

## **CAIXABANK ASSET MANAGEMENT, S.A.U. PRIVACY POLICY**

**23 July 2024**

### **CONTENTS**

1. [How we process your personal data](#)
2. [Who processes your data](#)
3. [Data Protection Officer](#)
4. [Exercise of rights and filing of claims before the Spanish Data Protection Agency \(AEPD\)](#)
5. [Data processed](#)
6. [How we process your data](#)
  - 6.1. [Processing necessary for fulfilment of contractual relationships](#)
  - 6.2. [Processing necessary to comply with regulatory obligations](#)
  - 6.3. [Processing based on the legitimate interest of CaixaBank AM](#)
7. [Data recipients](#)
8. [Data retention periods](#)
9. [Data transfers outside the European Economic Area](#)
10. [Automated decisions](#)
11. [Review](#)

## 1. How we process your personal data

In order to manage your relationship with us, CaixaBank AM will process your personal data for different purposes, always in accordance with current legislation, respecting your rights and with total transparency.

To this end, this **Privacy Policy**, which can be accessed at any time from the "**Privacy**" section at [www.caixabankassetmanagement.com](http://www.caixabankassetmanagement.com), provides comprehensive details of **how we will use your data as part of the relationships we establish with you**.

The main regulations governing our processing of your personal data are as follows:

- > **Regulation (EU) 2016/679** of the European Parliament and of the Council of 27 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, "**GDPR**").
- > **Organic Law 3/2018**, of 5 December, on the Protection of Personal Data and the guarantee of digital rights (hereinafter, "**LOPD**").

## 2. Who processes your data

**Data controller:** The data controller responsible for processing your personal data in your contractual and business relationships with us ("**Contractual Relationships**") is **CaixaBank Asset Management SGIIC S.A.U.** ("**CaixaBank AM**"), with Tax Identification Number A-08818965 and registered office at Paseo de la Castellana, 189, 5th floor, Madrid.

**Joint controllers of processing:** In addition, for certain processing activities of which you will be informed in detail in this policy, CaixaBank AM and **CaixaBank Group companies** will jointly process your data, jointly determining the purposes ("**what the data is used for**") and the means used ("**how the data is used**"). Thus, they are jointly responsible for these processing activities.

The processing activities that CaixaBank AM and the CaixaBank Group companies will perform on a joint basis involving your data are described in detail in section 6 "How we process your data".

You can find a list of the companies that process your data, and the basic aspects of the joint responsibility for processing agreements, at: [www.caixabank.es/empresasgrupo](http://www.caixabank.es/empresasgrupo).

## 3. Data Protection Officer

CaixaBank AM and the CaixaBank Group companies have appointed a **Data Protection Officer**, who is available to answer your questions on the processing of your personal data and the exercise of your rights.

You can contact the Data Protection Officer with your suggestions, queries, doubts and complaints at: [www.caixabank.com/delegadoprotecciondedatos](http://www.caixabank.com/delegadoprotecciondedatos)

## 4. Exercise of rights and filing of claims before the Spanish Data Protection Agency (AEPD)

**You can exercise your rights** of **access, rectification, opposition, erasure, limitation and portability** of your personal data, and to **withdraw your consent** and **not be subject to automated decision-making**, in accordance with the law in force.

You may request to exercise these rights through any of the following channels:

- > at **CaixaBank branches** open to the public;
- > at: [www.caixabank.com/ejerciciodederechos](http://www.caixabank.com/ejerciciodederechos);
- > by writing to **Apartado de Correos (Post Office Box) 209, 46080, Valencia**.
- > By post to CaixaBank Asset Management SGIIC, SAU; Pº de la Castellana, 189 –5ª planta 28046 Madrid.
- > "**Privacy**" section of the CaixaBank Asset Management website

([www.caixabankassetmanagement.com](http://www.caixabankassetmanagement.com)) using the link "**Data Protection: Exercise of Rights**".

In addition, if you have any complaints arising from the processing of your data, you can address them to the **Spanish Data Protection Agency** ([www.aepd.es](http://www.aepd.es)).

## 5. Data processed

We will use the data detailed below in the processing explained in this Policy.

