



viroque energy

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**PRIVACY NOTICE FOR
SUPPLIERS, CLIENTS,
COUNTERPARTIES AND
PROSPECTIVE CLIENTS**

www.viroqueenergy.com



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1. PURPOSE OF THIS NOTICE

This Privacy Notice describes how Viroque Group companies¹ collect and use personal data about you in the context of our commercial relationship, in accordance with Regulation (EU) 2016/679 (GDPR) and Organic Law 3/2018 (LOPDGDD).²

This notice applies to all suppliers, clients, counterparties and prospective clients. It also describes your data protection rights, including the right to object to certain types of processing (see section 13).

This notice is independent of the Privacy Policy of www.viroqueenergy.com, which governs the processing of data derived from browsing and use of the website.

2. DATA CONTROLLER

The Data Controller is the Viroque Group company with which you maintain the corresponding commercial relationship. To find out the exact company name and contact details of the controller, please refer to the contract signed with the relevant Viroque Group company. In the absence of a contract, the controller will be the company whose representative has contacted you.

| Privacy contact: rgpd@viroqueenergy.com

3. DATA PROTECTION PRINCIPLES

Viroque Group will comply with data protection regulations. This means that personal data we hold must be:

- processed lawfully, fairly and transparently,
- collected only for valid purposes that we have clearly explained to you, and not used in a way that is incompatible with those purposes,
- relevant and limited to what is strictly necessary in relation to the purposes for which it is processed,
- accurate and kept up to date,
- retained only for as long as necessary for the stated purposes, and
- processed in a way that ensures its security, integrity and confidentiality.



4. PERSONAL DATA WE MAY COLLECT

We may collect and process the following categories of personal data:

Category	Detail
Identification data	Full name, company name, position, national ID/passport, date and place of birth, nationality.
Contact data	Postal address, email address, telephone number.
Financial data	Bank details (IBAN, institution), solvency, turnover, tax data (tax ID, VAT number).
Communication records	Content of communications held with us (emails, messages, WhatsApp Business or other channels).
Special category data	In limited circumstances and within legal limits: information on criminal records for due diligence purposes.
Communication preferences	Whether or not you wish to receive commercial communications from us.

Data received from third parties

We may occasionally receive information about you from the following sources:

Source	Data received
KYC/AML verification providers	Identification data, antecedentes penales, condición de Persona Políticamente Expuesta (PEP).
Credit reference agencies	Identification data, de contacto y financieros.
Public registers (Companies Registry, etc.)	Identification data, cargo, estructura de propiedad.
Sanctions lists (OFAC, EU, UN)	Identification data y financieros.
Professional social networks (e.g. LinkedIn)	Contact data e identificativos.

Where the provision of certain data is necessary to fulfil our contractual or legal obligations (in particular, KYC/AML), its supply is mandatory: if not provided, we may be unable to initiate or maintain the commercial relationship.



5. PURPOSES OF PROCESSING

We may process your personal data for the following purposes:

- To take pre-contractual measures or fulfil our contractual obligations.
- To verify your identity and carry out due diligence (KYC/AML).
- To manage the commercial relationship: invoicing, payments, collections and contract management.
- To respond to your communications.
- To prevent, investigate and/or report fraud, money laundering or other illegal activities.
- To comply with legal and regulatory obligations, including reporting to regulatory bodies and audits.
- To defend or exercise legal claims.
- To send commercial communications about Viroque Group products and services to clients or prospective clients (based on legitimate interest or, where applicable, on your consent).

6. LEGAL BASIS FOR PROCESSING

We will only use your personal data when the law permits us to do so. Most commonly, we will use your personal data in the following circumstances:

Legal basis	Examples of use
Performance of a contract (Art. 6.1.b) GDPR)	Contract management, invoicing, payments, pre-contractual measures.
Compliance with a legal obligation (Art. 6.1.c) GDPR)	KYC/AML (AML Act); tax and accounting obligations; reporting to authorities.
Legitimate interest (Art. 6.1.f) GDPR)	IT security, fraud prevention, commercial communications to existing clients, defence against claims.
Consent (Art. 6.1.a) GDPR)	Commercial communications where there is no pre-existing relationship. May be withdrawn at any time.



7. SPECIAL CATEGORY DATA

Certain particularly sensitive categories of personal data, such as information relating to criminal records or Politically Exposed Person (PEP) status, require a higher level of protection. We will process this data only:

- with your explicit written consent, in limited cases,
- where necessary to fulfil our legal obligations (in particular, in the area of AML/CTF and anti-fraud), or
- where necessary in the public interest, to the extent provided by applicable regulations.

In particular, verification of Politically Exposed Person (PEP) status and consultation of sanctions lists are covered by legal obligations in the area of AML/CTF (applicable AML legislation and implementing regulations).

