from public access sources and public records:** data provided by public access sources and public records to compare the information you provide to enter into, maintain and fulfil contractual relationships. Additionally, information from the Equifax Bankruptcy database, the Public Insolvency Register, additional contact data obtained from telephone directories (White Pages, Yellow Pages, Lleida.net) and the INFORMA database, to contact our customers in the event of a breach of contractual obligations.

Use of profiling: We will prepare a risk profile that we will use exclusively to ascertain if you are able to repay the agreed instalments.

- **Purpose:** This profiling is used to:
 - determine the probability of default when granting transactions.
 - increase or reduce the amount granted in your current transactions.
 - calculate the provisions and capital requirements applicable to the CaixaBank consolidated group.
- **Consequences:** Risk profiles help us to decide whether to grant you a requested transaction. They also help us to assess whether we should increase or reduce the amount granted in your current transactions.

When you order one of these products or services using electronic channels, this profiling involves taking automated decisions in order to grant the product transaction you are requesting or not.

- **Logic:** The information indicated in the "Type of data processed" section above will be used.

Based on this information, a specific value is assigned to each piece of data. The sum of these values will produce a score indicating the probability of a default.

The importance of each variable and its influence on the final result is calculated in advance using mathematical models and is included in our risk policies.

Other relevant information:

- **Automated decisions:** We will use automated processing to analyse your repayment ability for applications submitted through electronic channels to check whether we can grant the financing you are requesting or not.

If the above calculation means that we do not grant you the financing, you will not be able to contract the requested product through this channel. In any case, you may request that a human reviews this decision.

You can contact Facilitea directly through the channels set out in this policy and you may resubmit a financing application at any CaixaBank branch where the analysis does not include automated decisions.

- **Regulatory obligations:** This processing is required to manage our contractual relationship. It is also required in order to comply with regulations, the 10/2014 Act of 26th June on the regulation, supervision and solvency of credit institutions.
- **Credit information system enquiries:** We will carry out the credit information systems enquiries required to analyse your repayment ability. We will carry out these enquiries based on our legitimate interest as set out in section 6.5.C.
- **CIRBE enquiry and communication:** The CIRBE enquiries required for the analysis of your repayment ability are carried out in accordance with the provisions of the 44/2002 Act of 22nd November, on financial system reform measures. Furthermore, the data necessary to identify the persons with whom credit risks are maintained will be communicated, based on the same legislation.
- **Preparation of management reports and mathematical models:** We will use data resulting from this processing for the preparation of management reports and mathematical models, in accordance with section 6.5.B) of this policy.

Joint data controllers: Applicable regulations oblige us to analyse your repayment ability jointly with the companies that comprise our consolidated group of credit institutions.

The following CaixaBank Group companies will process your data jointly.

- CaixaBank, S.A.
- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- Nuevo Micro Bank, S.A.U.
- CaixaBank Equipment Finance, S.A.U.
- Unión de Crédito para la Financiación Mobiliaria e Inmobiliaria, CREDIFIMO, E.F.C., S.A.U.
- Banco BPI, S.A.
- Facilitea Selectplace, S.A. Sociedad Unipersonal
- CaixaBank Wealth Management Luxembourg

You can find the essential elements of the joint data controller agreements at: www.caixabank.es/empresasgrupo.

C. Management of non-payments and defaults

Purpose: To establish measures to resolve non-payments that may arise in instalment payment transactions or the repayment of advanced money.

These measure can include, among others:

- Early debt management.
- Disclosure of your data to external agencies for recovery of the debt.

- Disclosure of your data to credit information systems (solvency databases).
- The filing and monitoring of claims.
- The identification and monitoring of insolvency proceedings.
- The review and valuation of debt refinancing measures or cases covered by the Code of Best Practices.
- Portfolio sales.
- In-person visits.