Not all of the data we inform you about is used in all data processing. In section 6, where details are provided of the data processing that we perform, you can consult, for each type of specific processing, the data categories processed.

The typologies and details of the data used by the different processing operations described in section 6 are as follows:

- > **Data that you have provided to us when registering your contracts or as part of your relationship with us through interviews or forms.**

These are the typologies and the details of the data:

- **Identification and contact details:** Name and surname, gender, postal, telephone and electronic contact information, place of residence, nationality, date of birth, language of communication, identification number and voice.
- **Details of their professional or occupational activity and socio-economic data:** Professional or employment activity, income or remuneration, household, level of education, assets, fiscal data and tax data.

- > **Data observed in the contracting and maintenance of products and services.**

The types of data and their details are:

- **Contracting data:** Products contracted, as holder, authorised or representative, information on the status of the position and movements made in the corresponding contracts, including the type of transaction, the name of the Collective Investment Scheme to which it refers and the amount.
- **Basic financial data:** Current and historical balances of contracted products
- **Third-party data observed in statements and receipts in your demand and payment accounts:** information on the entries and movements made by third party issuers in your accounts, including the transaction type, the issuer, the amount and the concept that appear in bills, and transaction statements for debit, credit and pre-paid cards.
- **Details of communications with you:** Data obtained from chats, message boards, videoconferences, telephone calls or equivalent means.
- **Own navigation data:** data from your browsing on our website and your use of it: Browsing history (pages visited and clicks on content), if you have accepted the use of cookies and similar technologies on your browsing devices.

- > **Data inferred or deduced from the analysis and processing of the rest of the data.**

The types of data and their details are:

- **Data obtained from running statistical models:** We use the results generated by statistical models with customer data to perform a risk assessment or customer scoring for classification purposes as part of the prevention of money laundering and terrorist financing, with a view to complying with our regulatory obligations.

- > **Data obtained from publicly available sources, public records or external sources:**

The types of data and their details are:

- **International sanctions data:** Data of persons or entities that are included in laws, regulations, guidelines, resolutions, programmes or restrictive measures regarding international economic and financial sanctions imposed by the United Nations, the European Union, the Kingdom of Spain, as well as the Office of Financial Sanctions Implementation (OFSI) of His Majesty's Treasury (HMT) of the United Kingdom and/or the U. S. Department of the Treasury's Office of Foreign Assets Control (OFAC).
- **Data on directors, functional positions and corporate links:** data extracted from INFORMA's databases that we will use to complement the information on your activity.
- **Information obtained from publicly available sources and public records:** data provided by public access sources and public registries to check the information you provide in your application and in maintenance and fulfilment of the contractual relationships, information from the Equifax bankruptcy consultations file and additional contact data from telephone directories (such as White Pages, Yellow Pages and Lleida.net) and from the INFORMA database, to contact our clients in the event of non-fulfilment of contractual obligations.

These databases are already authorised to have this information.

## 6. How we process your data

We will process your data for different purposes and on different legal bases:

- > Processing necessary for **fulfilment of contractual relationships**
- > Processing necessary to comply with **regulatory obligations**
- > Processing based on the **legitimate interests** of CaixaBank AM.

In addition to the general processing detailed below, we may carry out specific processing operations not covered by this policy, arising from your requests for products or services. We will provide detailed information on such processing when processing the specific request.

### 6.1 PROCESSING NECESSARY FOR THE EXECUTION OF CONTRACTUAL RELATIONS

These data processing operations have as their legal basis the fact that they are necessary to manage the contracts you request or to which you are a party, or to apply, at your request, pre-contractual measures, as set out in art. 6.1.b) of the General Data Protection Regulation (GDPR).

They are therefore necessary for you to establish and maintain a contractual relationship with us. If you object to such processing, we would terminate the relationship or not be able to begin it if it had not yet started.

**The processing required for execution of the contractual relations is indicated in the following section (A), highlighting: a description of the purpose (Purpose), the types of data processed (Types of data processed), whether they are processed jointly with other CaixaBank AM Group companies (Joint Controllers/Processors) and, if applicable, information on the use of profiles (Use of Profiles), as well as other relevant information about the processing (Other relevant information).**

#### **A. Formalisation, maintenance and execution of Contractual Relationships**

**Purpose:** The purpose of this data processing is to formalise and maintain the Contractual Relationships that you and we establish including the processing of your requests or mandates, the steps prior to a contract (pre-contractual relationships) and the establishment of measures to ensure compliance with the contracts you have with us.

