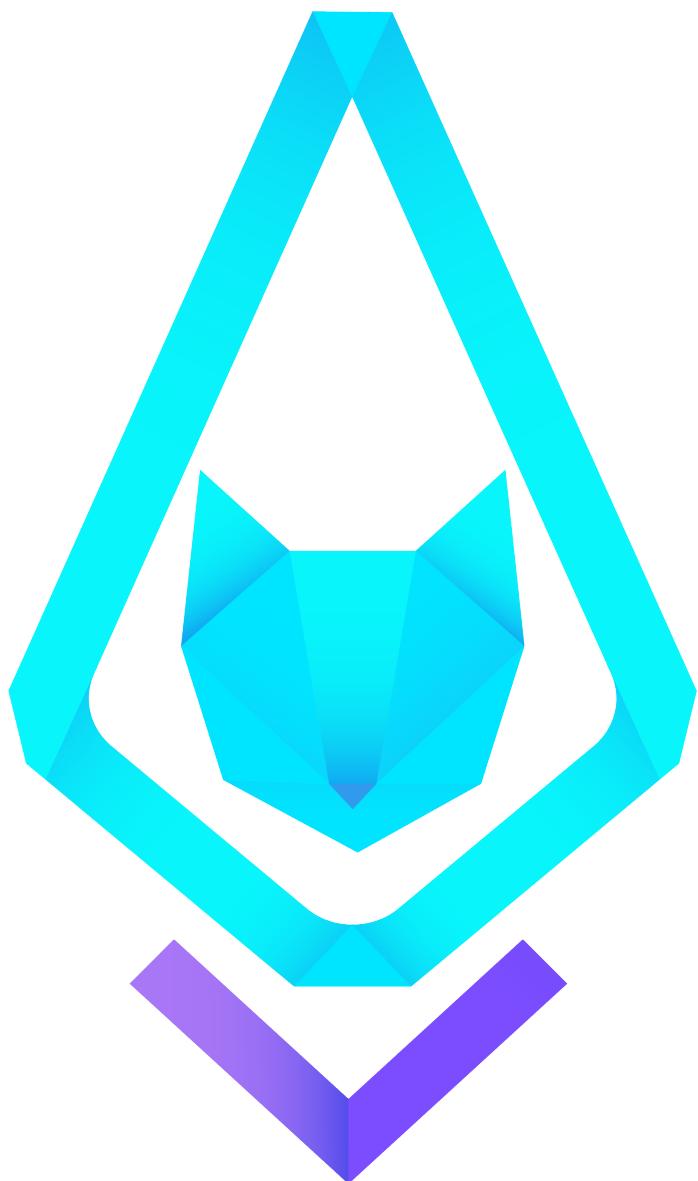


SAPHEER'S PRIVACY POLICY



1. Data Controller Information

Who is responsible for processing your data?

We recognize the importance of protecting the privacy of our customers' and users' personal information. This policy details how we collect, use, disclose, and protect the personal information provided by users of our services. It aims to regulate and provide information on the processing of personal data of current clients, potential clients, former clients, and third parties whose data we may process as a result of the relationships we establish with our clients.

The company is legally authorized to process the information provided by users of our website. The controller of personal data collected through our website is :

- Controller's Name: Sabrina Galliet
- Contact Email: dpo@sapheer.co

For any inquiries, questions, or to exercise rights related to the processing of personal data on our website, you can contact the responsible party through the provided contact methods.

2. Purpose of Processing

What is the purpose of processing your data?

The collected information is used to provide financial services, process transactions, prevent fraud, customize our clients' experience, and comply with legal obligations.

Personal data will be obtained through information request forms or through the contracting of our products or services. We may use the information to improve our services and send marketing communications with prior consent from clients.

Personal data collected through our website will be used for the following purposes:

- Provision of Financial Services: Data is collected to provide financial services, such as account opening, transaction management, requests for banking products, among others.
- Compliance with Legal Obligations: Data collection and processing are carried out to comply with applicable legal obligations and financial regulations.

- Client Management: Data will be used to maintain relationships with clients, including account management, communications related to financial services, and customer service.
- Fraud Prevention and Security: Data collection and processing are performed to prevent and detect potential frauds, ensuring the security of financial transactions.