8. RECIPIENTS OF DATA

We may share your personal data with the following categories of recipients:

Recipient	Reason
Other Viroque Group companies	Operational management and consolidated compliance with legal obligations (KYC/AML, tax, accounting).
External service providers (processors)	IT services (Microsoft 365/Azure), auditors (KPMG), legal and tax advisors, KYC/AML providers, messaging platforms.
Financial institutions	Processing of payments and collections.
AML/CTF authorities (SEPBLAC, MROS)	Reporting and prevention of money laundering, in accordance with applicable AML legislation.
Public administrations, regulators and courts	Compliance with legal, regulatory or judicial requirements.
Assignees or novated parties of contractual rights	For the purposes of the contract under which the rights are assigned.
Potential business acquirers	In the event of a sale or integration, your personal data may be provided to advisors and potential acquirers.



9. INTERNATIONAL DATA TRANSFERS

Viroque Group companies are located mainly in Spain and Switzerland. Viroque Energy AG (Geneva) may receive data from the Spanish entities of the Group. The European Commission has recognised Switzerland as a country with an adequate level of protection, so this transfer does not require additional safeguards.

When it is necessary to transfer data to countries outside the European Economic Area that do not have a recognised level of protection, we ensure that appropriate safeguards are in place to guarantee a level of protection equivalent to that required by applicable regulations. You may request further information about these transfers by contacting us at rgpd@viroqueenergy.com.

10. DATA SECURITY

Viroque Group has implemented appropriate technical and organisational measures to protect your personal data against loss, unauthorised access, alteration or disclosure, in compliance with Article 32 of the GDPR. Access to your personal data is restricted to staff with a justified need, under a duty of confidentiality.

We have a procedure in place to manage any data security breach and will notify you and the supervisory authority when we are legally required to do so.

11. USE OF ARTIFICIAL INTELLIGENCE (AI)

Viroque Group may use artificial intelligence tools to support internal operations, always respecting data protection principles (lawfulness, fairness, transparency and minimisation). Any processing of personal data using AI will be limited to legitimate business purposes and subject to appropriate safeguards to protect your rights.

AI will not be used to make decisions with significant effects on individuals without human intervention. Any result that may affect you will be subject to review by a qualified person.

In application of Article 22 of the GDPR, you have the right not to be subject to a decision based solely on automated processing — including profiling — that produces legal effects or significantly affects you. Should such processing be necessary, we guarantee human intervention and offer you the possibility of contesting the decision and expressing your point of view.



12. DATA RETENTION

We will retain your personal data for as long as necessary for the purposes for which it was collected, including to fulfil legal obligations:

Type of data / purpose	Retention period
Contractual and accounting documentation	6 years from the end of the relationship (Commercial Code).
KYC/AML documentation	10 years from the end of the relationship (AML legislation).
Tax data	4 years (General Tax Law) or the specific applicable period.
Commercial communications	Until you request to opt out or withdraw your consent.
Legal proceedings	Until the end of the proceedings + applicable limitation periods.

In general, the period will not exceed ten (10) years from the end of the relationship. After this period, data will be irreversibly deleted or anonymised.

13. YOUR RIGHTS

Under the GDPR and LOPDGDD, you have the right to:

- **Access:** receive a copy of the data we process about you.
- **Rectification:** request the correction of inaccurate or incomplete data.
- **Erasure:** request the deletion of your personal data when it is no longer necessary.
- **Objection:** object to processing based on legitimate interest where particular circumstances justify this.
- **Restriction of processing:** request the suspension of processing in certain circumstances.
- **Portability:** receive your personal data in a structured, commonly used format, or request its transfer to another controller.
- **Complaint:** lodge a complaint with the competent supervisory authority.



To exercise any of these rights, contact us at rgpd@viroqueenergy.com or by post at Paseo de la Castellana 55, 4th floor, 28046 Madrid. We will respond within a maximum of one (1) month from receipt of your request (extendable by two additional months in cases of particular complexity). No fee will be charged for exercising your rights, unless the request is manifestly unfounded or excessive.

If you consider that the processing of your personal data does not comply with applicable regulations, you may lodge a complaint with:

- Spain: Agencia Española de Protección de Datos (AEPD) – www.aepd.es
- Switzerland (for Viroque Energy AG): Federal Data Protection and Information Commissioner (FDPIC) – www.edoeb.admin.ch

14. RIGHT TO WITHDRAW CONSENT

Where processing is based on your consent, you may withdraw it at any time by contacting rgpd@viroqueenergy.com. Withdrawal will not affect the lawfulness of the processing carried out prior to withdrawal.

15. CHANGES TO THIS NOTICE

We reserve the right to update this Notice at any time. The current version will always be available at www.viroqueenergy.com/privacidad-terceros. We will notify you when material updates are made. Last updated: June 2026.

Notes

¹ This notice applies to Viroque Group, S.L. and other Viroque Group companies. For more information, visit www.viroqueenergy.com.

² For commercial relationships with Viroque Energy AG (Switzerland), the Swiss Federal Act on Data Protection (FADP/nDSG) additionally applies. The European Commission has recognised Switzerland as a country with an adequate level of personal data protection.



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