This data processing involves collecting the information necessary to establish the relationship or manage the request and processing the information necessary for the correct maintenance and execution of the contracts.

The processing activities carried out in the formalisation, maintenance and execution of the Contractual Relationships are:

- Collection and registration of the data and documents necessary for the contracting

of the products requested.

- Formalise the signing of the corresponding contracts
- Manage the functioning of the products that you have arranged with us, including handling any incidents that may arise and the recording and verification of the accounting entries that occur as part of subscriptions/refunds of the products arranged, the management of the collection of fees or, where appropriate, the refund, the sending of operational communications, as well as any procedures required to ensure compliance with the commitments assumed as part of the arrangement of specific products.

**Type of data processed:** The types of data we process for this purpose, the contents of which are detailed in section 5, are as follows:

- Identification and contact details
- Data on your professional or occupational activity and socioeconomic data
- Contracting data
- Basic financial data

**Data controller:** CaixaBank AM is responsible for this processing. This processing is not carried out on a joint basis.

However, as the products managed by CaixaBank AM are marketed by CaixaBank, S.A., that entity is responsible for processing your data in its capacity as the marketing entity.

## 6.2 PROCESSING NECESSARY TO COMPLY WITH REGULATORY OBLIGATIONS

The legal basis for this data processing is the fact that it is necessary in order to comply with a legal obligation incumbent on us, as set out in art. 6.1.c) of the General Data Protection Regulation (GDPR).

They are therefore necessary for you to establish and maintain Contractual Relationships with us. If you did not want us to perform this processing, we would have to terminate those relationships, or we would not be able to establish them if they were yet to start.

**The treatments necessary to comply with regulatory obligations are listed below in order from (A) to (D).** For each, we will detail: a description of the purpose (**Purpose**), the types of data processed (Types of data processed), whether they are processed jointly with other CaixaBank AM Group companies (**Joint Controllers/Processors**) and, if applicable, information on the use of profiles (**Use of Profiles**), as well as other relevant information about the processing (**Other relevant information**).A.

### A. Processing to comply with the Prevention of Money Laundering and Terrorist Financing (AML/CFT) Regulations

**Purpose:** The purpose of these processing operations is the adoption of the measures imposed on our activity by **Law 10/2010, on the Prevention of Money Laundering and the Financing of Terrorism**.

The processing operations carried out to comply with the regulations on the prevention of money laundering and terrorist financing are as follows:

- Collecting information and documentation to facilitate compliance with due diligence and know-your-customer measures;
- Verifying the information you provide us;
- Check whether you hold or have held positions of public responsibility;
- Categorise your risk level, according to which the different due diligence measures will be applied pursuant to the Anti-Money Laundering and Counter Terrorist Financing regulations;
- Carry out the analysis of the transactions carried out, in accordance with legal

obligations;

- Verify your relationship with companies and, if necessary, your position of control in the ownership structure;
- Communicate and update, each month, the information each month in the Financial Ownership File, for which responsibility lies with the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences (SEPBLAC);

**Type of data processed:** The types of data we process for this purpose, the contents of which are detailed in section 5, are as follows:

- Identification and contact details
- Data on your professional or occupational activity and socioeconomic data
- Contracting data
- Basic financial data
- Third-party data observed on statements and receipts of current and payment accounts of any of the jointly responsible companies
- Details of communications with you
- Data obtained from running statistical models
- Data on directors, functional positions and corporate relationships
- Information obtained from publicly available sources and public records

**Use of profiles:** This processing involves the creation of a profile which we use exclusively for the adoption of the measures imposed on our activity by Law 10/2010, on the Prevention of Money Laundering and the Financing of Terrorism.

- **Purpose of the profile:** The profile is used to prevent the contracting of transactions susceptible to money laundering or terrorist financing.
- **Consequences:** Profiles are tools that help anti-money laundering and terrorist financing prevention units to determine whether or not transactions are susceptible to money laundering or terrorist financing and therefore whether or not to accept them.