The legal basis for processing personal data is based on the user's explicit consent. The relevant forms will include a checkbox for accepting the privacy policy as a requirement for registration or use of the services.

Personal data is obtained in accordance with legal regulations and with the explicit consent of the users. This information is provided to ensure transparency about the use and processing of personal data collected on our website.

3. Third-Party Recipients of Personal Data

Who do we share your personal data with?

We may share personal data with third-party recipients to provide and improve our services. These third parties may act as data processors. Situations in which data might be shared include, but are not limited to:

- Associated Financial Entities: We may share data with financial institutions to facilitate transactions, verify identities, or provide specific financial services.
- Public Authorities, Official Bodies or Bank Supervision and Control Entities and Competent Tax Authorities: We may disclose personal data as required by banking and financial sector regulation, anti-money laundering and terrorism financing regulation, as well as consumer protection laws in force.
- Notaries: In the case of mortgage contracting, we will communicate your data to Notaries as their intervention is necessary for formalization.
- Public Registries: Data will be sent to Public Registries (such as the Property Registry) when it is necessary to register the corresponding guarantees (mortgages).
- Service Providers: In certain circumstances, we contract external service providers, such as payment platforms, web analytics service providers, or fraud prevention services, who could access personal data in the course of their activities.
- Third-Party Cookies: Our website may use third-party cookies, which collect data to improve the user experience. These cookies are used by external providers and could record personal information, provided the user gives their consent.

Users have the option to manage cookie preferences through their browser settings, allowing or rejecting the use of third-party cookies on our website.

It is important to highlight that access to personal data by third-party recipients is subject to the explicit approval and consent of the user. This information is provided to ensure transparency in the handling of personal data on our website.

4. International Transfers

We commit to informing you transparently about any international data transfers that may occur. In some cases, personal data may be transferred outside of the countries that are part of the European Union.

These international transfers will occur in compliance with applicable data protection regulations. In particular, explicit and detailed notification will be provided about such transfers, ensuring compliance with applicable data protection laws.

It is important to note that these transfers could involve sending data to companies with servers located outside the European Union, such as those in the United States or other countries.

Our commitment is to ensure that, regardless of international transfers, your personal data's protection and privacy are maintained in accordance with corresponding data protection standards and regulations.

5. Data Retention Period

How long do we keep your data?

We commit to keeping the personal data provided by users only for the time necessary to fulfill the purposes for which they were collected, unless a legal or regulatory obligation requires a longer retention period.

The retention period for personal data may vary depending on the purpose of the processing and applicable legal obligations. Generally:

- Current Clients' Data: Data from current clients will be retained for the duration of the contractual relationship and, once concluded, will be blocked for 10 years as mandated by anti-money laundering regulations.
- Potential Clients and Former Clients' Data: Data from potential clients, as well as from former clients, will be retained for a reasonable period to maintain records and manage inquiries or complaints.

- Legal Compliance and Regulatory Obligations: In certain cases, information may be kept for an additional period to comply with legal obligations, respond to legal and regulatory requirements, resolve disputes, prevent fraud, or enforce agreements. Eventually, we will abide by the legal prescription periods depending on the specific contracts you sign with us, for example, 21 years according to mortgage regulations.

After the corresponding periods have passed or when the data are no longer necessary for the established purposes, data will be securely deleted in accordance with internal policies and current data protection regulations.

6. Rights of Access, Rectification, Opposition, and Cancellation

Our users have the right to exercise access, rectification, deletion, limitation, portability, and opposition rights regarding their personal data:

- Access and Rectification: You can access your personal data and, if necessary, rectify them if they are inaccurate or incomplete.
- Deletion: Under certain circumstances, you can request the deletion of your personal data.
- Processing Limitation: You have the right to request the limitation of the processing of your data in certain situations.
- Portability: You can request the transfer of your data to another data controller in a structured and readable format.
- Opposition: You can oppose the processing of your data, including processing for direct marketing purposes.

To exercise any of these rights, or if you wish to obtain more information about the processing of your personal data, you can contact us through the provided contact methods. We are committed to addressing your requests and inquiries related to your data protection rights to ensure respect and protection for your personal data.