

Personal data protection policy for representatives and contact persons

Who is the controller of your personal data?

BBVA ASSET MANAGEMENT, S.A., S.G.I.I.C., with registered office at Calle Azul, nº 4, 28050, Madrid, Spain. (“BBVA AM”)

BBVA PENSIONES, S.A., E.G.F.P. with registered office at Calle Azul, nº 4, Madrid, Spain. (“BBVA PENSIONES”)

GESTIÓN DE PREVISIÓN Y PENSIONES, E.G.F.P., S.A., with registered office at Calle Azul, nº 4, Madrid, Spain. (“GPP”)

COLEGIOS DE INGENIEROS DEL PAÍS VASCO, EPSV ASOCIADA, with registered office at Calle Alameda de Mazarredo, nº 69, Bilbao Spain.

NORPENSIÓN, EPSV INDIVIDUAL, with registered office at Calle Gran via nº 12, Bilbao, Spain.

NORPYME, EPSV DE EMPLEO with registered office Calle Gran via nº 12, Bilbao, Spain.

TUBOS REUNIDOS, EPSV DE EMPLEO, with registered office at Bº Sagarribai S/N – Amurrio Spain.

GRUPO DE EMPRESAS TUBACEX, EPSV DE EMPLEO, with registered office at Calle Tres Cruces nº 9, Lloido. Spain.

The controller of your personal data will be the entity that processes it as a result of a contract in which you are named as a representative or contact.

Who the BBVA Group's Data Protection Officer is and how to contact the DPO

The Data Protection Officer is the person in charge of protecting the fundamental right to personal data protection and is responsible for compliance with data protection regulations.

In connection with the processing activities performed by the below companies (“Management Companies”):

BBVA AM

BBVA PENSIONES

GPP

You will be able to contact the BBVA Group Data Protection Officer at the following email address:
dpogrupobbva@bbva.com

What do we use your personal data for?

We process the personal data (identification, contact and signature data, as well as those that may appear in the documentation accrediting their representation) of the signatories acting as Representatives in contracts, and the personal data (identification and contact details) of the persons indicated in the contracts as contact persons for notification purposes, or of any other persons who may be specified at a later date, for the purpose of managing the maintenance, compliance, development, control and execution of the provisions of a contract with the Entity.

The Entity will also process the personal data of the Representatives to prevent money laundering and the financing of terrorism in order to comply with information collection and identification obligations, as well as obligations with respect to supplying information about payments to authorities in other countries both inside and outside the European Union on the basis of the legislation in effect in certain countries and agreements executed with the same.

Why do we use your personal data?

The legal basis that allows us to process your personal data to manage the maintenance, compliance, development and control and the execution of a contract is our legitimate interest. In the case of complying with the obligations on money laundering and the funding of terrorism, the legal basis is compliance with a legal requirement.

How long with the Entity retain your data?

The Entity will retain your personal data during the term of the contractual relationship. Once the contract ends, the Entity shall retain blocked versions of your personal data during the statutory limitation period (usually ten years) prescribed by regulations on money laundering and funding of terrorism, as well as of the personal data of Representatives and contact persons for the statutory limitation periods for the sole purpose of handling claims or legal remedies. Once said statutory limitation periods expire, the personal data will be destroyed.

Who will we disclose your data to?

We will only transfer your personal data to third parties if we are obliged to do so by law, or if you have previously agreed such action with the Entity.

What are your rights when you submit data to us?

RIGHT	CONTENT	SERVICE CHANNELS
Access	You will be able to consult your personal data contained in the Bank's files.	derechosarso-proveedores.es@bbva.com
Rectification	You can amend your personal data if it is inaccurate	
Erasure	You can request that your personal data be deleted	
Objection	You can request that your personal data not be processed	
Processing limitation	<p>You can request that processing of your data be restricted under the following circumstances: While challenges as to the accuracy of your data are being checked.</p> <p>When the processing of your data is unlawful, but you object to it being erased. If BBVA AM does not need to process your data, but you need it in order to file or defend claims.</p> <p>If you have objected to your data being processed in order to comply with an undertaking in the public interest or to fulfill a legitimate interest, while it is considered if the legal grounds for processing the data prevail over the ones you cite.</p>	

Portability	You may receive the personal data you have provided in electronic format and transfer it to another entity	

If you think the Management Companies, as data controllers, have failed to process your personal data in accordance with the applicable regulations, you can contact the BBVA Group Data Protection Officer at dpogrupobbva@bbva.com.

You can also submit a claim to the Spanish Data Protection Agency (www.agpd.es)

Exercising these rights is free.