SHAREHOLDERS AND INVESTORS PRIVACY POLICY

Banco Santander, S.A. (the "Bank") shall process the personal data of its shareholders and investors and, where applicable, their representatives in order to comply with its legal obligations in connection with the preparation, holding and disclosure of the General Shareholders' Meeting, as well as to send them institutional and commercial communications by virtue of their status as shareholders and investors, and to invite them to participate in various initiatives organised by the Bank's Shareholder and Investor Relations area.

In this regard, by means of this Privacy Policy and in accordance with the provisions of Regulation (EU) 2016/679, the General Data Protection Regulation (hereinafter, the "GDPR"), and any other applicable legislation, the shareholders and investors are hereby informed of the following essential aspects relating to the processing of their personal data:

I. Controller of the processing of personal data

- The entity responsible for the processing of the shareholders and investors' personal data is Banco Santander, S.A., with tax identification number (NIF) A-39000013, having its registered office at Paseo de Pereda, no. 9 to 12, 39004 – Santander, and email address, for the purposes of this policy: protecciondedatosaccionistassan@gruposantander.com

- If you wish to contact the Bank's Data Protection Officer in order to obtain further information in relation to the processing of your personal data or to bring to their attention any matter of relevance, you may do so by sending a written communication to the following postal address: Calle Juan Ignacio Luca de Tena, no. 11, 28027 – Madrid, or to the following email address: privacidad@gruposantander.es

II. Personal data processed

The Bank processes the shareholders and investors' personal identification and contact details or, where applicable, those of their representatives; certain data relating to social or professional circumstances or to their status as shareholders; such data as may be necessary for the organization of an event or prize draw, or for communications or dealings with shareholders; as well as data relating to their participation in the General Shareholders' Meeting.

Such personal data can be:

- Communicated to the Bank by banking institutions and securities firms and agencies, through the entity legally authorized to maintain the book-entry securities register (*Sociedad de Gestión de los Sistemas de Registro, Compensación y Liquidación de Valores, S.A. – IBERCLEAR*);

- Generated at the General Shareholders' Meeting as a result, where applicable, of the participation of those attending the General Shareholders' Meeting (the "Participants") through the participation mechanisms made available.

- Provided directly by the shareholders:
  - In the exercise of their rights of attendance, proxy-granting and voting at the General Shareholders´ Meeting, including those recorded on the attendance, proxy and voting card, as well as on the General Shareholders' Meeting Platform;
  - Through the various communication channels made available for this purpose or through the forms provided to register for events or prize draws in which they participate;
  - As contact details relating to their status as a customer of the Bank, where applicable;
  - In the case of institutional investors or shareholders, to identify the relevant contact persons.

Shareholders' contact details will be kept up to date. Therefore, if such details are modified, the Bank will process the most recent data.

In the event that personal data relating to natural persons other than the shareholder are provided, it is warranted that the relevant third party has been provided with this policy or has been informed of the matters set out herein in relation to the processing of personal data, and that any other requirements that may be applicable for the lawful disclosure of such personal data to the Bank have been complied with, without the Bank being required to take any further action regarding such third parties.

III. Purposes of the processing of personal data and legal bases relied upon

The Bank shall process the shareholder's personal data for the fulfilment of the following principal purposes:

1. **Management of Banco Santander´s Register of Shareholders.** The Bank shall maintain a register containing the shareholder's identifying information (first name and surname(s)), shareholding position (number of shares) and contact details (contact telephone number and address). Such register shall be duly kept up to date and, in accordance with the uses provided for under the applicable regulations, may be consulted by any shareholder.

   The legal basis upon which this processing is carried out is compliance with the obligation established in Royal Legislative Decree 1/2010 of 2 July, approving the consolidated text of the Spanish Companies Act, without prejudice to the inclusion of additional data necessary for the proper performance of the existing legal relationship by virtue of the status of shareholder.

2. **Management of the General Shareholders´ Meeting.** The fulfilment of this purpose involves the following processing activities:
   - **Preparation of the General Shareholders' Meeting.** The Bank shall use the shareholders' data for the purpose of sending the call notice for the meeting, as well as for the

preparation and dispatch of the mandatory documentation that must be sent to the shareholders, including the personalized attendance, proxy and voting card, as well as the communication from the Chair of the Bank or, where applicable, from the General Secretariat, containing the shareholder's personal data necessary for the exercise of their shareholder rights.

