

**SANTANDER CORPORATE & INVESTMENT BANKING (SCIB)
PRIVACY POLICY**

Basic information on data protection

Data controller	<p>Banco Santander, S.A.</p> <p>Registered address: Paseo de Pereda, 9–12, Santander.</p> <p>Postal address: Calle Juan Ignacio Luca de Tena, 11; 28027 Madrid.</p> <p>Email address: scibprivacy@gruposantander.com.</p> <p>Data protection officer contact details: privacidad@gruposantander.es</p>
Purposes and legal basis	<p>To manage our contractual and commercial relationships, based on the performance of the contract between the parties and the legitimate interest in contacting the entity you represent;</p> <p>To send you commercial offers by electronic means, based on the legitimate interest of Santander in informing customers about similar products and services if you are identified as a contact or representative of a customer, and unless you object;</p> <p>To comply with the laws to which Santander is subject, including banking and financial regulations and those related to anti-money laundering and countering of the financing of terrorism, based on a legitimate interest recognised by financial regulators and to meet applicable legal obligations; and</p> <p>as described in this Privacy Policy.</p>
Recipients	<p>Santander Group entities detailed in this Privacy Policy.</p> <p>Furthermore, your data may be disclosed to the Spanish Public Administration and Judicial Authorities, the Bank of Spain, SEPBLAC, and authorities or official bodies of other countries.</p>
Rights	<p>You may exercise your rights of access, rectification, deletion, objection, portability and restriction of processing at any time by sending an email to scibprivacy@gruposantander.com. For further details, please see Section I.</p>
Additional information	<p>You can access our Privacy Policy below to help you understand better how we use and process your personal information, the categories of personal information we collect, how we collect it, what we use it for and who we may share it with.</p>

Pursuant to the provisions of applicable data protection regulations and this Privacy Policy, Banco Santander, S.A. (hereinafter "**we**" or "**Santander**") would like to inform you about how your personal data is processed, including but not limited to personal data that we process in the context of:

- business-to-business and/or direct marketing commercial transactions, including the Santander Corporate Investment Banking (SCIB) CRM application; and
- anti-money laundering, countering the financing of terrorism and international sanctions, as part of the onboarding process and throughout the commercial or contractual relationship, with a risk-based approach.

In certain circumstances, we may collect data and information about the data subject, even if we do not have a direct relationship with them (for example, in the course of our relationship with our customers or counterparties). When you provide us with personal data related to other data subjects, please make sure that you inform them about the disclosure of their personal data and invite them to read this Privacy Policy.

Santander fully complies with regulations governing the protection of personal data, and, in particular, with 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**"), and any local laws that may apply depending on the country where the data subject is located, so as to ensure that any personal information is processed in compliance with the legally enforceable safeguards and obligations.

In accordance with applicable regulations, Santander implements appropriate technical and organisational measures to ensure an adequate level of security appropriate to the risk, thus preventing the accidental or unlawful destruction, loss, alteration, access or unauthorised disclosure of personal data. Likewise, Santander complies with the duty of secrecy and confidentiality regarding the personal data it processes.

I. How can you exercise your rights when we process your personal data?

We will only process data that is appropriate, relevant and limited to the services provided, processing it strictly as necessary for the purpose for which it was collected.

You may exercise your rights of access, rectification, deletion, objection, portability and limitation of data processing (or any others recognised by law), or ask any questions relating to the processing of your personal data under this Privacy Policy, at any time, by sending an email to scibprivacy@gruposantander.com.

II. Who is the data protection officer (DPO) and how can they be contacted?

The data protection officer is entrusted with monitoring and compliance functions to ensure that the personal data we process is properly protected and processed in accordance with the GDPR and applicable regulations.

If you would like to request more information or wish to file a complaint about an infringement of your privacy, you may contact our DPO by sending an email to privacidad@gruposantander.es.

Without prejudice to any other administrative appeal or judicial action, you have the right to file a claim with the Spanish Data Protection Agency at www.aepd.es.

III. What personal data do we process and how do we obtain your data?

- a. What is the source of the personal data we process?**

The personal data we process as a data controller is obtained directly from the data subject or through the legal entity to which the owner of the personal data provides services or represents, and which holds a commercial or contractual relationship with Santander¹.

b. What types of personal data do we collect and process?

