

# Denizen Website Personal Data Protection Policy

Last updated: [August 2018](#)

## What is the purpose of this Personal Data Protection Policy?

This Personal Data Protection Policy ("Personal Data Protection Policy") applies to your interaction with BBVA and Denizen Financial, Inc. (collectively, for purposes of administering the Denizen website, "Denizen," "we," "us," "our") by using the Denizen website ("Website") and seeks to make you aware of how we collect, process and protect the personal data you provide or collect through the Website by means of forms and/or cookies.

When you contract products or services with Denizen the personal data will be processed in accordance with the provisions of the corresponding document.

Other privacy policies may also apply in addition to the terms of this Personal Data Protection Policy in connection with your use of a particular product or relationship with a specific business. In those cases, please note that BBVA and Denizen are not responsible for the content of other privacy policies.

The Website is owned by Denizen Financial Inc. You can read the information related to BBVA and Denizen Financial Inc. in our [Legal Notice](#).

All the capitalized words or phrases in this Personal Data Protection Policy will have the meaning that has been given to them in the [User Agreement for Denizen Service](#), unless a specific different meaning has been provided here.

This Personal Data Protection Policy is part of the Terms and Conditions that regulates the use of the Website. By accessing and using the Website, you fully accept and agree to comply with this Personal Data Protection Policy. This Personal Data Protection Policy may be amended from time to time. Any updates to the Personal Data Protection Policy become effective when we post the updates on the Website. Your use of the Website following an update to this Personal Data Protection Policy means that you accept the updated Personal Data Protection Policy. BBVA and Denizen reserve the right to update, modify or eliminate these Terms and Conditions of the Website.

This Policy applies only to the Personal Information collected in this Website and is not applicable to other information gathered by third parties in other apps or websites, even if such apps or websites are linked in this Site.

## Who is controller of the processing of your Personal Information?

We inform you that the Personal Information collected through any Personal Information collection forms contained in this Website, Your browsing through the Website, or otherwise will be included in a Personal Information filing system owned by BBVA (if you are an EU user), with registered office in Plaza San Nicolas 4, 48005 Bilbao (Vizcaya) (Spain) and email address [support@denizen.io](mailto:support@denizen.io) and by Denizen Financial, Inc. (if you are a U.S. user), with its principal office at 201 Mission Street, Suite 2400, San Francisco, CA 94105, USA and email address [support@denizen.io](mailto:support@denizen.io) and will be used to manage your

access to the Website, you browsing of the Website as well as for the purposes specified in each of the Personal Information collection forms included in the Website.

We maintain the confidentiality of Your Personal Information and we also maintain compliance with all laws and regulations applicable to such Personal Information.

So that the information provided by You is always updated and contains no errors, You must notify Us of any changes and/or corrections of Your Personal Information as soon as they occur.

When clicking on "Send," or equivalent button, on the aforementioned data collection forms, You declare that the Personal information provided is accurate and truthful.

### **How can you contact the BBVA and Denizen Data Protection Officer?**

If you are a resident of the European Union or an individual otherwise subject to the European Union data protection law, you can contact the BBVA and Denizen Data Protection Officer by sending an email to the following email address: [dpogrupobbva@bbva.com](mailto:dpogrupobbva@bbva.com).

### **What do we use your personal data for?**

- To manage your browsing through the Website in accordance with the [Cookies Policy](#).
- For the purposes and legitimized purposes indicated on each of the personal data collection forms on the Website.

We treat your personal data confidentially. We undertake not to disclose such data and guarantee our duty to safeguard them by adopting all necessary measures to avoid their alteration, loss and unauthorized processing or access, in accordance with the legal obligations that apply to us as being responsible for the processing of your personal data.

Denizen has put in place and maintains security as required by law to protect your personal data against incidental loss and access and unauthorized processing or disclosure, in consideration of the state of technology, the nature of the data stored and the risks they are exposed to. You can read Denizen's Security policy [here](#).

In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Website, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing (provided you consent) or personalizing the presentation of our products and services to you; tracking website usage.

When permitted or required by law, we may share information with additional third parties for other purposes, including response to legal process.

### **What information does the Website obtain and how is it used?**

You may interact with us in a variety of ways online, including through a PC, tablet, or mobile device. We may offer sites that permit browsing and do not require registration. We may also offer the ability to access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, last name, e-mail address, other contact information.

We may also gather additional information such as the type of device and browser you are using, the Internet protocol (IP) address of your device, information about your device's operating system, and additional information associated with your device. We may also gather information collected through cookies, tags, and other technologies, as described further below. The purpose of this collection is to measure the traffic through the website for analytics.

#### **Will Denizen send you commercial communications?**

Through the data collection forms Denizen may obtain your consent to contact you by post, e-mail, SMS, or any other equivalent electronic means of communication, to send you commercial communications about their own products and/or third parties identified in the form.

If at any time you do not wish to continue receiving these kind of communications, you may revoke your consent by sending notification to the following address [support@denizen.io](mailto:support@denizen.io) providing a copy of a document that allows proof of identity, or using the link provided for this purpose in the commercial communications you receive.

#### **How long will we keep your data?**

During the time specified in the form that, if applicable, we provide you with to give your personal data to Denizen, as well as the period of time indicated in the Cookies Policy, and in accordance with applicable law and our policies.