- **Management of registration and access to the General Shareholders' Meeting Platform.** Registration on the General Shareholders' Meeting Platform, as well as to access and to use thereof, shall be carried out by means of the digital access credentials issued to the shareholders. In this regard:

- **In the case of shareholders who are customers of Banco Santander, S.A.,** registration shall be carried out by means of the digital access credentials for the Bank's online banking services, when available; and,

- **In the case of shareholders who are not customers of Banco Santander, S.A., who do not have digital access credentials for the Bank's online banking services and, in any event, legal persons and proxies that are not shareholders of Banco Santander,** registration shall be carried out by means of the digital access credentials which may be obtained, subject to prior acceptance of the relevant terms and conditions, and through the any of the following means (freely and voluntarily choosing whichever is preferred):

  - By identifying themselves and presenting the appropriate documentation at a branch within the Santander Bank's network in Spain.

  - Using a digital certificate or the electronic National Identity Card (eID), only available to individuals.

  - By requesting automated online video identification. To complete this process, the applicant will be required to capture a photograph of their face (a selfie) and present an accepted official identification document. This information will be used to (i) compare, using automated systems, the biometric data obtained from the facial photograph with the photograph contained in the identification document, and (ii) verify the validity of the applicant's identification document. The process will subsequently be reviewed by an agent (a natural person), who will confirm the successful completion of the video identification procedure.

    These processing activities are based on Banco Santander's legitimate interest in verifying the identity of the shareholder (authentication) requesting the access credentials, as supported by a legal authorization. In addition, the processing of data arising from the automated online video identification option (including the image of the applicant's identification document and their biometric data) is also based on the applicant's freely and explicitly given consent.

- **Enabling of the Electronic Shareholders' Forum.** The personal data provided by the shareholders for their registration in the Electronic Shareholders' Forum, or generated as a result of its use (identification and contact details, as well as data relating to their status as shareholders), shall be processed by the Bank for the purpose of establishing,

managing and supervising the operation of the Forum, in accordance with the Rules of Operation of the Electronic Shareholders' Forum.

- **Holding of the General Shareholders' Meeting and handling of the shareholders' political rights.** The Bank shall process the shareholders' data for the purpose of managing attendance, participation and voting (including proxy-granting and/or advance voting); the communication of the relevant information; the uploading and publication of the documentation relating to the call notice for meeting and holding of the meeting on the corporate website (www.santander.com); and on the General Shareholders´ Meeting Platform; as well as any other action necessary for the proper handling of the corresponding right.

  Participants in the General Shareholders' Meeting are hereby informed that artificial intelligence-based tools are used to automatically transcribe, translate into other languages (where necessary) and classify their contributions at the meeting according to their content, on the basis of the Bank's legitimate interest in adopting the most appropriate organizational and technological measures to ensure the proper management and conduct of the meeting. If you object to the processing described above, please contact us in the manner indicated in section "Exercise of Rights" below.

  The personal data of the shareholders, or their representatives, as well as of the Participants in the meeting, provided through any of the channels made available for this purpose, may be disclosed to the notary attending the General Shareholders' Meeting and, where appropriate, communicated to third parties in the exercise of the right to information provided for in the Spanish Companies Act. Such data may be accessible to the public from any territory, including from outside the European Union, through the Bank's corporate website.

  To the extent that Participants take part through any of the channels made available for this purpose, their image and/or voice shall be captured. The processing of the Participants' information shall be carried out in accordance with data protection legislation, as well as with Organic Law 1/1982 of 5 May on the protection of the right to honor, personal and family privacy, and one's own image.

  Shareholders or, where applicable, their representatives are hereby informed that, by participating in the General Shareholders' Meeting, by audio or video, the audiovisual recording of their image and/or voice shall be carried out, as well as the reproduction and/or public dissemination thereof, by making such content available to the other attendees of the general meeting through the General Shareholders' Meeting Platform, in compliance with the provisions of the Spanish Companies Act. Such dissemination may entail that third parties have access to data relating to their image and/or voice.

  In the event of proxy appointment in favour of a third party, the data of the shareholder granting the proxy shall be disclosed to the third party to whom the proxy has been granted in order to enable such third party to fulfil the mandate conferred.