Type of data processed:

- Identification and contact data
- Data on your professional or employment and socio-economic activity
- Sensitive data related to situations of vulnerability
- Data on legal capacity
- Data on particular communication needs
- Contract data
- Basic financial data
- Third-party data from statements and receipts of current accounts and payment accounts
- Data on communications maintained with you
- Data obtained from the execution of statistical models
- Credit information system data
- Equifax RISK SCORE data
- CIRBE data
- Data held by the General Social Security Treasury
- Information obtained from sources accessible to the public, and public records

Use of profiling: we will create an economic or solvency profile, which we will use exclusively to establish specific and suitable measures to recover the debt.

- Purpose of the profile: To determine the most suitable measures for recovery of the debt by Facilitea. It is also used to forecast the debt recovery of each customer.
- Consequences: the profiles are tools used to support decisions related to actions or measures to recover debt. They help us determine the most suitable measures for each customer.
- Logic: The profiling will use the information set out in the previous section. Based on this information, a specific value is attributed to each piece of your data, the sum of which will give a score relating to the probability of recovery of the debt and, based on this, the most suitable measures to recover it.

Other relevant information:

- **Disclosure to credit information systems:** This processing may entail the disclosure to credit information systems of the data on the debt or non-payment situation. This will be done based on our legitimate interest in accordance with the details set out in section 6.5.D.

- **Obtaining contact data:** It may be necessary for external debt recovery agencies to collect additional contact data about you in order to recover the debt. This will be done based on our legitimate interest.
- **Preparation of management reports and mathematical models:** The processed data and data resulting from this processing will also be used for the preparation of management reports and mathematical models. This will be done in accordance with the content of section 6.4.B).

Joint data controllers: Applicable regulations oblige us to carry out the credit and liquidity risk management jointly with all the companies that comprise our consolidated group.

Therefore, the following CaixaBank Group companies will jointly process your data:

- CaixaBank, S.A.
- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- Nuevo Micro Bank, S.A.U.
- CaixaBank Equipment Finance, S.A.U.
- Unión de Crédito para la Financiación Mobiliaria e Inmobiliaria, CREDIFIMO, E.F.C., S.A.U.
- Banco BPI, S.A.
- Facilitea Selectplace, S.A. Sociedad Unipersonal.
- CaixaBank Wealth Management Luxembourg

You can find the essential elements of the joint data controller agreements at: www.caixabank.es/empresasgrupo.

9.2 Processing required to comply with regulatory obligations

We will carry out this processing with regard to all Facilitea customers (Identified Facilitea Customers and Facilitea User Customers) and it is necessary in order to comply with a legal obligation that applies to us, as set out in art. 6.1.c) of the General Data Protection Regulation (GDPR).

We need to process your data so that you can take out and maintain your contracts with us. If you object to this processing, we will have to end these relationships, or you will not be able to take out contracts if you have not done so already.

The types of processing required to establish contractual relationships are listed below, from (A) to (B). For each item, we will indicate: the purpose, the details of the processed data, information on the use of profiling, if applicable, other relevant processing information whether or not the processing is carried out jointly with other CaixaBank Group companies.

A. Processing to comply with tax legislation

Purpose: To adopt the measures imposed on our activity by tax legislation.

Therefore, Facilitea will process your data in order to:

- Collect information and documentation regarding your tax situation as required by tax laws.
- Report details relating to your tax situation to government agencies when required by law or by a competent authority.

Data processed:

- Identification and contact details: full name, gender, postal, telephone and email contact information, address of residence, nationality and date of birth, communication language, identification document.
- Contract details: contracted or ordered products and services.

Data controller: The data controller of this processing is Facilitea.

B. Processing for handling complaints and claims

Purpose: To handle queries, complaints and claims submitted to Facilitea in accordance with applicable legislation.

Protection of personal data legislation also requires us to handle any complaints you make to our Data Protection Officer and manage the exercise of data protection rights regarding your personal data.

