



PRIVACY POLICY

1. Information for Users

I-Transfer Global Payments E.P., S.A., is the CONTROLLER of the personal data of the USER and informs the USER that these personal data will be processed in accordance with Regulation (EU) 2016/679 of 27 April (the GDPR) and Organic Act 3/2018 of 5 December.

One of the values that we identify with is transparency. Your data privacy is therefore very important to us.

When a USER marks the boxes and enters personal data in the fields marked with an asterisk (*) on the contact form or downloaded forms, the USER expressly, freely and unequivocally accepts that we need that data in order to fulfil the USER's requests. Every USER is free to decide whether or not to enter personal data in the other fields. The USER guarantees that the personal data the USER furnishes to the CONTROLLER are true, and the USER is responsible for notifying the CONTROLLER of any changes in the personal data.

The CONTROLLER states that all the data requested over the website are mandatory, because they are needed in order to provide the USER with optimum service. If the USER does not furnish all the required data, the CONTROLLER cannot guarantee that the information and services provided will be entirely suited to the USER's needs.

Under Act 34/2002 of 11 July on services for the information society and e-commerce, we do not send spam, which means we do not send commercial e-mail that the user has not first requested or authorised. So, on each of the forms on our website, the user can expressly consent to receive our newsletter apart from any one-off commercial information the user has asked for.

2. Legal Interest

- Our legal interest in processing user data is based on the consent of the data subject, which we ask for in each particular case. We may process the data we have asked you for when you have expressly given your consent to data processing by checking the "I have read and accept the privacy policy" box on the forms on our website or by any other mechanism we make available to you for unequivocally giving us your consent.
- Our legal interest in managing the service contracting process, the payment process, the invoicing process and related messages comes from our standing as a party to our contract with you.
- Data processing for the purpose of sending e-newsletters about services, events and news related with our professional activity is based on our legitimate interest in this kind of processing under current legislation.
- In addition, our legal interest in processing your data when you send us your CV or sign up for our job offers is based on your consent, which you give when you send us your information. You can withdraw your consent at any time, although that would disqualify you from our employee screening process. Nevertheless, if you withdraw your consent, that does not affect the lawfulness of any processing we have done before you withdraw your consent.

3. International Data Transfers

- GDPR, article 45: You are informed that your data may be processed by personal data processors located in countries that ensure an adequate level of data protection under an adequacy decision taken by the EU Commission. There are therefore no processing risks.



If there is no adequacy decision in accordance with article 45.3 or no appropriate safeguards in accordance with article 46, including binding corporate rules, a transfer or set of transfers of personal data to a third country or international organisation can be done only if one of the following conditions is met:

- GDPR, art. 49.1.c: The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject: In accordance with article 44 of the GDPR, an international data transfer to a country that has not been declared a country with an appropriate level of protection can be authorised only if sufficient safeguards are provided. Thus, it may be authorised if the controller furnishes a written agreement between the data exporter and the data importer stating the necessary safeguards to guarantee respect for the protection of the private life of the data subjects and their fundamental rights and freedoms, and if the exercise of their respective rights is guaranteed.
- Processing risks: I declare that I have been informed about the transfer of data to the provider of the described services (according to the enclosed agreement) and any processing risks due to the absence of appropriate personal data protection safeguards in the country of destination.

4. Transfer of Data

When you engage our services and we provide those services to you, it necessarily involves disclosing your data to the parties involved, the agents that act as intermediaries and, in the case of money remittances abroad, the correspondents who pay the money out in the country of destination and/or the financial institutions that act as intermediaries in your international transfer of funds. There is, therefore, a necessary international data transfer. You expressly accept this when you sign this document, as you must if we are to provide the service.

We also inform you that certain data, within the framework of current legislation or your contractual relationship with us, may be disclosed to:

- government agencies with powers in the industries involved, when current legislation so states;
- law enforcement authorities, by virtue of the law;
- banks and financial institutions, so they can charge for their services;
- other legal professionals, when disclosure is required by law or for the execution of the services you have engaged.
- Lastly, you are informed that we use third-party plugins (applications) that enable this website to connect to social networks and other similar services (like Twitter and FaceBook) to access our social network profiles. Plugin use is voluntary. If you choose to use plugins, you will be authorising the disclosure of personal data (IP address, browsing data) to the social networks in question, and the company that owns this web page will not be liable for any subsequent processing of your data by these social networks. We recommend reviewing the terms and conditions of platforms before you interact with **Everis's** corporate pages on social networks, for more detailed information.