- **Dissemination of the General Shareholders' Meeting.** For the fulfilment of this purpose, the Bank shall carry out the recording of the General Shareholders' Meeting, which may in turn be broadcast through the appropriate channels. The personal data

of the Participants (first name and surname(s)) may be reproduced and/or publicly disseminated on the corporate website, on social media platforms and through accredited media outlets.

The legal basis upon which the aforementioned processing activities are carried out is compliance with the legal obligations established under the applicable legislation and, in particular, those set out in Royal Legislative Decree 1/2010 of 2 July, approving the consolidated text of the Spanish Companies Act, as well as in Law 6/2023 of 17 March on Securities Markets and Investment Services.

Furthermore, in the case of the dissemination of the General Shareholders' Meeting, the Bank's legitimate interest shall also apply, consisting in informing about the General Shareholders' Meeting and ensuring the transparency of the General Meeting of Shareholders and the voting results, in compliance with corporate governance best practice recommendations. Participants may object to the processing of their personal data for this purpose on grounds relating to their particular situation, in the manner indicated in section "Exercise of Rights" below.

3. **Management and development of the relationship with shareholders and investors.** For this purpose, the Bank will maintain and keep up-to-date a data base that will be processed for the following activities:

   - **Sending of institutional communications by the Shareholder and Investor Relations area.** The Bank shall send shareholders and investors regulatory and institutional communications containing relevant information related to their status as shareholders (including information regarding the General Shareholders' Meeting and the encouragement of participation, quarterly reports, information on corporate transactions, dividends and other institutional communications, among others).

   The legal basis upon which this processing activity are carried out is the performance of the existing legal relationship arising from the status of shareholder. In the case of institutional shareholders, contact details shall be processed based on the legitimate interest in maintaining the relationship with their employing entity in its capacity as an institutional shareholder.

   - **Management of access to the "*Área Privada de Accionistas*".** The Bank shall process the data of shareholders who wish to access the "Área Privada de Accionistas" portal in order to manage their access and, where applicable, registration, so that they may benefit from the services and functionalities offered. Access to this environment shall be by means of digital access credentials, in the manner indicated in point 2 of this section of the policy.

   - **Management of attendance at events or forums organized by the Bank.** Where a shareholder or investor voluntarily decides to participate in such events, the Bank may process their personal data, including any data necessary to facilitate attendance at the relevant event.

   - **Management of participation in prize draws and promotional activities organized by the Bank's Shareholder Relations area.** In those cases where shareholders

voluntarily decide to participate in such promotions and/or initiatives, the Bank shall process their personal data for the purpose of managing their participation, as well as, where applicable, for the communication and disclosure of their status as a winner.

The management of access to the "*Área Privada de Accionistas*" portal, as well as attendance at events or forums and participation in prize draws and promotional activities offered, shall be carried out in performance of the legal relationship arising from the shareholder's request for access, attendance or participation.

- **Sending commercial communications regarding products and services offered by the Bank through the Shareholder and Investor Relations area.** The Bank may use the shareholders' email address, telephone number and postal address to: (i) send them commercial communications concerning certain products and services offered by the Bank to its shareholders under preferential terms; and (ii) inform them of the possibility of participating in prize draws organized by the Shareholder and Investor Relations area; and (iii) send them invitations to events and forums organized by the Bank or in which it participates.

- **Carrying out satisfaction surveys.** In certain cases, the Bank shall send data subjects a satisfaction survey by email in order to obtain their opinion regarding events, forums, prize draws and promotional activities organized by the Shareholder and Investor Relations area.

The legal basis for sending shareholders the aforementioned commercial communications is the Bank's legitimate interest, consisting in offering advantages to shareholders by virtue of their status as such, with a view to enhancing their level of satisfaction and fostering loyalty.

The sending of surveys to shareholders shall likewise be based on the Bank's legitimate interest in assessing their level of satisfaction with the initiatives carried out by the Bank's Shareholder and Investor Relations area.

You may object to the processing of your personal data based on legitimate interests in the manner indicated in section "Exercise of Rights" below.

4. **Handling of enquiries submitted by the shareholder through the available contact channels.** The following processing activities relating to the shareholders' personal data shall be carried out for this purpose:

   - **Assessment, handling and response to enquiries, queries and suggestions.** The Bank shall use the shareholder's personal data in order to properly address any enquiries, queries or suggestions that the shareholder may submit through the various contact channels available (email, telephone, WhatsApp, etc.).

