

1. Why is the Privacy Policy necessary?

The General Data Protection Regulation¹ is a rule of direct application throughout the European Union since May 25, 2018 and it requires, by virtue of the principle of transparency, that the interested parties know the circumstances and conditions of the processing of their personal data.

The Privacy Policy is the document that is made available to users in order to comply with the principle of transparency.

2. Who is responsible for the processing of your data?

Those responsible for the processing of your data ("") are the following entities:

- Association of Collective Investment Institutions and Pension Funds ("**joint controllersINVERCO**"), entity with NIF G-28888824 and address at C / Príncipe de Vergara nº 43 , Madrid Spain. You can obtain additional information at the following address: inverco@inverco.es.
- Spanish Union of Insurance and Reinsurance Entities ("**UNESPA**"), entity with NIF G-28532919 and domiciled at C / Núñez de Balboa, 101, Madrid, Spain. You can obtain additional information at the following address: DPO@unespa.es.
- Spanish Banking Association ("**AEB**"), with NIF G-28515153 and address at Torre Espacio, Paseo de la Castellana, 259 D, planta 30, 28046 Madrid, Spain. You can obtain additional information at the following address: aeb@aebanca.es.
- **CECA**, entity with NIF G-28206936 and address at C / Alcalá, 27, Madrid, Spain. You can obtain additional information at the following address: arco@cecabank.es.
- Unión Nacional de Cooperativas de Crédito ("**UNACC**") entity with NIF number F-28900488 and registered office at C / Alcalá, 55, Madrid, Spain. You can obtain additional information at the following address: unacc@unacc.es.

Jointly and hereinafter "the Entities".

3. How have we obtained your data?

The data have been obtained through the completion by users of the form offered on the website itself.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data and the free circulation of these data and by which Directive 95/46 / CE is repealed.

4. For what purpose do we process your personal data?

The purpose of data collection is to send the *newsletter* and, where appropriate, communications related to events and activities related to the purpose of each of the Entities.

Exclusively automated decisions will not be executed with the personal data obtained.

5. What is the legitimacy for the processing of your data?

The legal basis that justifies the processing of personal data is the consent of the interested parties.

6. How long will we keep your data?

The personal data provided will be kept and processed to the extent necessary to use them according to the purpose for which they were collected and in accordance with the legal basis of the treatment, in the terms indicated in the current data protection regulations.

Your personal data may be kept as long as you do not exercise your right to erasure.

7. Do we transfer your data to third parties?

The data will not be transferred to third parties, except to those entities necessary for the execution of the aforementioned purposes, as those in charge of the treatment. In any case, the corresponding agreements will be formalized to guarantee compliance with current data protection regulations.

No international data transfers will be made.

8. What are your rights?

The interested party may exercise the following rights in relation to the processing of their data, free of charge:

- Right to request access to their personal data.
- Right to request rectification or deletion when, among other reasons, the data is no longer necessary for the execution of the contract.
- Right to request the limitation of your treatment, in which case we will only keep them for the exercise or defense of claims or if some type of judicial, legal or contractual responsibility could arise from their treatment.
- Right to oppose the treatment, in which case the data will be stopped, except for legitimate, compelling reasons, or the exercise or defense of possible claims, and we will keep them duly blocked during the corresponding period while the legal obligations persist.
- Right to data portability. Interested persons can request and receive the data that concern them and / or that they have provided us or request that we send them to another data controller of their choice, in a structured format of common use and mechanical reading.

PRIVACY POLICY



- Right to withdraw the consent given, at any time, without affecting the legality of the treatment based on the consent prior to its withdrawal.

To exercise their rights, the interested party may send the form that is attached as an annex ("EXERCISE OF RIGHTS"), accompanying a photocopy of the DNI or equivalent document, indicating the right that is being exercised, by going to the following address:

- Email: info@finresp.es, indicating in the subject "Data Protection"
- Postal address: Afi (Legal Area)
C / Marqués de Villamejor, 5
28006 Madrid - Spain

Your requests will be answered as soon as possible and, in any case, at within one month from the receipt of your request. This period may be extended for another two months if necessary, taking into account the complexity and number of requests. Afi will inform the interested party of the extension within the first month from the request.

If the interested party has not obtained satisfaction in the exercise of their rights, they may file a claim with the competent Data Protection Control Authority, without prejudice to the legal actions they consider. For these purposes, the contact details of the **Spanish Agency for Data Protection** are as follows:

- Electronic office: <https://sedeagpd.gob.es/sede-electronica-web/>
- Postal address: Spanish Agency for Data Protection
C / Jorge Juan, 6
28001 Madrid - Spain
- General information: <http://www.agpd.es/>

9. Do we adopt security measures?

Yes, organizational and technical security measures are adopted so that the processing of personal data carried out is in accordance with the requirements of current legislation on national and European data protection.

10. Can the Privacy Policy be modified?

Yes, both Afi and the Entities reserve the right to modify their Privacy Policy, complying with the applicable legislation at all times. Any modification of this Policy will be published on the website, so we suggest that you consult its terms with relative frequency.

Last update: January 22, 2020.

ANNEX

MODEL I

EXERCISE OF RIGHTS BY THE INTERESTED

PARTY Afi - Legal Area
C / Marqués de Villamejor, 5
28006 Madrid - Spain

Mr./Mrs., of legal age, with ID or equivalent document ... , of which a copy is attached , hereby

REQUESTS

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....., in accordance with General Regulation of Data Protection.

I also request to receive a response to this request through the following form (*fill in at least one*):

- By postal mail
- By email

In to of of 20

Signed:

INTERESTED PARTY

MODEL II

EXERCISE OF RIGHTS THROUGH A REPRESENTATIVE

Afi - Legal Area
C / Marqués de Villamejor, 5
28006 Madrid - Spain

Mr./Mrs., of legal age, with ID or equivalent document ... , on behalf of and on behalf of Mr./D^a.
....., with DNI or equivalent document...
....., by means of this document

REQUEST

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....., in accordance with the provisions of the Data Protection regulations.

I also request to receive a response to this request through the following form (*fill in at least one*):

- By postal mail
- By email

DNI or equivalent document of the interested party and of the representative, as well as the document certifying said representation.

In on of of 20

Signed:

REPRESENTATIVE