



Rothschildco Privacy Policy IIS

1. Who is responsible for processing your personal data?

Rothschild & Co Wealth Management Spain, A.V., S.A. ("the " **Company** " and/or the " **Responsible** ") is responsible for the processing of personal data processed through the Internal Information System (hereinafter, the " **IIS** ").

The Company respects the fundamental rights and freedoms of individuals, including the fundamental right to the protection of personal data.

This policy provides information on the use that the Company will make of its personal data. If you are in any doubt about the processing of your personal data, contact the Company at the following address:

pierre-laurent.bel@ch.rothschildandco.com.

2. What do we treat your personal data for?

Your personal data is processed by the Company for (I) to carry out investigations of communications received under the IMS pursuant to Law 2/2023 and (II) to process and process the relevant files as a result of the communications received.

The personal data may be anonymised for statistical and reporting purposes within the Rothschild Group.

3. What categories of personal data do we process?

The categories of personal data we process for you depend on your condition in the submitted communication. The categories of data processed by different stakeholders are identified as follows:

- Informant (unless anonymous): The personal data provided in the communication shall be processed;
- Person concerned: Identification and contact data, personal characteristics, academic and professional data, employment details, economic, financial and insurance data and, potentially, specially protected data shall be processed;
- Witness: Identification data shall be processed.

In cases where interviews, meetings or communications are carried out by telephone or in recorded meetings, we may also treat the image or voice of the participants.

4. From what sources do we obtain your personal data?

The data of the informants are obtained from the communication presented in the IBS.

The data of the affected persons and witnesses are obtained from the communication presented in the IIS and during the investigation process conducted.

5. What is the standing for the processing of your personal data?

We will process your personal data on the legitimate basis of compliance with the legal obligations established in Law 2/2023.

In the event that specially protected data are processed (such as health data, sexual life data, trade union membership, political opinions, religious convictions, etc.), such data shall be treated, in addition to the fulfilment of the above mentioned legal obligations, on the basis that the processing of such personal data is necessary for the formulation or defence of claims by the Company or the entity to which the person complained belongs.

The anonymisation of personal data for the purposes indicated shall be carried out on the basis of the legitimate interest of the Data Controller in order to be able to make statistics on the use of the channel and to report internally any matters that may be necessary, without prejudice to the rights of the data subjects.

Persons who communicate via some of the IIS channels must ensure that the personal data provided is true, accurate, complete and up to date.

6. Which service providers will be able to access your personal data?

The providers of legal services, computer systems and technological tools of the Company may access their personal data during the provision of such services, although such data processing shall always be carried out under the guidelines of the Company and shall be returned or duly destroyed upon completion of the contracted service.

7. To which third parties will your personal data be transferred?

Your data may be transferred to the Public Prosecutor's Office for the fulfilment of the obligations established in Law 2/2023 or, if the submitted communication ends with the commencement of a judicial proceeding, your personal data will be transferred to the Judges and Courts on the legal basis of the legitimate interest of the Company linked to our right to effective judicial protection.

If, during the investigation process, it has become necessary to collect specially protected personal data, such data would be ceded, in addition to the legitimate interest of the Company, on the basis that the processing is necessary for the formulation or defence of claims.

8. Are there any international transfers of my personal data?

Your personal data will not be transferred internationally.

9. How long do we retain your personal data?

The data included in the communications and those derived from the investigation procedure will be kept during the processing of the file until the final decision is taken and may be kept duly blocked during the period of limitation of legal actions against the Company.

10. What are your rights?

We inform you that you have the following rights:

- Right of access to your personal data to know which data are being processed and the processing operations carried out with them;
- Right of rectification of any inaccurate personal data;
- Right to delete your personal data, where possible;
- Right to request the limitation of the processing of your personal data when the accuracy, legality or necessity of the processing of the data is doubtful, in which case we may retain the data for the exercise or defence of claims;
- Right of opposition to the processing of your personal data. The Company shall cease processing its data unless it has an overriding legitimate interest or in the formulation, exercise or defence of claims.

Without prejudice to the rights of any party, the data of the informant, if available, shall not be provided to any third party exercising the right of access.

He may exercise his rights at any time and free of charge by sending an e mail to the address:

WMSpain1@es.rothschildandco.com.

You can also contact the Company's Data Protection Officer at pierre-laurent.bel@ch.rothschildandco.com.

Finally, we inform you that you have the right to file a complaint with the Spanish Data Protection Agency if you consider that an infringement of the data protection legislation has been committed with regard to the processing of your personal data.