

THE X TRAVEL WALLET PRIVACY POLICY

1. INTRODUCTION

Ouro Reinvent, S.L. with offices in Avenida de Brasil, 29, 28020, Madrid, Spain, and NIF B56873391 (“Ouro”) and Bnext Electronic Issuer E.D.E, S.L. (“Bnext”), with offices in Zurbano 71, 28010, Madrid, and NIF B88463534 (Ouro and Bnext will be jointly referred to as “we” or “us”) are committed to protecting your privacy and safeguarding your information.

This Privacy Policy describes how and why we may obtain, use, store and process your Personal Data, as joint Data Controllers. This Privacy Policy applies to your use of the Card, the Website, the Mobile App, the Watch App, the Account Centre and/or related services.

Please read this Privacy Policy in conjunction with the applicable program General Terms and Conditions (the “**Agreement**”).

Terms not defined in this Privacy Policy shall have the same meaning as assigned to them in the Agreement or in the General Data Protection Regulation 2016/679.

Ouro and Bnext have signed the corresponding Joint Data Controller Agreement. This means that we jointly determine the purposes and means of processing, so that the Personal Data you provide will be processed by both parties in order to correctly provide the services.

2. WHAT IS PERSONAL DATA?

Personal Data is any information concerning a natural person who is, or can be, identified either directly or indirectly from information provided to us or from information provided to us in conjunction with other information that is in, or is likely to come into, our possession.

3. WHAT INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

We will always ensure that your Personal Data is obtained fairly. We will collect and process the following Personal Data:

- **Information you provide us.** This includes the information that you provide to us to: (a) activate your Account, (b) download, register to use and utilise the Website, Mobile App or Watch App (c) make any transaction, (d) receive customer service or make postings on social media that are part of the Account and Card, and (e) participate in any promotion, survey or competition.

This information will include your name and surname, physical address, email address, password and card pins, birthdate, phone number, copies of identity documents and their respective numbers, bank account information as well as details of your credit card or debit card, security questions, and other information that we may request to establish your identity, determine your eligibility to use the card or provide you with the services.

- **Information that we automatically obtain about you and the devices you use whenever you use the Card or Account.** We may automatically collect additional information whenever you access or use the Card or Account such as:

- your IP address, device information, time and duration of access, location of access, information about the browser used to access your Account, and the items that you click through as you use the Card Website, the Mobile App or Watch App;
 - information related to your transactions such as the amount, time, date, location, currency, exchange rate, identification of the merchant or ATM or bank branch, the Card or device used to make the transaction, information related to the payee or recipient of funds, information related to the origin of funds.
- **Information that we may collect from third parties.** We work with third parties to provide you with the Card and Account services. These third parties may provide us information to establish your identity and eligibility for the program, provide customer service, optimise your program experience, detect potential fraud and comply with regulatory obligations.

As part of the program services, we may use Cookies. Cookies are small text files that are placed on your computer by websites that you visit and which enable websites to work more efficiently and to collect information about usage. Our cookies will not be used to analyse your visits to other sites. Our agents, who assist in the serving and targeting of advertisements, promotions and other marketing messages may use cookies to collect anonymous data such as how many people have viewed a particular page each day. Data collected by cookies will not otherwise be passed to any third party.

We use the following Cookies:

Google Analytics

- Persistent cookie: Provides us aggregated data around usage and web traffic. You can opt out of tracking by Google Analytics by visiting: <http://tools.google.com/dlpage/gaoptout>. The information collected does not include personal data.

Mixpanel

- Persistent cookie: Provides us aggregated data around usage and web traffic. You can opt out of Mixpanel tracking by visiting: <https://mixpanel.com/optout/>
- Essential cookies: Session cookie to authenticate users and prevent fraudulent use of user accounts. We also use these cookies to establish and control a session so we can identify if you are logged out. The session cookie is refreshed every time the user logs in and cleared upon logout. The session ID expires in 15 minutes.

