Telefónica

PRIVACY AND DATA PROTECTION POLICY

09-2025 Telefónica Factoring España, S.A.

I- INTRODUCTION

TELEFÓNICA FACTORING ESPAÑA,S.A. reserves the rights to amend this Policy to adapt it to any new legislation, case law and industry practice, and to the interests of Telefónica Factoring España, S.A. Any amendment hereof shall be announced sufficiently in advance, in order that you may be perfectly aware of its content.

In order to provide certain services, we need to process your personal data. For these purposes, they will be included in the relevant processing activities undertaken by TELEFÓNICA FACTORING ESPAÑA,S.A. and shall be processed only for the specific purpose of each processing action, mainly in accordance with the regulations set forth in 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 (General Data Protection Regulation) and Organic Act 3/2018, of December 5, on Personal Data Protection and ensuring digital rights (LOPD-GDD).

II - GENERAL INFORMATION

Below, TELEFÓNICA FACTORING ESPAÑA, S.A. provides general information on how it safeguards privacy and personal data protection as applied to the processing activities undertaken at Portal level, and by other means:

1. Who is Data Controller for your personal data?

Telefónica Factoring España,S.A. (with Tax ID CIF A28016798), is Data Controller, with registered office for the purposes hereof at Calle Zurbano, 76 8ª – 28010 Madrid.

Contact email: protecciondatos@telefonicafactoring.com

2. For what purposes do we process your personal data?

The purpose of the collection and processing of personal data, via the different forms provided by **TELEFÓNICA FACTORING ESPAÑA, S.A.**, made available to Users, is, depending on the specific case at hand, to process and attend to requests for information, queries, complaints, birthday congratulations suggestions concerning the publications or any services or activities, acts or events provided, offered, supported and/or sponsored by **TELEFÓNICA FACTORING ESPAÑA, S.A.**

3. What is the legal basis that allows the processing of your personal data? I.e., what entitles us to process your personal data?

The legal basis that legitimizes us for the processing of your personal data is, as the case may be, the following: (I) your consent granted by means of your signature or acceptance of the relevant forms, for one or several specific purposes, and (II) as the case may be, the execution of a contract of which you are a party, whether as contractor or as successful bidder.

4. For how long do we keep your personal data?

We will keep your personal data during the period necessary to keep a customer record and to manage our services efficiently, provided that the data subject does not request their erasure. Even after an erasure request, they will be blocked during the necessary period, and processing thereof shall be limited to the following cases: to meet legal/contractual obligations of any kind to which we may be subject and/or during the legal statute-barring period for any liability to which we may be subject and/or for the exercise of the defence of any claims resulting from our relationship with the data subject.

5. Who must update the personal data?

We will endeavour to keep the data included in our computer and/or hard copy files updated to ensure that they are always accurate. For these purposes, the User must introduce any changes directly, if authorised to do so, or give notice to the corresponding area or department of TELEFÓNICA FACTORING ESPAÑA, S.A. through official channels.

6. Who may be assignees or recipients of your personal data?

Your personal data shall not be assigned or communicated to third parties, save where necessary for the development, control of or compliance with the aforementioned purpose(s), in the cases set forth in the Law.

7. Security of the personal data

TELEFÓNICA FACTORING ESPAÑA,S.A. shall adopt in its information systems suitable technical and organisational measures, in compliance with the principle of proactive responsibility, to ensure the safety and confidentiality of the data, preventing their alteration, loss, unauthorised processing or access; taking into account the current state of technology, application costs, and the nature, scope, context and purposes of the data processing, and also the varying likelihood and seriousness of the risks associated to each kind of data processing.

8. What are your data protection rights and how can you exercise them?

You may exercise your rights of access, rectification, erasure, limitation, portability or, as the case may be, opposition. For these purposes, you must submit a request in writing to **TELEFÓNICA FACTORING ESPAÑA,S.A.**, Calle Zurbano, 76 8ª – 28010 Madrid. The request must specify which of these rights you are enforcing and, likewise, when required for your proper identification you must show or, if the request is sent by post, attach a copy of your National Identification Document (DNI) or equivalent identification document. If you should act through your legal or voluntary representative, he/she must also provide a document evidencing his/her representation and his/her identification document. Likewise, if you should consider that your personal data protection rights have been violated, you may bring a claim before the Spanish Data Protection Agency (www.aepd.es).

Below is further information regarding the exercise of your data protection rights:

a) What are my rights?

b) Who may exercise these rights against TELEFÓNICA FACTORING ESPAÑA,S.A.?

c) How and where can I exercise these rights?

d) Additional information

8.a) What are my rights?

Data protection regulations allow you to exercise rights of access, rectification, opposition, portability, erasure ("right to be forgotten"), limitation of processing and the right not to be subject to individualised decisions, TELEFÓNICA FACTORING ESPAÑA,S.A., in accordance 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 (General Data Protection Regulation, hereinafter "GDPR") and Organic Act 3/2018, of December 5, on Personal Data Protection and ensuring digital rights (LOPD-GDD):

8.a.1 RIGHT OF ACCESS

You have the right to be aware of the following:

- Whether or not we are processing personal data concerning you.
- The origin of your data, if you didn’t provide them.
- The purposes for which your data are processed.
- The data categories in question.
- The recipients or recipient categories to which your personal data were or will be communicated.
- If possible, the period during which your personal data will be kept (or, if not possible, the criteria used to determine this period).
- The right to lodge a claim before a supervisory authority.
- Whether or not we make automated decisions -including profiling- using your personal data.

8.a.2 RIGHT OF RECTIFICATION

You have the right to demand that yout personal data be rectified:

- By completing them, if they should be incomplete.
- By updating or rectifying them, if for any reason they should no longer correspond to the current situation or if they should be inaccurate.
- Upon exercise of your right of rectification, we will ensure that all your personal data are accurate and complete.