#### **To whom will we communicate your data?**

We will not pass on your personal data to third parties unless we are required to do so by law or as required in response to lawful requests by public authorities or you provide your consent.

When your consent is required to communicate your personal data to third parties, we will inform you in the data collection forms of the purpose of the processing, the data to be communicated as well as the identity or areas of activity of the possible assignees of your personal data.

In order to provide you with a suitable service and manage the relationship we maintain with you as a customer, in Appendix 1 you will find a list of categories of companies that process your data on behalf of Denizen, as part of service provision agreements with them. You may also view the Cookies Policy for third parties that receive personal data through cookies from this Website.

Furthermore, we would like to inform you that, for the same purpose as indicated in the previous paragraph, certain companies that provide services to Denizen may have access to your personal data (international data transfers). These transfers are made to countries with a level of protection comparable to that of the European Union (suitability decisions made by the European Commission, standard contractual clauses and certification mechanisms). For more information, please contact BBVA's Data Protection Officer at the following e-mail address: [dpogrupobbva@bbva.com](mailto:dpogrupobbva@bbva.com).

### **Does Denizen use cookies on this Website?**

We use a technology called "cookies" on our Website. For more detailed information on how Denizen uses cookies, please view the [Cookies Policy here](#).

### **Do Not Track**

Do Not Track ("DNT") is a privacy preference that users can set in recent versions of most major web browsers, including Firefox 5+, Internet Explorer 9+, Safari 5.1+, and Chrome. DNT allows users to inform web services that they do not want certain information about their webpage visits collected across websites.

In accordance with this Personal Data Protection Policy, if you are a US user, we and our service providers and/or third-party analytics companies may (provided you consent) collect certain personally identifiable information ("PII") about your online activities over time and across third party websites or online services. As provided above and in the Cookies Policy, we might use this information for marketing purposes. We may also use such information for our internal product development or research purposes. We do not respond to DNT signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about the consumer acting over time and across third party websites or services.

### **Does Denizen use links to other websites?**

The Website may contain links to other websites. Please note that Denizen is not responsible for the privacy and processing of personal data from other websites. This Personal Data Protection Policy document applies exclusively to the information collected on the Website by Denizen. We recommend that you read the personal data processing policies of other websites to which you link from our Website or otherwise visit. You can also obtain information on our links policy in our Legal Notice here.

### **Can children use the Website?**

We do not use our Website to knowingly collect data from or market to children under the age of 13. If a child under 13 has provided us with personal information without parental or guardian consent, the parent or guardian may contact us at [support@denizen.io](mailto:support@denizen.io). We will delete such information from our files within a reasonable time and unsubscribe the child from any promotional contact opportunities.

### **Policy Updates and Effective Date**

We reserve the right to modify this Policy at any time and without prior notice. If we make updates to this Policy, We will inform You regarding the updated Policy and we will update the Policy with the changes and revise the "Effective Date" posted at the top of this Policy. Any updates to the Policy become effective when we post the updates on the Site. You may also visit <http://www.denizen.io> to view the current copy of this Policy. Your use of the Site following an update to this Policy means that you accept the updated Policy.

### **What are your rights when you provide us with your details?**

If you are a resident of the European Union or an individual otherwise subject to the European Union data protection law, the following provisions apply to you:

RIGHT	CONTENT	CARE CHANNELS
<b>Access</b>	You will be able to consult your personal data included in our files	<a href="mailto:support@denizen.io">support@denizen.io</a>
<b>Correction</b>	You can modify your personal data when they are inaccurate	
<b>Suppression</b>	You may request your personal data be deleted	
<b>Opposition</b>	You may request that your personal data not be processed	
<b>Limitation of processing<sup>1</sup></b>	<p>You can request a limitation on the processing of your data in the following cases:</p> <ul style="list-style-type: none"> <li>• While the dispute over the accuracy of your data is being checked</li> <li>• When the processing is illegal, but you object to your data being erased</li> <li>• When Denizen does not need to process your data but you need it to exercise or defend claims</li> <li>• When you have objected to your data being processed to undertake a task in the public interest or to satisfy a legitimate interest, while checking whether legitimate reasons for processing prevail over your own</li> </ul>	
<b>Portability<sup>1</sup></b>	You will be able to receive, in electronic format, the personal data you have provided to us, as well as to transmit them to another entity.	

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<sup>1</sup> Available from May 25, 2018

If you believe that we have not processed your personal data in accordance with the regulations, you can contact the Data Protection Officer at the following address: [dpogrupobbva@bbva.com](mailto:dpogrupobbva@bbva.com)

Nevertheless, you are entitled to submit a complaint to the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es))

**To exercise your rights, attach a copy of your ID card or equivalent document accrediting your identity to your application.**

These rights can be exercised at no cost.

Likewise, at any time, you can withdraw your consent without affecting the lawfulness of the processing by sending your request to the email address [support@denizen.io](mailto:support@denizen.io). Remember to attach a copy of your ID card or equivalent document accrediting your identity to your application.

## **APPENDIX 1**

### **INFORMATION ABOUT THE CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

- Data processing services.
- Other ancillary activities to financial services.