



VIRTUO Privacy Policy

This Privacy Policy (hereinafter, the "Privacy Policy") of CHEQUE MOTIVA, S.L., with Tax Identification Number B-84391929, and registered office at Calle Alcalá 106, 1st floor, Madrid (hereinafter, "CHEQUE MOTIVA" or "we"), applies to all personal data of users registered (hereinafter, the "Users") on the website <https://e-virtuo.com> (hereinafter, the "Web").

We respect your privacy and are committed to processing and storing your Personal Data securely, as well as to managing it in accordance with our legal obligations under the provisions of the General Data Protection Regulation (EU) Regulation (EU) 2016/679 ("GDPR"), Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights ("LOPD") and any other concordant regulations on data protection or that may modify or replace them in the future.

Without your consent to the processing of your Personal Data, it would not be possible to comply with the purpose of the contractual relationship that determines your registration as a User [art. 6.1.b) of Regulation (EU) 2016/679] or to respond to your request made through said registration [art. 6.1.a) of Regulation (EU) 2016/679].

Please read this Privacy Policy carefully as it contains important information to help you understand our practice with respect to personal information that you provide to us or that we otherwise collect in the context of the Site ("Personal Data").

Who is the Data Controller of your Personal Data?

CHEQUE MOTIVA is the Data Controller of the Personal Data provided on the Website and without which it would not be possible to comply with the purpose of the contractual relationship that determines that you are registered as a User on the Website [art. 6.1.b) of Regulation (EU) 2016/679] or to respond to your request made through said registry [art. 6.1.a) of Regulation (EU) 2016/679].

If you have any queries or complaints regarding this Privacy Policy, please contact us by sending an email to protecciondedatos@chequemotiva.com indicating the reference "VIRTUO CARDS".

For what purpose do we process your Personal Data and for how long do we keep it?

CHEQUE MOTIVA collects and processes Personal Identification and Contact Data of Users (name, surname, telephone number, email address, date of birth, nationality and DNI/NIE) under the legitimacy and legal basis of this consent and of executing the contractual relationship that is created on the occasion of the request and acquisition of Virtual Cards by Users.



The Personal Data that we request from you is adequate, pertinent and strictly necessary to be able to respond to your request to obtain the Virtual Card and in no case is it obliged to provide them to us. Therefore, the provision of Personal Data is voluntary, although its non-delivery would make it impossible to comply with the obligations that apply to us. You also assure us that all the Personal Data you provide to us is true, truthful, relevant and up-to-date for the purpose for which we request it.

Thus, at CHEQUE MOTIVA we process the Personal Data that you provide us with for the following purposes and during the periods that are also identified below:

1. To manage their participation in the Website and thus, the application and acquisition of Virtual Cards by Users. In relation to this purpose, your data will be kept for the minimum time necessary for such purposes.
2. Customer service. We process your Personal Identification and Contact Data to respond to questions or respond to complaints that, if any, you make to us in relation to your request for Virtual Cards. We record your requests, your questions, our responses and other procedures to manage your request. The basis that legitimises this processing will be our legitimate interest in processing your Personal Data in order to respond to your request. We will retain all information for a maximum period of five years after your inquiry or complaint has been resolved.
3. Maintenance and optimization of the website. Your Personal Data will also be used for the maintenance and analysis of our Site in order to resolve performance issues, improve availability, and protect the Site against fraud. Our use of your Personal Data for these purposes is necessary in our own legitimate interests and will also be retained for a maximum period of five years.

The use of your Personal Data for these purposes is based on your explicit consent. We will stop using your Personal Data for these purposes once you have opted out of receiving marketing communications from us, or where you have not interacted with the communications sent, within five years, except where we are required by law to keep such Personal Data or where it is required to be retained for any other legitimate purpose.

To whom will your Personal Data be disclosed?

CHEQUE MOTIVA informs you that the Personal Data will be treated with the utmost care by all our staff.