**Joint controllers of processing:** The following CaixaBank Group companies will process your data in co-responsibility for this processing.

- CaixaBank, S.A.
- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- VidaCaixa, S.A. de seguros y reaseguros
- BPI Vida e Pensões - Companhia de Seguros, S.A.
- Nuevo Micro Bank, S.A.U.
- CaixaBank Asset Management SGIC, S.A.U.
- Telefónica Consumer Finance, E.F.C., S.A.
- Buildingcenter, S.A.U.
- Livingcenter Activos Inmobiliarios, S.A.U.
- Unión de Crédito para la Financiación Mobiliaria e Inmobiliaria, CREDIFIMO, E.F.C., S.A.U.
- Corporación Hipotecaria Mutual, S.A.U., Establecimiento Financiero de Crédito
- CaixaBank Wealth Management Luxembourg, S.A.
- CaixaBank Asset Management Luxembourg, S.A.
- BPI Gestão de Ativos, SGOIC, S.A.

- Banco BPI, S.A.
- Bankia Habitat, S.L.U.
- Puerto Triana, S.A.U.

The essential aspects of the joint responsibility processing agreements can be consulted at: [www.caixabank.es/empresasgrupo](http://www.caixabank.es/empresasgrupo).

## **B. Processing for compliance with tax regulations**

**Purpose:** The purpose of this processing is the adoption of the measures imposed on our activity by Law 58/2003, of 17 December, General Tax Law, Royal Decree 1021/2015, of 13 November, establishing the obligation to identify the tax residence of persons who hold ownership or control of certain financial accounts and to report on them under mutual assistance and other tax regulations in force.

The processing operations that are carried out to comply with tax regulations are:

- Collect the information and documentation relating to your taxation as provided for in the tax rules and regulations;
- Report data to the public administration relating to its taxation, as stipulated in the regulations or when required by the authority.

**Type of data processed:** The types of data we process for this purpose, the contents of which are detailed in section 5, are as follows:

- Identification and contact details
- Data on your professional or occupational activity and socioeconomic data
- Contracting data.
- Basic financial data.

**Joint controllers of processing:** The following CaixaBank Group companies may process your data with joint responsibility:

- CaixaBank, S.A.
- VidaCaixa, S.A. de seguros y reaseguros
- Nuevo Micro Bank, S.A.U.
- CaixaBank Asset Management SGIC, S.A.U.

The essential aspects of the joint responsibility processing agreements can be consulted at: [www.caixabank.es/empresasgrupo](http://www.caixabank.es/empresasgrupo).

## **C. Processing for compliance with obligations under international financial sanctions and countermeasures policies**

**Purpose:** The purpose of this form of processing is to adopt the measures imposed on our activity by international financial sanctions and programmes of countermeasures adopted by the European Union and the Kingdom of Spain.

In order to comply with international financial sanctions and countermeasures programmes, we will check if you appear on lists of persons or entities that are included in laws, regulations, directives, resolutions, programmes or restrictive measures in the field of international economic and financial sanctions imposed by the United Nations, the European Union and/or the Kingdom of Spain.

**Type of data processed:** The types of data we process for this purpose, the contents of which are

detailed in section 5, are as follows:

- Identification and contact details
- Data relating to international sanctions.

**Other relevant information:** Below, other important information is provided about this form of processing:

**Sanctions programmes:** CaixaBank AM consults the international economic and financial sanctions programmes adopted by the Office of Financial Sanctions Implementation (OFSI) of His Majesty's Treasury (HMT) in the United Kingdom and the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) based on our legitimate interest, as reflected in section 6.3.A.