5. Data Storage

Anonymised or pseudonymised data: Anonymised or pseudonymised data may be stored indefinitely.

Contact information processed for commercial purposes: Contact information processed for commercial purposes is stored until the user withdraws consent.



Customer data: The period for storing the personal data of customers varies depending on the service the customer has engaged. In any event, we store customer data for the minimum time necessary. The maximum limits are:

- four years plus the year in progress (National Tax Act, articles 66 et seqq.)
- five years: Civil Code, art. 1964 (personal action without a special time limitation)
- six years: Commercial Code, art. 30 (accounting records, invoices, etc.)
- ten years: money laundering (Act 10/2010 of 28 April, art. 25)

Personal data on the contact form: This data is kept until your request has been dealt with satisfactorily or you have withdrawn your consent.

6. Undertakings by the User

The USER guarantees that he or she is of full legal age and that the information the USER furnishes is accurate and true.

The USER undertakes to inform I-Transfer Global Payments E.P., S.A., of any change in the information furnished by the USER, by e-mailing notice of the change to atencion.cliente@i-transfer.net, identifying him/herself as a USER of the WEBSITE and stating the specific information to be changed.

Moreover, the USER undertakes to keep his or her identification codes and passwords secret and to inform I-Transfer Global Payments E.P., S.A., as soon as possible in the event of loss, theft or unauthorised access. Until and unless the USER notifies I-Transfer Global Payments E.P., S.A., of the loss, theft or unauthorised access of the USER's identification codes and/or passwords, I-Transfer Global Payments E.P., S.A., is exempt of all liability stemming from undue use of the USER's identification codes and passwords by unauthorised third parties.

7. Third-party Data Furnished by the User

If the USER furnishes the personal data of third persons for any purpose, the USER guarantees that the persons concerned are informed in advance and have given the USER their consent to disclose their data to I-Transfer Global Payments E.P., S.A.

The USER guarantees that the persons involved are of full legal age and that the information furnished is accurate and true.

I-Transfer Global Payments E.P., S.A., will verify the consent of the persons involved through an introductory e-mail message with non-commercial contents, asking the persons involved to verify the consent given in their name by the USER.

If liabilities stem from any infringement of these conditions by the USER, the USER will be held liable for the consequences of the infringement.

8. Exercise of Rights

The USER may revoke consent and exercise the rights of access, rectification, cancellation/erasure, objection, restriction and portability by e-mailing our Data Protection Officer at [C/Nieremberg, 29 Bajo - 28002 Madrid \(Madrid\). E-mail: atencion.cliente@i-transfer.net](mailto:atencion.cliente@i-transfer.net), identifying him/herself as a USER of the WEBSITE and stating exactly what the USER wishes to do.



The USER may also exercise the rights of access, rectification, cancellation/erasure, objection, restriction and portability by mailing a letter by ordinary post to the address given in the paragraph above, identifying him/herself as a USER of this WEBSITE, enclosing a photocopy of the USER's Spanish government-issue ID card or equivalent document and stating exactly what the USER wishes to do.

Also, if the USER believes that his or her right to personal data protection has been violated, the USER may file a complaint with the Spanish Data Protection Agency (www.aepd.es).

SECURITY MEASURES

In accordance with current personal data protection legislation, the CONTROLLER complies with all the provisions of the GDPR and Organic Act 3/2018 of 5 December for the processing of personal data that it controls and is plainly complying with the principles described in article 5 of the GDPR, under which principles personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject and are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The CONTROLLER guarantees that it has implemented appropriate technical and organisational policies to apply the security measures called for in the GDPR and Organic Act 3/2018 of 5 December to protect the rights and freedoms of USERS and has given USERS adequate information to enable them to exercise their rights and freedoms.

You are cautioned that this Privacy Policy may change in response to legislative demands. Users are therefore advised to check the Privacy Policy regularly.

For more information about privacy guarantees, contact I-Transfer Global Payments E.P., S.A., at C/Nieremberg, 29 Bajo - 28002 Madrid (Madrid). E-mail: atencion.cliente@i-transfer.net