We also use local storage to store locale, username and restful-authenticated information which is used to identify if you are logged in. This Local storage lasts only for the duration of your session and is cleared when you log out.

We may also use Web Beacons which is a small graphic image that informs us whether you have opened the emails or messages sent to you.

We do not use cookies for advertising purposes and we will not share your information with any other party not listed in Section 5 without your consent.

Your browser may allow you to disable existing cookies, block cookies automatically or notify you if you are receiving a cookie. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

4. WHY DO WE COLLECT PERSONAL DATA?

We collect information about you to administer the program service, to process transactions carried out using the service, to perform routine account maintenance, and to optimise the program.

In this context, your Personal Data may be used for various purposes, including:

- Supplying products and services that you have ordered/requested, including services that may display custom content and advertising, due to our contractual relationship and our legitimate interest to conduct direct marketing to our clients;
- Informing you of any service-related message that may be relevant to the program services provided to you, since we are required to do so or have legitimate interest;
- Verifying that you are an authorised user for security purposes, as established in the corresponding regulations;
- Complying with our legal and regulatory obligations and assisting us with money laundering, terrorist financing, crime and fraud prevention (e.g., by checking your identity);
- Assisting you with any product or service enquiries, complaints or issues that may arise, as a part of our contractual relationship;
- Analysing market and product reports, performing research and statistical analysis, and monitoring usage behaviour to improve our technologies and services, in our legitimate interest to analyse our client's behaviour, respecting their data protection rights. This information will be used as aggregate data, so that no personal profiling will be performed with this purpose;
- Marketing our products and services generally, in compliance with law, due to our legitimate interest to show you our products and services or due to your consent, unless you oppose;
- Informing you of any products and services offered by other companies that we think may be of interest to you, provided that you choose to receive this information by giving your specific consent;
- Performing debt recovery and credit management, including making decisions about credit as a part of our contractual relationship in compliance with law.

You have the opportunity to be sent information about related products and services by electronic mail or SMS from us and carefully selected third parties, for the purposes listed above. If you do not wish to receive such electronic mail or SMS, you may indicate so when you activate your Account. You also have the opportunity to opt out of receiving such messages by phoning Cardholder Services.

5. WHO WE DISCLOSE IT TO?

We may disclose your Personal Data to third parties as follows:

- to the affiliated payment processor, the card scheme and other third parties to process your transactions;
- to affiliates or service providers that assist us to provide you the program services;

- to affiliates, service providers and government entities with competent jurisdiction in order to comply with legal requirements (such as verifying your identity and complying with money laundering and counter-terrorism financing laws), to prevent, detect and remediate fraudulent transactions, and to investigate and remediate breaches of the program Terms and Conditions;
- to a person or entity indicated in a court order or legal or administrative process at a regulatory entity;
- to analytics and optimizer services that enable us to improve our program Website, Mobile App or WatchApp;
- to auditors pursuant to contractual or legally mandated audits of our systems and processes;
- to investors or acquirors of Ouro or Bnext pursuant to an investment in the company or the sale of the company or its assets; and
- to any third party for any other purpose which we disclose to you when you provide the information.

All these data disclosures will be performed in compliance with the applicable laws, to service providers who need to process the data in order to provide us the services, or to other entities in case it is legally required by the applicable regulations. We will only disclose the minimum necessary data for each purpose.

We will only pass on information about you as an individual to third parties located outside of the European Union in compliance with European Union or Member State Law, taking into account the provisions of article 48 of the GDPR.

If you provide your consent, we may send you emails or other communications providing program updates or information about the program products/and services, including promotional offers relating to the program or from third parties. If you wish to unsubscribe, simply do so by selecting the unsubscribe link at the bottom of the email. We highlight that you are not able to unsubscribe from certain emails and communications that relate to the management of your account, including your transactions, account verification requests, or communications that are of a legal or technical nature.

Please take into account that the program website incorporates links to third party websites or services that are not governed by this Privacy Policy. We are not responsible for these parties' privacy practices.

