bank in SPAIN

Personal Data Protection

Who we are

Bank in Spain is an independent mortgage broker, started by Banking Professionals from Spanish banks.

We offer our services in all of Spain and specialise in finding the best mortgages for non-residents and international clients buying property in Spain.

We continuously monitor the Spanish mortgage market and work with many of the 14 big banking groups currently operating in Spain.

If you have any questions, or want more details on how we use your personal information, you can ask us by contacting us through our website <u>www.bankinspain.com</u> or by calling us on +34 961 04 38 38 or write an e-mail to <u>mail@bankinspain.com</u>

Our privacy promise

We promise:

- To keep your data safe and private
- Not to sell your data
- To securely delete your information when we no longer need it

How we use your personal information

In order to provide you with products and services we need to collect, use, share & store personal and financial information about you.

This includes information which we obtain from you or third parties, such as employers, public information found on the internet, credit referencing and -register agencies (who may check the information against other databases – public or private- to which they have access), or fraud prevention agencies.

This information may come from your interactions with us or with them.

What we use your personal data for

You authorise us to process and disclose information that is provided by you or that we obtain from third parties for the purposes of:

- Assessing and identifying products and services
- Assessing and processing mortgage/loan applications
- Detecting and preventing crime (including money
- laundering)

Types of personal information we obtain

The personal information and documentation that we may obtain and store includes the following:

- Name and Addresses
- Telephone Numbers and E-mail addresses
- National ID number, Passport number and Spanish ID number
- Date of birth
- Gender
- Bank Account details

- Employment details
- Next of kin details
- Account balances and transaction history
- Mortgage and Loan information
- Owned property details and rental agreements
- Copies of documentation to prove your age, address or income. i.e. passport, utility bill, bank statements and tax returns
- Telephone recordings
- IP address and operations system
- Copies of any letters and e-mails to us.

Where you provide personal and/or financial information about others (such as dependants or partners) you confirm that you have their consent or are otherwise entitled to provide this information to us and for it to be used in accordance with the agreement.

How the law protects you

In addition to our privacy promise, your personal information is protected by law.

Data Protection law says that we are allowed to use and process personal information only if we have a reason to do so. This includes sharing your information with third parties. The law says that we must have one or more of the following reasons:

- To fulfil our contract to you by managing your mortgage application(s)
- To carry out regulatory checks and meet our obligations to our regulators
- To protect ourselves against harm to our rights and property
- To prevent and detect fraud, money laundering and other crimes
- When there is a legitimate interest to do so
- When you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. But even then it must not unfairly impact your right to privacy. Below is a list of all the ways in which we may use your personal information and basis under which it is being used:

Where we collect personal data from

We collect personal information about from the following sources:

Data you give to us:

- When you ask for a mortgage quote or mortgage review
- When you apply for a mortgage/loan;
- When you talk to us on the phone;
- In emails and letters you send to us.
- When providing or uploading information on our webpage

Data from third parties:

- Credit referencing and register agencies
- Public information available on the internet

Who we share your personal data with

When you have decided to use Bank in Spain as your mortgage broker, we must share all or some of the information we have obtained in order to secure one or more mortgage offers from a credit institution.

The credit institutions we work with must:

- Be located in the EU/European Economic Area
- Comply to the same strict Data Protection Regulations as ourselves
- Delete your personal information when it is no longer needed.
- Not sell or provide your personal to third parties without your consent (except when required by law).

How long do we keep your information

We will keep your information only for the period we are working to arrange a mortgage for you. When our services has terminated (hopefully successfully), we will delete your information within three months (if you not explicitly express a wish for us to keep your information on file).

However, invoice and contact information will be kept for a minimum of 6 years to comply with our legal obligations.

Your rights

You have the right to request:

- Access to the personal data we hold about you
- The correction of your data when incorrect, incomplete or out of date:
- That we stop using your personal data for direct marketing even if you have given consent for us to do so in the past;
- Withdrawal of your consent to process or store your personal information (provided we have no overriding legitimate interest, legal or contractual obligation to maintain these records for example you have an outstanding debt with us)

You have the right to request a copy of any information we hold about you or have that information corrected if inaccurate. To make such a request or to withdraw consent to us using your personal information please contact us.

Contact the **regulator in Spain**

If you feel that your data has not been handled correctly or if you are unhappy with our response to any requests you have made to us in relation to the use or accuracy of your personal information then you have the right to lodge a complaint with the Agencia Española de Protección de Datos (AEPD)

You can contact them by calling (+34) 901 100 099 or you can go online to www.aepd.es

What we use your Personal Information for	Our Reasons	Our Legitimate Interests
 To find mortgage offers for you To manage our relationship with you To develop and carry out marketing activities To identify the most appropriate products and services. 	 Your consent Fulfilling our contract to you Our legitimate interests Our legal duty 	 In order to keep our records and your mortgage application(s) up to date. Developing products and services. Seeking your consent when we need to contact you. In order to fulfil our legal duties.
Carry out a mortgage review to see viability and conditions of possible mortgage offers	Your consentFulfilling our contract to youOur legitimate interests	 Developing products and services. Seeking your consent when we need to contact you. In order to fulfil our legal duties.
To develop and manage our products and services.	Fulfilling our contract to you.Our legitimate interestsOur legal duty.	 Developing products and services Identifying members for new products and services. In order to fulfil our legal duties.
 To make and manage client payments, invoices and receipts. To collect and recover money that is owed to us. To obey laws and regulations that apply to us. To respond to and resolve complaints. 	Fulfilling our contract to you.Our legitimate interestsOur legal duty.	 In order to fulfil our legal duties. To comply with regulations that apply to us
 To run our business in a proper and efficient way. Including managing our financial position, business planning, communications and audit. 	Our legal duty.Our legitimate interests.	 In order to comply with regulations that apply to us. In order to efficiently fulfil our legal and contractual duties.

Company Information summary

CIF B54986682

Company Registration number

Registro mercantil Registro Mercantil de ALICANTE T 4028, F 117 Company Register

Legal name

Nombre legal Loanissimo S.L.U.

Nombre Comercial Bank in Spain Trading name

Domicilio social Av Balcón de Ponoig 12-33 03520 Polop (Alicante) Registered Address Spain

Dirección Oficina Calle Joaquín Rodrigo 6 03581 Albir - Alfaz del Pí (Alicante) Office Address Spain

Póliza de Responsabilidad Civil Professional indemnity insurance

Lloyds Insurance Company S.A BAS202000001

Tel: (+34) 961 04 38 38 Contacto mail@bankinspain.com Contact Details www.bankinspain.com

Trond G. Michelsen

757/2017

D201

Responsable LOPD Data Protection Officer

N° Registro AECOSAN Mortgage Broker Registration No

Nº Registro Banco de España Registration in Central Bank of Spain

BANCODE ESPAÑA