As a data controller, we process the following categories of personal data, where applicable:

- Customer identification data: name and surname, ID copy (NIF/DNI/NIE) and signature.
- Professional and contact details: address, email address and telephone number.
- Personal characteristics data: date of birth, country of residence and nationality.
- The data subject's position or role in the organisation to which they belong.
- Data and information collected during the data subject's visits to our website (including IP address, online identifiers, login data, browser type and version, device type, time zone setting, etc.) and browsing habits (including passwords used on Santander websites, the data subject's preferences in receiving marketing information, and information about how the data subject uses and browses the website). To learn more about our use of cookies or similar technology, please see our Cookies Policy at:
https://www.santandercashnexus.com/cookiespolicy_en.html

IV. For what purposes is your personal data processed and what are the legal bases for its processing?

- 1. Management of the contractual and commercial relationship between Santander and the company you work for or represent.** Your personal data is processed when it is necessary to perform a contract to provide our corporate customers with the products and services subscribed to under the applicable contract, where necessary for this purpose, and does not undermine the rights and freedoms of data subjects or create an imbalance between its rights and those of the data subjects. The legal basis is the performance of the contract between the parties and the legitimate interest in contacting the company you represent.
- 2. Management of the request for information** that the data subject sends us through the contact form on the website or by other means (via telephone or email). This processing is necessary in order to file and process the data subject's request before the contract is entered into between the parties.
- 3. To send you commercial offers by electronic means of products and services that are similar or equivalent to those previously contracted by the customer.** The legal basis for this processing is Santander's legitimate interest in informing its customers about similar products and services, if the data subject is identified as a contact or representative of a customer, and unless the data subject objects.
- 4. To send you invitations to events** organised by Santander or by third parties, whose attendance is always voluntary and may require additional registration data from the data subject. The legal basis for this processing is our legitimate interest in maintaining our commercial relationships with our customers. The data subject may object to receiving this type of communication at any time.
- 5. To send you surveys concerning the quality of the services provided.** We may send invitations to participate in these surveys and assess the quality of the service contracted by the company the data subject works for. The legal basis for this processing is the Bank's legitimate interest in assessing the quality of services.

¹ Santander Corporate & Investment Banking may include all the SCIB areas of the different financial institutions that make up the Santander Group.

6. **Oversight of operations and transactions to manage, prevent and detect fraud** through expert reports with the aim of analysing the risk level of our customers, including personal data of their legal representatives, agents, advisors and suppliers, based on a legitimate interest recognised by financial regulators and to meet applicable legal obligations.
7. **Compliance with the laws to which Santander is subject, including but not limited to banking and financial regulations, and those related to anti-money laundering and countering the financing of terrorism**, including measures designed to prevent and combat financial crimes and sanctions regimes (OFAC, UN, EU and OFSI, among others). As part of a banking group, we have a robust system for anti-money laundering and countering the financing of terrorism in each of the entities managed, as well as a system for applying local, European and international sanctions which may require the processing of the data subject's personal data. In this context, we carry out processing operations through Know Your Customer (KYC) processes (to identify data subjects, verify their identity and screen their details against sanctions lists, prior to and during the provision of our services). We also undertake analysis procedures for high-risk customers, Politically Exposed Persons (PEPs), customer database screening and transaction filtering, reasonably designed to ensure compliance with applicable laws, among others. This includes data of related parties, such as the ultimate beneficial owner/controller, directors or contacts that may be required for a risk-based approach. We carry out these checks when data subjects enter into a relationship with Santander, and also throughout the relationship.
8. **Identification of authorised representatives and the powers conferred, as applicable.** The legal basis for the personal data provided by the customer for this purpose is based on the execution of pre-contractual measures and, where appropriate, on the management of the contractual relationship.

V. How long will we keep your personal data?

The personal data provided shall be stored: (i) for the duration of the commercial or contractual relationship with the company the data subject provides services to or represents, and as long as the latter does not exercise their right to deletion; (ii) to respond to legal or regulatory claims; and (iii) for the period required by applicable law.

Most personal data collected in relation to a specific customer is retained for the duration of the contractual relationship. The storage period is extended to ten years for information processed subject to anti-money laundering regulations.

Once these periods have expired, personal data will be deleted or anonymised.