6. DATA PROTECTION

Ouro and Bnext are registered in Spain with the Spanish Data Protection Agency and is subject to the Spanish Data Protection Organic Law 3/2018.

Ouro and Bnext complies with the General Data Protection Regulation (EU) 2016/679 to the fullest extent applicable.

You can contact Ouro's and Bnext's Data Privacy Officer at: dpo@bnext.es.

7. RETENTION OF INFORMATION

Note that the retention period for Personal Data is subject to change as required by applicable law.

- Cookies are stored on a per-session basis to aid your navigation of the Website. Persistent cookies may be set to store display-related preferences. Depending on your browser, you may also be able to control cookie use by altering your browser settings.
- We will retain Personal Data and transaction information during different periods, depending on the corresponding liabilities arising from each processing. Your Personal Data and transaction information may be kept up to thirteen (13) years from the date your account is closed, only in those cases where it is required by applicable law.

You will have the right to delete your personal data at any time. This right shall not be applicable in the following cases:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; or
- c) for the establishment, exercise or defence of legal claims.

In this sense, please note that the deletion of your personal data may imply that you cannot use your Card or Account any longer.

8. SECURITY

We have strict standards of security and confidentiality. We provide you a password to access certain program services. Please do not share your password with anybody and please note that you are responsible for maintaining it confidential.

We use current technologies and business strategies and have implemented security systems and procedures to protect the integrity and privacy of your Personal Data. Although we will endeavour to protect your Personal Data from unauthorised access, disclosure, use or modification, we cannot guarantee its security or integrity. The transmission of Personal Data from you to us is at your own risk. Passwords will be stored encrypted.

We limit the use of your Personal Data to those employees, agents or contractors who we believe have a legitimate business purpose to access your Personal Data. We maintain physical, electronic and procedural safeguards that comply with or exceed best practice standards to keep your Personal Data safe. We require companies working for us to protect your Personal Data and use it only to provide the services we ask them to perform for us.

9. PHISHING

You may receive electronic communications claiming to be from us with a link to what appears to be our website, where you are prompted to enter your Personal Data and/or account details – a so-called “phishing” attempt. We will never send you any communication that requests you to provide your Personal Data or account information (e.g., Card number or PIN) via a reply or link in an electronic communication.

If you think you have received a fraudulent communication that looks like it is from us, please forward the entire email including the header and footer to dpo@bnext.es and then delete it immediately.

10. AUTOMATED DECISIONS

Parts of the program website may automatically process your Personal Data for account administration, transaction monitoring, and billing purposes. Your Personal Data is not used to make automated decisions concerning credit or any legally binding decisions.

11. QUESTIONS & ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

You have the right to make questions or comments about this Privacy Policy, including the possibility of requesting a copy of any Personal Data that we hold about you as a Cardholder, and to have inaccuracies in that information corrected.

If you wish to make an access request you should follow the procedure below: Apply in writing to the Data Protection Officer at arco@bnext.es.

- Your application should be marked "Data Access Request".
- You should include as much detail as possible in order to help us identify you and locate all the Personal Data that we may hold (including names, addresses, date of birth, email address, mobile telephone number, etc.).

We will take all reasonable steps to verify your identity before issuing your data. While we will provide the information free of charge, we may charge a reasonable fee for unfounded or excessive requests to cover our costs for processing each request. We will provide you the information within 1 month from the date of your request, but we may incur delays in responding to complex or numerous requests.

You also have the right to have any inaccurate information rectified or erased, to have Personal Data taken off a direct marketing or direct mailing list, the rights to restriction of processing, to data portability, to object, and the right to complain to the Data Protection Authorities (www.aepd.es or the corresponding authority depending on the country). Should you discover that we hold inaccurate information about you, you may instruct us to correct that information. Your instruction must be in writing to the address outlined above. Your request will be dealt with as soon as practicable.

12. UPDATES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time and will always have the latest version available on the Website. As applicable, we will provide you notice of the changes via email, electronic communication or via the Account Centre.