

## PRIVACY POLICY FOR WEBSITE USERS

This privacy policy (the '**Privacy Policy**') describes how ASEGURADORA ASERTA, S.A. DE C.V., GRUPO FINANCIERO ASERTA, SUCURSAL EN ESPAÑA ('**ASERTA**'), with registered office at Paseo de la Castellana 52, planta 2B, 28046, Madrid (Spain), email address contacto@aserta.com.es and NIF tax identification number W4121985H, will process the personal data provided by users or that we collect from them through our website www.aserta.com.es (the '**Website**').

Please read this Privacy Policy carefully. By providing your personal data or using our Website, ASERTA will process your personal data in accordance with this Privacy Policy.

This Website may contain links from and to third-party websites. If you click on a link to one of these websites, keep in mind that every third-party website has its own privacy policy. ASERTA is not liable in any way for these policies. Please carefully review these policies before providing your personal data to third parties.

### **Data controller**

In accordance with personal data protection legislation, and specifically with Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, regarding the protection of individuals for the processing of personal data and the free circulation of this data and repealing Directive 95/46/EC ('**GDPR**'), we inform you that your personal data will be processed by ASEGURADORA ASERTA, S.A. DE C.V., GRUPO FINANCIERO ASERTA, SUCURSAL EN ESPAÑA, with NIF tax identification number W4121985H, registered office at Paseo de la Castellana 52, planta 2B, 28046, Madrid (Spain) and email address oficinadeprivacidad@aserta.com.es, as the data controller.

### **How we obtain your personal data**

ASERTA may collect the following personal data from Website users:

- (i) The information users provide voluntarily upon filling out the Website forms (e.g., their name, surnames, email address or phone number). Unless specified otherwise, all of the information requested in the forms is needed and required in order to process requests.
- (ii) If a user contacts us for any reason or through any medium (e.g., if they send us an email message), ASERTA will keep a log of the correspondence and process the user's contact details in order to handle the request.
- (iii) ASERTA uses cookies or similar devices to obtain information about visits to its Website and the equipment through which users access the Website. For additional information about how ASERTA uses cookies and similar devices, please refer to our [Cookies Policy](#).

### **How we use your personal data (purpose of the processing and legal basis)**

ASERTA may process the personal data it collects from Website users for the following purposes and as per the legal bases specified below:

- (i) To publish the Website content and information in the most suitable way for users and for the equipment with which they visit the Website, considering our legitimate interest in improving the user experience and ensuring the Website is displayed correctly (in which legitimate interest is the legal basis).

- (ii) To provide the information requested and to process the queries, requests and questions submitted by users through the Website forms or via email or other means of communication when users have granted consent (in which consent is the legal basis).
- (iii) To evaluate the requests and projects submitted through the 'Rate my project' forms, and to contact users with the corresponding project assessment (in which implementing pre-contractual measures at the request of the interested party is the legal basis).
- (iv) To contact users when necessary with regards to their use of the Website (in which our legitimate interest in improving the user experience and ensuring the Website displays correctly are the legal basis).
- (v) After obtaining the interested party's express consent, to carry out initiatives aimed at promotional efforts, seeking out new clients, advertising, marketing products and information for the insurance sector (including the ASERTA newsletter), as well as social, training, recreational, sports, cultural or promotional events planned by or involving ASERTA (in which consent is the legal basis).
- (vi) To share personal data and carry out international data transfers for the purposes and the legal bases explained further on.

When the legal basis is legitimate interest, we have conducted a weighted assessment to ensure it is not prevailed over by your fundamental freedoms, interests and rights that require personal data protection, which are available upon request.

### **Updating your personal data**

When submitting their personal data through the Website, users should verify that this data is accurate. Users should inform us as soon as possible of any changes to their personal data so inaccurate personal data is not stored in our records and databases.

### **Sharing your personal data**

ASERTA may share users' personal data if it is required to do so for legal reasons. Additionally, personal data may be shared with the ASERTA Group entities listed in the 'International data transfers' section for the purposes specified in each instance.

Based on the above, personal data may be shared as soon as it is submitted by a user and they are informed of how their data will be processed as per this Privacy Policy.

Additionally, IT and maintenance service providers, communication agencies, consulting firms and/or appraisal entities, insurance agents and their partners, collection agencies, and information storage and/or destruction service providers, all located in Spain and/or Mexico (the latter covers service providers belonging to the Aserta Financial Group in Mexico), may access the user's personal data through ASERTA for the data processing described in this Privacy Policy.

### **International data transfers**

Users' personal data may be transferred to the entities within the ASERTA Insurance Group in Mexico (transfers between data controllers) listed below:

- (i) To the entities ASEGURADORA ASERTA, S.A. DE C.V., GRUPO FINANCIERO ASERTA, and ASEGURADORA INSURGENTES, S.A. DE C.V., GRUPO FINANCIERO ASERTA, both with registered office at Periférico Sur, número 4829, Interior Piso 9, Colonia Parque del Pedregal, Mexico 14010, Delegación Tlalpan, Ciudad de México (Mexico), for the following purposes and in accordance with the legal bases specified below:
  - a) In the case of website users, data processing will be focused on centralising corporate services and IT maintenance considering our legitimate interest to centralise and improve services within the group.
  - b) Complying with legal obligations as per Mexican legislation considering our legitimate interest to comply with the rules the ASERTA Group is subject to (this legitimate interest is the legal basis).
  - c) After obtaining the interested party's express consent (in which this is the legal basis), to carry out initiatives aimed at promotional efforts, seeking out new clients, advertising, marketing products and information for the insurance sector, as well as social, training, recreational, sports, cultural or promotional events planned by or involving these entities.
  