   - **Analysis and retention of communications.** This processing activity may involve the retention of the shareholder's personal data, including voice data where the shareholder contacts the Bank by telephone, for the purpose of analyzing and identifying the quality of the service provided by the Bank in relation to the specific matter raised.

The legal basis upon which the matters raised by the shareholder are handled is the performance of the existing legal relationship between the Bank and its shareholders.

Furthermore, the analysis and subsequent retention of communications is carried out based on the Bank's legitimate interests, consisting in providing and evidencing the proper attention and support given by the Bank to its shareholders in fulfilment of their shareholder relationship.

You may object to this processing based on legitimate interests in the manner indicated in section "Exercise of Rights" below.

IV. Retention of the personal data processed

Information relating to those processing activities carried out for the proper development of the shareholder relationship shall be retained until shareholder status is lost and, thereafter, for a period of 10 years in order to evidence the Bank's proper compliance with the applicable obligations.

Information relating to the preparation, holding and dissemination of the General Shareholders' Meeting shall be retained for a period of 10 years from the date on which it is held, in order to ensure the traceability and validity of the corporate resolutions adopted; to support the Bank's defense in the event of any challenges; and to evidence, in relation to the shareholders and/ or regulators, the Bank's proper compliance with the legal obligations applicable to it, as well as with established corporate governance best practice recommendations.

Furthermore, information relating to those processing activities carried out in order to address matters raised by the shareholders, as well as their requests for access, assistance or participation, together with information relating to the sending commercial communications concerning the Bank´s own products and those of third parties, as well as satisfaction surveys, shall be retained while shareholder status is maintained and, following its termination, for a period of 6 years, in order to analyze, verify and evidence the proper handling thereof.

Once the periods indicated above have elapsed, the data shall be permanently erased, except where it must be retained in a restricted form for the purpose of being made available to the courts and tribunals, as well as to any other competent Public Authorities.

V.- Disclosure of Personal Data and International Transfers

No disclosure of the shareholders' personal data is envisaged other than those disclosures carried out in the context of the purposes previously described.

Without prejudice to the foregoing, shareholders are hereby informed that their personal data may be disclosed to the competent authorities in the exercise of their functions where required by law.

Additionally, the data may be accessible to the Bank's service providers, such access being limited to what is necessary for the proper fulfilment of the purposes indicated above.

Such providers shall process the data solely in accordance with the uses authorized by the Bank and shall not process the data for their own purposes. By way of example and without limitation, the Bank engages technology service providers for the operation of its platforms, repositories and related systems, as well as advisory services for the proper conduct of its activities and compliance with its legal obligations.

In this regard, the Bank applies strict criteria in the selection of its service providers in order to comply with its data protection obligations and enters into the corresponding data processing agreements, as required by law, pursuant to which it imposes, among others, the following obligations: to implement appropriate technical and organizational measures to ensure the security of personal data; to process personal data solely for the agreed purposes and strictly in accordance with the documented instructions of the controller; and to delete or return the data to the Bank upon completion of the services.

Where any of the services contracted by the Bank involve the processing of your personal data outside the European Economic Area, it is ensured that such processing shall be carried out subject to appropriate safeguards, such as the execution of standard contractual clauses or the selection of providers participating in specific frameworks recognized as ensuring an adequate level of data protection (such as, for example, the EU–U.S. Data Privacy Framework).

VI.-Exercise of Rights

Data subjects whose personal data is processed by the Bank in relation to the aforementioned purposes may submit requests to exercise their rights of access, rectification, erasure, objection, restriction of processing and data portability, as well as any other rights that may be applicable under data protection legislation, as appropriate in accordance with the GDPR and any other applicable regulations, by sending a written communication to Ciudad Grupo Santander, Avda. de Cantabria, Edificio Pereda, 2nd Floor, 28660 – Boadilla del Monte (Madrid), Spain, or to the following email address: protecciondedatosaccionistassan@gruposantander.com.

Furthermore, data subjects may lodge a complaint with the competent data protection supervisory authority, which in Spain is the Spanish Data Protection Agency (Agencia Española de Protección de Datos) (www.aepd.es), should they consider that their personal data has not been properly processed or that their rights have not been duly addressed.