VI. With whom do we share your personal data?

The data subject's personal data may be shared between Santander Group entities, where necessary, for the management, maintenance and control of our contractual and commercial relationships, to comply with our regulatory obligations and to prevent fraud. In this context, the following entities may process your personal data:

- Banco Santander Totta, S.A., with head office at Rua do Ouro no. 88, 1100-063, Lisbon, PORTUGAL.
- Santander Bank Polska S.A. with head office at al. Jana Pawła II 17, 00-854 Warsaw, POLAND.
- Banco Santander Río S.A., with head office at Av. Juan de Garay 151, Ciudad Autónoma de Buenos Aires, ARGENTINA.
- Banco Santander S.A. (Uruguay), with head office at Julio Herrera y Obes 1365, 11100, Montevideo, URUGUAY.
- Banco Santander (México), S.A., Institución de Banca Múltiple, with head office at Avenida Prolongación Paseo de la Reforma, No. 500, Colonia Lomas de Santa Fe, C.P. 01219, Mexico City, MEXICO.

- Banco Santander (Brasil) S.A., with head office at Av. Presidente Juscelino Kubitschek 2041/2235, Vila Olímpia, São Paulo/SP, BRAZIL.
- Santander Bank, N.A. with head office at 75, State Street, Boston, 02109 Massachusetts, USA.
- Santander US Capital Markets LLC, with head office at 437 Madison Avenue, New York, 10022 New York, USA.
- Banco Santander-Chile, with head office at Bandera, 140 Santiago de Chile 8340455, Santiago Metropolitan Region, CHILE.
- Banco Santander de Negocios Colombia S.A., with head office at Calle 93 A No. 13–24, Bogotá, 110221, COLOMBIA.
- Banco Santander (Perú), S.A., with head office at Avenida Ricardo Rivera Navarrete 475, San Isidro, 15046, Lima, PERU.

Each entity acts as a separate data controller and the purpose of this communication is to carry out the tasks described in this Privacy Policy, which, in any case, seeks to always offer the best service to our business customers.

For the management of our contractual and commercial relationships, we manage databases designed in such a way that not all users have access to all the data, but that each user is granted different permissions on a need-to-know basis. Each Group entity views and registers the employee contact details of the entities with which it has a contractual or commercial relationship (as such, for example, the contact details of employees of an entity in Brazil would be registered by the Santander Brazil team, which would have access to this data). However, certain employees may be granted global access permission enabling them to view any registered profiles if necessary.

Data subjects' data may also be disclosed to:

- Spanish Public Administration and Judicial Authorities, when required in accordance with the legislation in force.
- The Bank of Spain, to which we are obliged to provide all the necessary data to identify customers or representatives who could directly or indirectly involve a credit risk. Santander processes data relating to customers registered at the Bank of Spain, for the purposes of granting and managing credit operations, which include credit risk assessment and monitoring tasks through screening techniques and expert analysis. Santander also processes the data of these customers in order to comply with the regulations on risk concentration and any other regulations applicable to us within the scope of prudential supervision of credit institutions.
- Authorities or bodies of other countries, located within or outside the European Union, in the context of combating the financing of terrorism, organised crime and money laundering, as well as within the framework of the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences (SEPBLAC), whose powers are exercised by the Sub-Directorate General of Inspection and Control of Capital Movements.
- SEPBLAC: data of ultimate beneficial owner account holders, meaning any natural person who is ultimately responsible for, owns or controls a customer; and their authorised representatives, as well as account opening or closing data, and any modifications thereof.

The Bank follows strict criteria when selecting service providers to ensure compliance with data protection obligations, and it signs data processing agreements with them, binding them to the following obligations, among others: applying appropriate technical and organisational measures; processing personal data for the purposes agreed and only in accordance with documented instructions from the Bank; and deleting or returning the data to the Bank once the services have been provided.

VIII. International data transfers

The disclosure of data described above includes Santander Group entities located outside the European Economic Area. For third countries that do not have an adequacy decision determining that they are a country with a level of protection comparable to that of the European Union, Santander Group has adopted a number of specific and appropriate safeguards, such as signing Standard Contractual Clauses, which ensure that the data subjects have exercisable rights and recourse to effective legal action in accordance with the regulations in force.

Further information about the safeguards adopted may be obtained by sending an email to scibprivacy@gruposantander.com.

X. How will we inform you of changes to this Privacy Policy?

If we modify this Privacy Policy, we will inform you of any changes by sending you an updated version. We are committed to protecting and respecting your privacy and will continue to do so in any future changes we make to this Privacy Policy.