

DATA PROTECTION POLICY

BASIC INFORMATION

Responsible	Name: Aresbank, S.A. VAT NO: A28386191 Address: Paseo de la Castellana 257, 28046, Madrid, Spain.
Purposes	Carrying out the relevant procedures for the appropriate management and resolution of reports of facts or omissions that fall within the scope of Law 2/2023, of 20 February, regulating the protection of persons who report Regulatory violations and the fight against corruption.
Legitimacy	In the event that the communication concerns the commission of acts or omissions that fall within the scope of Law 2/2023 of 20 February on the protection of persons who report regulatory violations and the fight against corruption, the legal basis is the fulfilment of a legal obligation.
Addressees	The personal data collected in the complaints channel may be communicated to the relevant Public Authorities, preserving the data privacy.
Rights	The data subject may exercise, at any time, the rights of opposition, access, portability, rectification, limitation and deletion of data. In any case, the rights of access and opposition shall be subject to the limitations established by the Law 2/2023, of 20 February, regulating the protection of persons who report regulatory violations and the fight against corruption.
Conservation	The provided personal data shall be kept for the time necessary for the management and resolution of the received communication. Thereafter, it will be stored, in general, for a period of three months, although it may be extended for an additional three months in cases of particular complexity.

ADDITIONAL INFORMATION

In compliance with current legislation, Aresbank has implemented the appropriate technical and organizational measures to guarantee an adequate level of security, as well as to prevent the loss, misuse, alteration, unauthorized access and theft of the data provided by the interested party.

Moreover, Aresbank has established the necessary measures to preserve the identity and guarantee the confidentiality of the data corresponding to the persons concerned and to any third party mentioned in the provided information, especially the identity of the

informant in the event that he/she has been identified.

1. Data controller.

The details of the data controller are provided below:

Name: Aresbank, S.A.

VAT ID: A-28386191

Address: Paseo de la Castellana 257, 28046, Madrid, Spain

E-mail: aresbank@aresbank.es

2. Data protection officer.

The Data Protection Officer is the figure in charge of enforcing compliance with the GDPR in order to guarantee the protection of the personal data provided by the data subject through the Whistleblower Channel.

To contact the Data Protection Delegate, the interested party may send a communication to the following e-mail address: dpd.aresbank@aresbank.es

3. Purpose and legitimacy for the processing of personal data.

The purpose of the processing of personal data is to carry out the relevant procedures for the proper management and resolution of reports of facts or omissions that fall within the scope of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory violations, infringements and the fight against corruption.

The legal basis on which we are entitled to process your data is as follows:

- Article 6(1)(c) of the GDPR: in the event that the communication concerns the commission of acts or omissions that fall within the scope of Law 2/2023 of 20 February on the protection of persons who report regulatory infringements and the fight against corruption, the legal basis is the fulfilment of a legal obligation.
- Article 6(1)(f) of the GDPR: in case the communication concerns a breach of Aresbank's code of conduct or other internal policy, the legal basis shall be Aresbank's legitimate interest in enforcing its internal rules.

4. Categories of data processed

The data to be processed will be the following:

- With regard to the persons to whom the communication refers, their names, forenames and position.
- With regard to the informant, in case the communication is not anonymous: name, surname, position and any contact details

you wish to provide (e-mail, telephone, etc.)

- The facts or omissions which are the subject of the reported communications.
- Information included in the provided documentation to investigate the reported conduct.

Data will never be processed if not necessary for the knowledge and investigation of the actions or omissions reported, proceeding, if they are not essential, to their immediate deletion.

Likewise, any personal data that may have been communicated and that refer to conduct that does not fall within the scope of Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, will be deleted.

If the information received contains personal data included in the special categories of data, it shall be deleted immediately, without registration or processing.

In the event that for the processing of specific information personal irrelevant data are obtained or, if they are collected accidentally, they shall be deleted without undue delay.

If it is demonstrated that the information provided or part of it is not truthful, it will be immediately deleted as soon as this circumstance comes to light, unless this lack of truthfulness could constitute a criminal offence, in which case the information will be kept for the necessary time during the legal proceedings.

5. Data retention time.

The provided personal data will be kept for the time necessary for the management and resolution of the received communication. This period, in general, will have a maximum period of three months, although it may be extended for an additional three months in cases of particular complexity.

In any case, if three months have elapsed since receipt of the communication and no investigation has been initiated, the communication shall be deleted, unless the purpose of the retention is to leave evidence of the performance of the system.

Communications that have not been acted upon will only be retained in anonymized form. Likewise, an anonymized record will be kept of communications that have been acted upon once the investigation has been completed.

6. Communication of data to third parties.

The identity of the informant shall in any case remain confidential and

shall not be disclosed to the persons to whom the communications refer to or to third parties.

The identity of the informant may only be communicated to the judicial authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal or disciplinary investigation. In such cases, the informant shall be informed before his or her identity is revealed, unless such information could compromise the investigation or the judicial proceedings.

7. Your rights.

The interested party may exercise, if desired and at any time, the rights of access, rectification and deletion of data, as well as request to limit the processing of his/her personal data, oppose to it, request the portability of his/her personal data, as well as not to be subject to automated individual decisions, by sending a written communication to the following address derechoslopd@aresbank.es or Paseo de la Castellana 257, 28046, Madrid, Spain, providing in all cases the ID card or official document accrediting the identity of the interested party.

The person to whom the facts are referred may in no case have access to the identity of the informant.

In the event that the person to whom the facts reported in a communication exercises his or her right to object, it will be presumed that, unless proven otherwise, there are compelling legitimate reasons that legitimize the processing of his or her personal data.

Without prejudice to any other administrative remedy or legal action, the data subject may in any case file a complaint with the Spanish Data Protection Agency, especially when he/she has not obtained satisfaction in the exercise of his/her rights, through the website www.agpd.es.