**Joint controllers of processing:** The following CaixaBank Group companies may process your data with joint responsibility:

- CaixaBank, S.A.
- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- VidaCaixa, S.A. de seguros y reaseguros
- Nuevo Micro Bank, S.A.U.
- CaixaBank Asset Management SGIC, S.A.U.
- Telefónica Consumer Finance, E.F.C., S.A.
- Buildingcenter, S.A.U.
- Livingcenter Activos Inmobiliarios, SAU.
- Unión de Crédito para la Financiación Mobiliaria e Inmobiliaria, CREDIFIMO, E.F.C., S.A.U.
- Corporación Hipotecaria Mutual, S.A.U., Establecimiento Financiero de Crédito
- Banco BPI, S.A.
- CaixaBank Wealth Management Luxembourg, S.A.
- Bankia Habitat, SLU
- Caixabank Equipment Finance, S.A.
- Puerto Triana, S.A.U.
- Caixabank Asset Management Luxembourg, S.A.
- BPI Gestão de Ativos, SGOIC, S.A.
- BPI Vida e Pensões - Companhia de Seguros, S.A.

The essential aspects of the joint responsibility processing agreements can be consulted at: [www.caixabank.es/empresasgrupo](http://www.caixabank.es/empresasgrupo).

#### **D. Processing of complaints and claims.**

**Purpose:** The purpose of this data processing is to address queries, complaints and claims made to CaixaBank AM, in line with the regulations applicable to its status as a financial institution; specifically, Law 35/2003, of 4 November, on Collective Investment Institutions, Law 44/2002 of 22 November, as well as Order ECO/73/2004, which makes it compulsory to have a customer service department for addressing complaints and claims from financial customers.

In turn, Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights, requires that the data controller, in this case CaixaBank AM, addresses any claims filed before its Data Protection Officer, as well as addressing any data protection rights that may be exercised by data subjects.

The processing operations carried out to comply with the regulations on the processing of complaints



and claims are as follows:

- Receipt of the financial customer's complaint or claim by the CaixaBank Customer Service Department, with which CaixaBank AM is affiliated;
- Response within the established time limit to the complaint or claim submitted, and;
- Addressing the data protection rights and queries with CaixaBank's Data Protection Officer, as well as the activities required to collaborate with the supervisory authority (Spanish Data Protection Agency)

**Types of data processed:** The types of data we will process for this purpose, the content of which is detailed in section 5, are as follows:

- Identification and contact details
- Contracting data
- Basic financial data
- Details of communications with you

**Data controller:** CaixaBank AM is responsible for this processing. This processing is not carried out on a joint basis.

### 6.3 PROCESSING BASED ON THE LEGITIMATE INTEREST OF CAIXABANK AM

The legal basis for this processing is to meet the **legitimate interests** pursued by CaixaBank AM or a third party, **except where such interests are overridden by your interests or fundamental rights and freedoms**, as provided for in art. 6.1.f) of the General Data Protection Regulation.

The performance of these processing activities shall imply that we have weighed your rights against our legitimate interest, having concluded that the latter prevails. We would not process the data if this were not the case. You may consult the analysis involving the weighting of the legitimate interest of a processing activity at any time by sending your query to the following email address [delegado.proteccion.datos@caixabank.com](mailto:delegado.proteccion.datos@caixabank.com).

Furthermore, **you are hereby informed that you have the right to object to processing based on legitimate interest**. If you believe that CaixaBank AM, and where applicable, the jointly responsible companies, should consider any specific circumstances or other reasons that justify ending the data processing, you can file this request simply and free of charge using the channels indicated in section 4.

These treatments are listed below, in order from (A) to (B). For each, we will detail: the legitimate interests of CaixaBank AM (**Legitimate interests of CaixaBank AM**), the description of the purpose (**Purpose**), the type of data processed (**Type of data processed**), whether they are processed jointly with other CaixaBank AM Group companies (**Joint Controllers/Processors**) and, if applicable, **information** on the use of profiles (**Use of Profiles**), as well as other relevant information about the processing (**Other relevant information**).

#### A. OFSI and OFAC international financial sanctions and countermeasures policies

**Legitimate interest of CaixaBank AM:** The legitimate interest of CaixaBank AM and the co-responsible companies listed in this section in carrying out this processing is to comply with the international financial sanctions and countermeasures programmes of the United States and the United Kingdom, in order to be able to carry out their business activities in those countries.

**Purpose:** The purpose of this processing is to take the measures provided for in the international financial sanctions and countermeasures programmes adopted by the Office of Financial Sanctions Implementation (OFSI) of His Majesty's Treasury (HMT) in the United Kingdom and the U. S. Department of the Treasury's Office of Foreign Assets Control (OFAC).