We will not disclose your Personal Data to any third party, with the following exceptions:

- i) other companies that, such as CHEQUE MOTIVA, belong to the 014 Group, due to administrative purposes, in order to store the Personal Data processed through the Website by means of shared computer systems, we will not communicate your data to any third party.
- ii) the company PECUNIA CARDS EDE, S.L. (hereinafter, PECUNPAY), registered in the Mercantile Registry of Madrid, Volume 43345, Folio 58, H.B, Entry 1, with registration in the Bank of Spain 6707; with NIF B86972346, and which has its registered office at Calle Guzmán el Bueno nº 133, Edificio América, Bajo B, 28003, Madrid, which is the entity that provides us with the Virtual Cards that you request through your registration as a User on the Website.

We may also need to provide Personal Data to law enforcement agencies in order to comply with any legal obligation or court order.

What are your rights when you provide us with your Personal Data?

The rights of which Users are entitled are those recognized in the LOPD and in the GDPR, they are the rights of access, rectification, deletion, limitation of processing, opposition and data portability.

- The right to request access, rectification (in case they are incorrect) or deletion of the Personal Data provided.
- The right to request the limitation of their processing, in which case they will only be kept for the exercise or defence of claims.
- Right to object to processing: CHQUE MOTIVA will stop processing Personal Data in the manner you indicate, unless for compelling legitimate reasons or the exercise or defence of possible claims they have to continue to be processed.
- Right to portability of Personal Data: in the event that you want your data to be processed by another company, CHEQUE MOTIVA will provide the portability of your data to the new controller.
- Right to withdraw consent to the processing of your Personal Data: You have the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent prior to its withdrawal.

To exercise the aforementioned rights, you can contact us by contacting CHQUE MOTIVA, S.L., at Calle Alcalá, nº 106. Planta 3ª, C.P. 28009, Madrid, or to the following email address: protecciondedatos@chequemotiva.com, attaching a copy of their ID card or documentation proving their identity.



Please note that requests that do not meet the requirements established by applicable law will have to be resubmitted and may sometimes be denied in accordance with applicable data protection regulations or any other regulations that may be applicable.

Finally, if you wish to provide more information about your rights in terms of data protection or need to file a complaint, you may contact the Spanish Data Protection Agency, with registered office at Calle Jorge Juan, 6, 28001, Madrid or at the address www.aepd.es in order to safeguard your rights.

Security and updating of your personal data

In order to safeguard the security of your Personal Data, we inform you that CHEQUE MOTIVA has adopted and will adopt all the technical and organisational measures that are necessary to guarantee the security of the Personal Data provided in order to prevent its alteration, loss, and/or unauthorised processing or access, as required by the regulations, taking into account the state of technology, the nature of the data provided and the risks to which they are exposed.

However, we must inform you that internet security measures are not completely insurmountable and therefore no internet site can be 100% secure. Therefore, CHEQUE MOTIVA cannot be held responsible for unauthorised or unintentional access that is beyond our control.

The Website contains links to other websites, such as:

- Apple Pay - Apple (UK) and Google Wallet - Apps on Google Play, so that users can download these apps on their mobile devices and install the Virtuo Card in their virtual wallet.
- A Virtuo - Home (virtuohub.io), so that users can check the balance of the card at any time.

We are not responsible for the privacy, content, or security practices used by those other websites, which will not comply with this Privacy Policy. We advise you to always carefully read the privacy policies of any website outside of CHEQUE MOTIVA.

Children's Privacy

The Website is not intended for use by minors under 18 years of age, so if you are a minor, you are not authorised to browse and use the Website. We do not collect Personal Data from individuals under the age of 18.



Changes to the Privacy Policy

CHEQUE MOTIVA reserves the right to update or modify the terms of its privacy policy at any time and without prior notice due to changes in legislation or at its own discretion. Modifications will apply only to information collected after its effective publication.