

# 1. Identity of person responsible for the data

HIPOGES IBERIA, S.L. with registered address at C/Albacete nº3, 5ª planta (28027) Madrid, and with Tax Identification Code B85610228 (“HIPOGES”), is the owner and administrator of the domain name <https://realestate.hipoges.com/es> (the “Website”).

## 2. User acceptance and identification

By accessing and browsing through this Website, the User acknowledges having read and accepted our Privacy Policy and expressly accepts its application to the use made of the Website while browsing.

HIPOGES can offer, through the Web Site, services that may be subject to their own particular conditions, about which the Users will be informed in each specific case.

The User must always identify himself/herself with his/her personal e-mail address.

The User guarantees both to HIPOGES and to third parties, the quality of the information provided, that is to say, that the data and information provided are real, truthful, updated and also belong to the User and not to third parties. The User will be responsible for the veracity of the personal data provided and will hold HIPOGES harmless against third party claims or against sanctions or damages that could be suffered in case of non-compliance.

In accordance with the legislation in force in Spain, in order to use the Web Site, it will not be necessary to have the authorisation of the parents and/or guardians for the use of the Web Site of those users who are older than 14 years old. Therefore, by accepting this Privacy Policy, the User guarantees that he/she is older than this age or that he/she has the mentioned parental authorisation to register in HIPOGES, and is responsible for this declaration.

# 3. Purpose of the data processing

Provision of the services offered by Hipoges in the marketing of real estate assets.

By means of your request and interest in any of the properties we market, your personal data will be processed for:

1. Process your registration as an interested client and potential buyer;
2. to process your request for a visit to the property in which you are interested;
3. process the presentation of your offer for the property in which you are interested;
4. to process and respond to your doubts, queries or complaints;
5. to process your registration as a web user;
6. to process your request for contact to find out more details about the property you are interested in or to arrange a visit;
7. to process the presentation of your offer for the property you are interested in.

Communication of data to Public Bodies and Public Administrations in compliance with legal obligations.

Hipoges has to comply with the obligations established by the regulations on the Prevention of Money Laundering and Financing of Terrorism, which could involve the request of data to Public Bodies in order to verify the information provided, in the cases established by law.

Communication of data to the company that owns the property and to the rest of the companies in its Group.

Based on the execution of the contractual relationship, Hipoges may communicate your data to the company that owns the real estate asset in which you have shown interest, as well as to the rest of the companies belonging to its Group, with the aim of managing the marketing of said property carried out by Hipoges.

Sending you commercial communications about similar properties and Hipoges offers and promotions.

If you give your consent, Hipoges may send you segmented commercial information about the properties in which you have previously shown interest, as well as Hipoges offers and promotions that may be of interest to you, either directly or because they are related to the provision, improvement and updating of our services. At any time and free of charge, you may object to this purpose in order not to receive new commercial

information, offers and promotions, indicating this by post to the above address or by e-mail to the address [dpo@hipoges.com](mailto:dpo@hipoges.com). Likewise, in all communications, you will be able to exercise your right of access, rectification, cancellation and opposition.

Communication of data to other companies in the Hipoges Group, to third party companies that provide services related to the real estate sector and to Collaborating companies.

Hipoges may communicate your data to:

1. Other companies of the Hipoges Group that provide services related to the sectors related to the commercialisation of real estate assets, including their financing, promotion, titling and others of added value to the same.
2. Third party companies that provide services related to the sectors related to the commercialisation of real estate assets, including their financing, promotion, titling and others of added value to them.

The communication of your data will be carried out so that these companies can send you, directly and without the intermediation of Hipoges, offers and promotions related to their products and services, or manage with you, upon request, the marketing or provision of any of their products or services.

## 4. Legitimation

The legitimacy for the processing is the contractual relationship for the provision of the requested service, the legitimate interest in the maintenance of the existing relationship and/or, in certain cases (submission of applications), consent.

The processing of your data for the 'Sending of commercial communications' and 'Hipoges offers and promotions' is based on the consent given by the user in each case.

## 5. Duration

Hipoges will keep your personal data for the time necessary to provide the requested service and/or to achieve the intended purpose of processing.

Subsequently, provided that the user has not exercised their right to deletion, their data will be kept for the legal periods that may be applicable in each case, taking into account the type of data, as well as the purpose of the processing and, where appropriate, the time in which some type of liability may be demanded arising from the relationship between the user and Hipoges.

In the event that the regulations on the Prevention of Money Laundering and the Financing of Terrorism apply to the processing of your data, Hipoges is obliged to keep your personal data for a period of ten years.

## 6. Data reporting

HIPOGES will not communicate the data collected to third parties, except when strictly necessary to manage and maintain the relationship with HIPOGES or with the prior authorisation of the User.

HIPOGES will carry out international data transfers, where justified and always respecting the purpose for which the data has been transferred.

## 7. Security

In relation to the personal data collected, HIPOGES has adopted and will adopt the necessary technical and organisational measures to guarantee their protection and prevent their alteration, loss, processing and/or unauthorised access, taking into account the state of the art, the nature of the data stored and the risks to which they are exposed, complying at all times with the applicable regulations.

In particular, measures have been adopted to achieve the basic security objectives, such as confidentiality (limiting access to information by unauthorised persons), integrity (maintaining reliable and quality information) and availability (guaranteeing access to the information system on request by an authorised user).

## 8. User rights

Users have the right to exercise at any time, under the terms provided by the regulations in force at any time, the rights of access, rectification or deletion of data, as well as to request that the processing be limited, oppose the processing or request the portability of their data.

Likewise, Users may revoke the consent given at any time.

To exercise any of these rights, a written communication must be sent to HIPOGES, and it will only be necessary to provide a copy of the National Identity Card when the data controller has reasonable doubts as to the identity of the data subject. You may send such communication (a) by post to the attention of the Data Protection Delegate and to

the address indicated in the first section of this document, or (b) by sending an e-mail to the following address: [dpo@hipoges.com](mailto:dpo@hipoges.com).

You may contact our Data Protection Officer (a) by postal communication to the address indicated in the previous section of this document, or (b) by sending an e-mail to the following address: [dpo@hipoges.com](mailto:dpo@hipoges.com).

In addition, we inform you that you can always turn to the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)) to request protection or lodge a complaint in relation to the processing of your personal data.

## 9. Applicable Law and Jurisdiction

The relationship between HIPOGES and the User shall be governed by Spanish law.

Any dispute shall be submitted to the Courts and Tribunals of Madrid.