



Informative circular on the LOPDGDD processing

Who is the controller of the personal data?

BILBAO-RIA 2000, S.A. is the Controller of the Data Subject's personal data and informs him/her that these data shall be processed in accordance with the provisions of Regulation (EU) 2016/679 of 27 April (GDPR) and the Organic Law 3/2018 of 5 December (LOPDGDD), providing the following information on the processing:

Purposes of the processing, for what purpose do we process your personal data?

For the proper management of our internal information system, processing the corresponding irregularities reported through it and deciding on the appropriateness of initiating an investigation, in order to detect possible offences and prevent the imposition of any type of liability to BILBAO-RIA 2000, S.A., as well as to avoid any type of conduct contrary to the internal or external regulations of the entity.

Legitimation of the processing, why can we process your personal data?

Based on the legal obligation established in articles 10 and 13 of Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, to have these internal information systems (article 6.1.c GDPR).

Your identity will be kept confidential:

Pursuant to Article 31.1 of Law 2/2023, we inform you that your identity will in any case be kept confidential and will not be communicated to the persons to whom the facts related or to third parties.

Data retention criteria, for how long will we keep your personal data?

We will retain your data for a maximum period of three months after notification of the irregularity if the facts have not been proven and provided that they are not necessary for other purposes or as evidence of proper control and supervision in the prevention of criminal offences. In the event that the facts are proven or with sufficient evidence, the data will be kept for as long as it is necessary for the entity to exercise its rights before the courts of justice, and when they are no longer necessary for this purpose, they will be deleted with appropriate security measures to ensure the anonymisation of the data or their total destruction.



Communication of data, to whom do we provide your personal data?

Unless required by law, your data will only be disclosed to the following categories of recipients:

- Courts and Tribunals, as well as other possible conflict resolution bodies.
- State Security Forces and Corps.
- Notaries and registrars.

We have signed with suppliers who need access to your personal data for the provision of the services we have contracted with them or who, due to the operation of our electronic services (website and e-mails) may have access to certain personal data the necessary confidentiality and personal data processing contracts required by law to protect your privacy (article 28.3 GDPR).

Related rights, ¿what are your rights according to the GDPR?

- Right of access, rectification, portability and erasure of your data and the limitation or objection to their processing.
- Right to file a claim with the Spanish Supervisory Authority (www.aepd.es) if you consider that the processing does not comply with current legislation.

Contact information to exercise their rights: BILBAO-RIA 2000, S.A.. Jose M^a Olabarri, 4 Planta E - 48001 Bilbao