Therefore, Facilitea will process your data in order to:

- Receive your complaints and claims through the Customer Service Department
- Respond within the established time period.
- Manage the exercise of data protection rights regarding your personal data and queries submitted to the CaixaBank Group's Data Protection Officer.

Data processed:

- Identification and contact details: full name, gender, postal, telephone and email contact information, address of residence, nationality and date of birth, communication language, identification document.
- Contract details: contracted or ordered products and services.
- Basic financial information: payment history of contracted products and services.

Data controller: The data controller of this processing is Facilitea.

9.3 Processing based on the legitimate interest of Facilitea

We will carry out this processing with regard to all Facilitea customers (Identified Facilitea Customers and Facilitea User Customers) and the processing is for the fulfilment of the legitimate interests of Facilitea or of a third party, provided that our interests do not take precedence over your interests or your fundamental rights and freedoms, in accordance with art. 6.1.f) of the General Data Protection Regulation (GDPR).

Before carrying out this processing, we will consider the balance between your rights and our legitimate interest. We will only carry out the processing in cases where our interest prevails over your rights and freedoms. You can ask about the analysis that is done to consider the legitimate interest of a processing operation at any time by emailing your enquiry to delegado.proteccion.datos@caixabank.com

Please remember that you can object to processing carried out due to legitimate interest. If you believe that Facilitea should consider a personal situation or reason to cease processing your data, you may make request this simply and free of charge through the channels mentioned in section 4.

The types of processing are listed below, from (A) to (D). For each item, we will indicate: the legitimate interest of Facilitea, a description of the purpose, the type of data processed if applicable, information on the use of profiling, other relevant processing information and whether or not the processing is carried out jointly with other CaixaBank Group companies.

A. Fraud prevention

Legitimate Interest: To prevent fraud that could lead to financial or reputational damage to Facilitea its customers.

Purpose: To adopt the necessary measures to prevent malicious transactions or conduct before they occur. The purpose is also to mitigate their impact if they do arise by identifying suspicious transactions or conduct involving attempts to commit fraud against Facilitea or its customers.

We will process your data in order to:

- Check the identity of customers, to prevent fraudulent access to information or transactions.
- Review and analyse the contracts and transactions carried out in our systems to protect our customers from fraud through any channel and avoid cyber attacks.

Data processed: The data we will process for this purpose are:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, nationality, date of birth, communication language, identification document.
- **Contract data:** contracted or ordered products and services.
- **Basic financial data:** payment history of contracted products and services.
- **Our browsing data:** data obtained from your browsing of our websites or, if applicable, applications and your browsing history on these websites: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address, if you have accepted the use of cookies and similar technologies on your browsing devices.
- **Browsing data:** data obtained from your browsing of third-party websites or applications and your browsing history on these websites: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address, if you have accepted the use of cookies and similar technologies on your browsing devices.

Use of profiling: we will create a profile of your usual transactions and activities. We will use this profile exclusively to identify unusual situations that could indicate an attempt to commit fraud.

- **Purpose of the profile:** The purpose of the profile used is to identify interactions that are unusual or do not match your behaviour profile. These could be attempts to commit fraud or gain fraudulent access to information.
- **Consequences:** Profiles help us to identify fraudulent transactions. Their use requires the implementation of measures, including reviewing transactions in detail, and blocking or disabling transactions.

Other relevant information:

- **Automated decisions:** For fraud prevention, we will use processing including automated decisions. This enables us to detect possible fraudulent transactions.

In the case of transactions that cannot be cancelled once executed, such as instant payments or transfers, the automated decision may block you from carrying out the transaction if it detects that it might be fraudulent. Therefore, you will not be able to carry out the transaction. You may request to carry out the transaction again at any of our branches where the analysis does not include automated decisions.

- **Right of objection:** If you believe that Facilitea should cease using your data due to a personal reason, you can request this simply and free of charge through the channels indicated in section 4.

Data controller: The data controller of this processing is Facilitea.