To ensure compliance with these international financial sanctions and countermeasures programmes, we will check whether you are listed as a person or entity covered by the restrictions

imposed by these two bodies.

**Types of data processed:** The types of data we will process for this purpose, the contents of which are detailed in section 5, are:

- Identification and contact details
- Data related to international sanctions

**Other relevant information:** Below you will find other important information about this treatment:

- **Right to object to processing:** If you believe that CaixaBank AM should take into consideration any particular situation or other reasons that justify us ceasing to process your data, you may request this easily and free of charge using the channels indicated in section 4.

If you decide to exercise your right of objection, we will stop processing the data without you having to give any reason.

**Joint controllers of processing:** The following CaixaBank Group companies may process your data with joint responsibility:

- CaixaBank, S.A.
- CaixaBank Payments & Consumer, E.F.C., E.P., S.A.U.
- VidaCaixa, S.A. de seguros y reaseguros
- Nuevo Micro Bank, S.A.U.
- CaixaBank Asset Management SGIC, S.A.U.
- Telefónica Consumer Finance, E.F.C., S.A.
- Buildingcenter, S.A.U.
- Livingcenter Activos Inmobiliarios, S.A.U.
- Unión de Crédito para la Financiación Mobiliaria e Inmobiliaria, CREDIFIMO, E.F.C., S.A.U.
- Corporación Hipotecaria Mutual, S.A.U., Establecimiento Financiero de Crédito
- Banco BPI, S.A.
- CaixaBank Wealth Management Luxembourg, S.A.
- Bankia Habitat, S.L.U.
- CaixaBank Equipment Finance, S.A.
- Puerto Triana, S.A.U.
- CaixaBank Asset Management Luxembourg, S.A.
- BPI Gestão de Ativos, SGOIC, S.A.
- BPI Vida e Pensões - Companhia de Seguros, S.A.

The essential aspects of the joint responsibility processing agreements can be consulted at: [www.caixabank.es/empresasgrupo](http://www.caixabank.es/empresasgrupo).

## **B. Satisfaction Surveys and Relevance Surveys**

**Legitimate interest of CaixaBank AM:** The legitimate interest of CaixaBank AM, as data controller, is to improve the level of service provided to customers and their level of satisfaction, as well as to establish improvement plans based on the results of these surveys and to focus its strategy on the material issues that most concern its customers, thereby improving the corporate image and reputation of CaixaBank AM.

In relation to this processing, "Customer" means CaixaBank, S.A. customers who are unitholders

in at least one mutual fund, as the first holder thereof and who have an outstanding balance and who are therefore also customers of CaixaBank AM.

**Purpose:** The purpose of this processing is to carry out satisfaction surveys (over the phone) and surveys (*online*) about the relevance to CaixaBank AM customers in order: **i)** to measure the level of customer satisfaction and identify new opportunities for improvement (satisfaction surveys) and, **ii)** to determine the material issues of greatest concern to customers in order to prioritise and focus CaixaBank AM's strategy on these issues of greatest relevance and impact (materiality surveys).

**Types of data processed:** the types of data we will process for this purpose are as follows:

- **Identification and contact details:** name and surname, gender, electronic (e-mail) and telephone (landline or mobile) contact information, date of birth and language of communication.
- **Contracting data:** products and services contracted and requested, status as holder, authorised or representative of the product and service contracted and information on investments made and their evolution.
- **Basic financial data:** Current and historical balances of products and services.

As regards the storage period of the data processed, the data will be retained for as long as necessary for the sending of satisfaction and materiality surveys and the generation of their results. Subsequently, they are retained for 3 years for additional purposes and after this period they will be destroyed.

**Data source:** The personal data processed comes from CaixaBank, S.A.

**Other relevant information:** Below, other important information is provided about this form of processing:

- **Right to object to processing:** If you believe that CaixaBank AM should take into consideration any particular situation or other reasons that justify us ceasing to process your data, you may request this easily and free of charge using the channels indicated in section 4. You also have the right to object to this processing before the survey is actually carried out (over the phone and *online*).

If you decide to exercise your right of objection, we will stop processing the data without you having to give any reason.

**Data controller:** CaixaBank AM is responsible for this processing. This processing is not carried out on a joint basis.