8.a.3 RIGHT OF ERASURE

You have the right to demand the erasure of your personal data in any of the following cases:

- The data are no longer necessary for the purposes for which they were collected or processed.
- You withdraw your consent which is the basis for the processing of your data and such processing cannot be performed on any other basis.
- You have successfully exercised your right of opposition to the processing of your data.
- Your personal data have been processed unlawfully.

8.a.4 RIGHT OF LIMITATION OF THE PROCESSING

You will be entitled to demand limitation of the processing of your personal data (i.e., for us to keep them without using them for the expected purposes).

8.a.5 RIGHT OF OPPOSITION

You will be entitled to demand that we cease to use your personal data, for example, where you believe that the personal data we have about you may be inaccurate, or if you should believe that we no longer need to use them.

8.a.6 RIGHT OF PORTABILITY

Where the processing of your data is based on your consent, or where it should be necessary for the performance of a contract or preliminary contract, and such processing should be performed by automated means, you will be entitled to the portability of your data, i.e., for them to be delivered to you in a structured, commonly used and mechanically readable format, even to forward them to a new data controller. For these purposes, the entity shall facilitate the portability of your data to the new data controller.

8.b) Who may exercise these rights against TELEFÓNICA FACTORING ESPAÑA,S.A.?

You, as data subject or as titleholder of the personal data, acting in your own name and behalf.

By means of another person acting as your legal representative, duly evidencing his/her representation (e.g., where the holders of parental authority or guardians act in the name of a person under 14 years of age, or when acting as legal representative of a functionally diverse person) or as voluntary representative (a person to whom you have freely and voluntarily granted a power of attorney for these purposes).

8.c) How and where can I exercise these rights?

By post You may submit a request in writing sent to the following postal address: **Calle Zurbano, 76 8ª – 28010 Madrid.**

By email You may submit your request by sending an email to the following address: **protecciondatos@telefonicafactoring.com**

In both cases, you must:

- Provide sufficient data and information to respond to the request. For these purposes, you may use the forms made available by the Spanish Data Protection Agency https://www.aepd.es/es/derechos-y-deberes/conoce-tus-derechos
- Sign the form by hand or, as the case may be, if you should have an officially recognised digital certificate, by electronic signature.
- Enclose or attach a photocopy of your National Identification Document (DNI), Passport, Foreigner Identification Number (NIE) or other equivalent identifying document. If you are acting on behalf of the third party, you must also include a copy of your DNI or equivalent identification document, and the document evidencing your representation of the data subject.
- Send the form and evidence of your identity to Telefónica Factoring España, S.A. by any of the aforementioned means.

8.d) Additional information

TELEFÓNICA FACTORING ESPAÑA,S.A. shall analyse whether or not the request is in accordance with the law. It will communicate its decision to the petitioner, proceeding in consequence: If it should find in favour of the request, it will adopt the requisite measures depending on the right that was exercised; if it should find against the petitioner, it will indicate any appeals the petitioner is entitled to bring legally. If the requests should be manifestly unfounded or excessive (e.g., repetitive), TELEFÓNICA FACTORING ESPAÑA, S.A. may: (i) charge a fee proportional to any administrative costs it has borne (ii) refuse to act.

For further information or clarification regarding your personal data protection rights you may send a request to the following email address protecciondatos@telefonicafactoring.com

III - ADDITIONAL DATA PROTECTION INFORMATION

1. Who is Data Controller for your personal data?

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2. For what purposes do we process your personal data?

The purpose of the collection and processing of the personal data, via email made available to the Users by TELEFÓNICA FACTORING ESPAÑA,S.A. and any documents sent by these means, is to attend and respond to, as the case may be, any requests for information or consultations, to maintain commercial or professional contacts and any relationships arisen as a result thereof, or to maintain, as the case may be, a contractual relationship.

3. What is the legal basis that allows the processing of your personal data? I.e., what entitles us to process your personal data?

The legal basis that allows us to process your personal data is as follows; (I) your consent granted upon contacting us, or by means of the signature or acceptance of the relevant forms, for one or several specific purposes, (II) our legitimate interest, in the event of defence against possible court claims and (III) as the case may be, the execution of a contract of which you are a party, whether as contractor or as successful bidder, or a pre-contractual relationship.

4. For how long do we keep your personal data?

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5. Who may be assignees or recipients of your personal data?

Your personal data shall not be assigned or communicated to third parties, save where necessary for the development, control of or compliance with the aforementioned purpose(s), in the cases set forth in the Law.

6. Security of the personal data

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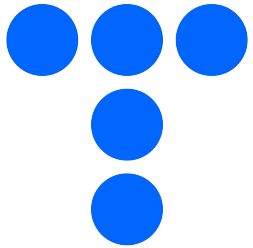
7. What are your data protection rights and how can you exercise them ?

You may exercise your rights of access, rectification, erasure, limitation, portability or, as the case may be, opposition. For these purposes, you must submit a request in writing to TELEFÓNICA FACTORING ESPAÑA, S.A., Calle Zurbano, 76 8ª – 28010 Madrid, or send an email to protecciondatos@telefonicafactoring.com. The request must specify which of these rights you are enforcing and, likewise, when required for your proper identification you must show or, if the request sent by post, attach a copy of your National Identification Document (DNI) or equivalent identification document. If you should act through your legal or voluntary representative, he/she must also provide a document evidencing his/her representation and his/her identification document. Likewise, if you should consider that your personal data protection rights have been violated, you may bring a claim before the Spanish Data Protection Agency (www.aepd.es).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