B. Preparation of mathematical models

Legitimate interest: To organise and improve our business activity as efficiently as possible. To achieve this, we need to create mathematical algorithms that will help us in the advanced analysis of information.

Purpose: To create and maintain algorithms and statistical and mathematical models. Using them, we can carry out complex calculations and analysis that enable us to apply the described processing.

Data processed: The data we will use are data that have been identified previously for each processing type. We will apply, whenever possible, techniques so that the data cannot be associated with a person (anonymisation or pseudonymisation). We can therefore guarantee that they do not affect the rights of data subjects and that the result will be mathematical or algorithmic formulas.

Other important information:

- **Right of objection:** If you believe that Facilitea should cease using your data due to a personal reason, you can request this simply and free of charge through the channels indicated in section 4.
- **Ancillary data processing:** The purpose is not to process individual customer data. This is a necessary but secondary type of processing to create mathematical formulas. Therefore, anonymisation techniques are used and information is minimised. This processing does not have individual consequences for customers.

Data controller: When management reports are based on processing in this policy by Facilitea, the data controller will be Facilitea.

If the processing is carried out jointly, it will be performed under the same system as the original processing. You can find the list of the joint controller companies and the processing agreements at: www.caixabank.es/empresasgrupo.

C. Preparation of management reports

Legitimate interest: To organise and improve our business activity as efficiently as possible. To do this, we need to have reports on the management of the company and on the market.

Purpose: To prepare reports on the company's activity and its relationship with the market, on the composition and development of its customer base and on the effectiveness of its products and services. These reports help us with our internal analysis processes, planning and decision making. They are not used to make commercial offerings to our customers.

Data processed: The data identified in each processing type will be used. We will apply, whenever possible, techniques so that the data cannot be associated with a person (anonymisation or pseudonymisation). These reports contain statistical or aggregated data, except when required to maintain traceability for correct internal management.

Other important information:

- **Right of objection:** If you believe that Facilitea should cease using your data due to a personal reason, you can request this simply and free of charge through the channels indicated in section 4.
- **Ancillary data processing:** The purpose is not to process individual customer data. This is a necessary but secondary type of processing to create aggregated reports.

Therefore, anonymisation techniques are used and information is minimised. This processing does not have individual consequences for customers.

Data controller: When reports are based on processing carried out by Facilitea, the data controller will be Facilitea. If the processing is carried out jointly, it will be performed under the same system as the original processing. You can find the list of the joint controller companies and the processing agreements at: www.caixabank.es/empresasgrupo

D. Consulting credit information systems as part of the application for and subsequent management of products that involve deferred payment by instalments.

Legitimate interest of Facilitea: To avoid non-payment and defaults by applicants or contract holders of products or services that involve deferred payment by instalments.

Purpose:

- To ascertain if the applicants for or contract holders of products or services that involve deferred payment by instalments can pay the agreed instalments.
- To determine if the contract holders of products or services that involve repaying money that we have advanced can repay it.
- To track and manage current transactions.
- To prevent and manage defaults.

We will process your data in order to:

- Check your information: Prior to approving the transactions involving deferred payment by instalments and after in order to monitor and manage the risk, we will consult the following asset solvency and credit agencies: (i) Asnef database, (ii) Badexcug database.

Data processed:

- **Identification and contact data:** full name, gender, postal, telephone and email contact information, address of residence, nationality, date of birth, communication language, identification document.
- **Contract data:** contracted or ordered products and services.
- **Basic financial data:** payment history of contracted products and services.
- **Data in credit information systems:** obtained by consulting the Asnef and Badexcug credit reporting databases, which provide information on debts, financial solvency and credit (debtor, creditor and debt).

Other relevant information:

- **Right of objection:** If you believe that Facilitea should cease using your data due to a personal reason, you can request this simply and free of charge through the channels indicated in section 4.