**Data processors:** CaixaBank AM will, where appropriate, commission a third party to undertake the satisfaction and relevance surveys, which will be legally regulated by signing the corresponding contract with said entities.

## 7. Data recipients

### Joint controllers/processors

The data we process in your capacity as a CaixaBank AM customer is processed by CaixaBank AM. If responsibility for processing is shared, processing is carried out by CaixaBank Group companies, based on the explanation provided for each type of processing.

### Authorities or official bodies

Collective Investment Schemes Management Companies (SGIIC) such as CaixaBank AM may be legally obliged to provide information on our activities to the authorities or official bodies of other countries both inside and outside the European Union. This obligation arises as part of the fight against the financing of terrorism and serious organised crime and the prevention of money laundering, as well as in the framework of the prudential supervision of financial institutions by the Supervisory Authorities.

Payment systems and technology service providers with whom we maintain relationships and to whom we transfer data to undertake transactions may also be subject to this duty.

### **Communication as part of the outsourcing of services**

Sometimes we use service providers with potential access to personal data.

These service providers provide adequate and sufficient guarantees in relation to the processing of data, as we carry out a responsible selection of service providers that incorporates specific requirements in the event that the services involve the processing of personal data.

Likewise, when we formalise our relations with these suppliers, we have the necessary mechanisms in place to ensure that they guarantee compliance with the provisions established in the GDPR and the LOPDGDD, as well as CaixaBank's corporate principles on data protection.

The types of services we can commission service providers to provide are:

- > Financial back-office services
- > Administrative support services
- > Audit and consultancy services
- > Legal services
- > Marketing and advertising services
- > Survey services
- > Logistics services
- > Physical security services
- > IT services (systems and information security, cyber security, information systems, architecture, hosting, data processing)
- > Telecommunications services (voice and data)
- > Print, enveloping, mailing and courier services
- > Information custody and destruction services (digital and physical)
- > Maintenance services for buildings, installations and equipment

## **8. Data retention periods**

### **Storage for the maintenance of the Contractual Relationships**

We will process your data for as long as the Contractual Relationships we have established remain in force.

### **Storage in compliance with legal obligations and the preparation, exercise and defence of claims.**

After termination of the contractual or business relationship you have established with us, we will retain your data only for the purpose of complying with legal obligations and to enable the formulation, exercise or defence of claims during the period of limitation of actions arising from the contractual relationship.

We will process these data by applying the necessary technical and organisational measures to ensure that they are only used for these purposes.

### **Destruction of data**

We will destroy your data when the retention periods imposed by the regulations governing the activity

of CaixaBank AM and the statute of limitations for administrative or legal actions arising from the relations established between you and us have elapsed.

## 9. Data transfers outside the European Economic Area

At CaixaBank AM we process your data within the European Economic Area and, in general, we contract service providers also located within the European Economic Area or in countries that have been declared to have an adequate level of protection.

If we need to use service providers who process data outside the European Economic Area or in countries that have not been declared to have adequate levels of protection, we will ensure that the security and legitimacy of the processing of your data is guaranteed.

To ensure this, we require adequate guarantees from these service providers in accordance with the provisions of the GDPR such that they have, for example, binding corporate rules that guarantee the protection of data in a manner similar to that established in European standards or that they subscribe to the European Union's standard clauses. You can request a copy of the appropriate guarantees required by CaixaBank AM from these suppliers by contacting the Data Protection Officer at [www.caixabank.com/delegadoprotecciondedatos](http://www.caixabank.com/delegadoprotecciondedatos).

## 10. Automated decisions

If during your Contractual Relationships with us we use mechanisms that could make decisions based solely and exclusively on automated processing (i.e. without the participation of a person) that could have a legal effect on you, or that could significantly affect you (for example, denying your contracting of a product), we will inform you about this in the contractual documentation for the product or service that you have requested, in addition to the logic behind the decision.

We will also, at that time, take steps to safeguard your rights and interests by providing you with the right to obtain human intervention, to express your views and to challenge the decision.

## 11. Review

We will review this Privacy Policy from time to time as necessary to keep it up to date, for example, when new rules or criteria are published or new processing is performed.

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