- (ii) To the entity CORPORACIÓN DE SERVICIOS ASERTA, S.A. DE C.V., GRUPO FINANCIERO ASERTA, with registered office at Rinconada Camino A Santa Teresa 1040, Colonia Jardines en La Montaña, Tlalpan, Distrito Federal, C.P. 14210 (Mexico), for the following purposes:
  - a) In the case of website users, data processing will be focused on centralising corporate services and IT maintenance considering our legitimate interest to centralise and improve services within the group.
  - b) Complying with legal obligations as per Mexican legislation considering our legitimate interest to comply with the rules the ASERTA Group is subject to (this legitimate interest is the legal basis).
  - c) After obtaining the interested party's express consent (in which this is the legal basis), to carry out initiatives aimed at promotional efforts, seeking out new clients, advertising, marketing products and information for the insurance sector, as well as social, training, recreational, sports, cultural or promotional events planned by or involving this entity.

In accordance with Spanish legislation and EU standards on personal data protection, it is deemed that Mexico does not provide an appropriate level of personal data protection. However, ASERTA will ensure that your personal data is processed with the same level of protection as in Spain. In this regard, we inform you that ASERTA has implemented the necessary measures to guarantee international transfers (between two data controllers as well as between a data controller and a data processor, depending on the situation). Specifically, ASERTA has obtained the corresponding authorisation from the Director of the Spanish Data Protection Agency (Agencia Española de Protección de Datos) to perform international transfers to Mexico (transfers between two data controllers), and it has implemented European Commission-type contractual clauses (transfers between a data controller and a data processor), all in accordance with Article 46 of GDPR. To obtain a copy of the documents in question, please submit a request to the address listed in the 'Contact Information and Data Protection Officer' section.

### **Your rights**

Users have the right for ASERTA to confirm whether or not it is processing their personal data, and if so, they may request access to their personal data and to certain information about how it is processed (purpose, categories of processed data and recipients, among other aspects) (**right of access**). They also have the right to rectify their data if inaccurate (**right to rectification**) or to request its erasure when, for example, it is no longer needed for the original purpose for which it was collected (**right to erasure**). If consent has been requested for a specific purpose, the interested party may withdraw it at any time (**right to withdraw consent**). In certain circumstances (e.g., if the interested party refutes the accuracy of their data and it is being verified), users may request to restrict the processing of their personal data and limit its use to only processing claims (**right to restriction of processing**). Finally, users may exercise their right to data portability. This refers to receiving their personal data in a structured, commonly used and machine-readable format, and having the right to transmit that data to another controller, without hindrance from the controller in legally authorised situations (**right to data portability**).

**Additionally, users have the right to object to the processing of their personal data, at any time and for reasons concerning them, when based on ASERTA's legitimate interest or that of a third party, and specifically for direct marketing purposes. In this case, ASERTA will cease to process this data unless it is able to certify legitimate reasons to continue.**

Users may exercise their rights, upon confirming their identity with a photocopy or digital copy of their national ID, passport or other official ID, by sending a written notification to ASEGURADORA ASERTA, S.A. DE C.V., GRUPO FINANCIERO ASERTA, SUCURSAL EN ESPAÑA at Paseo de la Castellana 52, Planta 2B, 28046, Madrid (Spain), or an email to: [oficinadeprivacidad@aserta.com.es](mailto:oficinadeprivacidad@aserta.com.es).

Users may also file a complaint to the Spanish Data Protection Agency (Agencia Española de Protección de Datos), particularly if the option to exercise their rights has not been handled to their satisfaction.

### **Storing personal data**

ASERTA will store the user's data whilst a contractual relationship remains in place and, upon its conclusion, during the period established by the applicable legal, civil, tax or business regulations. After this time, the data will be erased.

Personal data obtained through technical cookies will be processed during the session (except in the case of cookies with up to a one-year duration), and data obtained through non-technical cookies will be processed for up to two years as of when consent was granted. For additional information, please refer to the [Cookies Policy](#).

### **Contact Information and Data Protection Officer**

To contact us with specific queries or questions about this Privacy Policy, please send a message to the following email address: [oficinadeprivacidad@aserta.com.es](mailto:oficinadeprivacidad@aserta.com.es).

You may also contact our Data Protection Officer at the following email address: [dpdaserta@aserta.com.es](mailto:dpdaserta@aserta.com.es).

### **Additional information about personal data protection**

For additional information about your personal data protection and the meaning of terminology such as 'data controller' and 'personal data', please visit the website of the Spanish Data Protection Agency (Agencia Española de Protección de Datos) at the following link: <https://www.aepd.es/>.