Data controller: Facilitea acts as the data controller regarding credit information system enquiries. The contact details for these databases are provided below:

- Asnef database: Asnef Equifax Servicios de Información sobre Solvencia y Crédito. Apartado de correos 10546, 28080 Madrid (sac@equifax.es)
- Badexcug database: Apartado de correos 1188, 28108 Alcobendas (badexcug@experian.com)

10. Recipients of the data

Data controller and joint data controllers

The data we process in your capacity as a Facilitea customer is processed by Facilitea. If data is processed by joint data controllers, it will be processed by CaixaBank Group companies in accordance with the provisions of the above sections on processing.

Authorities and official bodies

We could be required to provide information on the transactions we carry out to the authorities or official bodies of other countries. These could be countries located both inside and outside the European Union.

Disclosure of data to outsourced service providers

We sometimes use service providers with potential access to personal data.

These providers have adequate data processing safeguards. They are carefully chosen by Facilitea. They must also fulfil specific requirements if the service involves processing data.

In addition, Facilitea has mechanisms in place to ensure that providers guarantee compliance with data protection. They must also comply with the corporate principles of Facilitea approved by the Privacy Committee of CaixaBank CPC and by the sole director of Facilitea as mentioned in section 1 of this policy.

The type of services we can assign to service providers is:

- > Back-office financial services
- > Administrative support services
- > Auditing and consulting services
- > Legal services and asset and non-payment recovery services
- > Payment services
- > Marketing and advertising services
- > Survey services
- > Call centre services
- > Logistics services
- > Physical security services
- > IT services (system and information security, cyber security, information systems, architecture, hosting, data processing)
- > Telecommunications services (voice and data)
- > Printing, enveloping, postal and courier services
- > Data retention and destruction services (digital and physical)

11. Data retention periods

Retention to maintain contractual relationships

We will use your data as long as the contractual relations we have established remain in force.

Retention of authorisations for processing based on consent or legitimate interest

We will process the data based on your consent until you revoke said consent. If you cancel all your product and service contracts with CaixaBank Group companies but do not revoke the consent you gave us in the past, we will automatically void said consent from when you cease to be a customer.

We will process data based on our legitimate interest. If you do not agree, you can object to the processing and we will cease processing when your objection is accepted.

Retention to comply with legal obligations and to make, enforce and defend claims

Once your contractual relationship with us has ended, we will only keep your data to comply with legal obligations. We will also keep your data in order to manage claims during the limitation period for actions that you can take.

We will apply technical and organisational measures to the data to guarantee that they are only used for these purposes.

Data destruction

We will destroy your data when the limitation periods for actions arising from the contractual relationships between us have elapsed.

12. Data transfers outside the European Economic Area

At Facilitea we process your data and contract service providers within the European Economic Area or in countries with an adequate level of personal data protection.

If we need service providers that process data outside of the aforementioned cases, we will ensure that it is done securely and legally.

To do this, we require that they have suitable safeguards in accordance with data protection regulations. That is, that they have binding corporate standards that guarantee the same protection as in the European Economic Area or use European Union standard clauses. You can request a copy of these safeguards at: www.caixabank.com/delegadoprotecciondedatos.

13. Automated decisions

Automated decisions are based solely on the automated processing of your data (without the participation of a person) and could have legal effects for you or could significantly affect you.

In section 6 of this Policy we inform you about the type of processing that includes automated decisions.

In addition, if during our contractual relationships we use automated decisions (e.g., we reject your request to contract a certain product), we will inform you about this in the contractual documentation of the product or service you have requested, and the rationale behind the decision.

At that time, we will also give you the right to request human intervention, to express your point of view and to challenge the decision.

14. Revision

We will revise this Privacy Policy whenever it is necessary to keep you duly informed. When new standards or criteria are published or if we engage in new types of processing, for example.

We will notify you through the usual communication channels whenever there are substantial or significant changes to this privacy policy.

Last updated 28th May 2026