Openbank

Date of last update: December 2021

At Open Bank, S.A. (hereinafter, "OPENBANK") we use trackers in our app (hereinafter, the "App") and we want to tell you all about our cookie policy and other trackers (hereinafter, the "Cookie Policy").

1. What are trackers?

In this policy, the term "trackers" refers to the set of tracking mechanisms used for data storage and retrieval that are enabled on your device when you log in to and browse our App. They even contain a number that uniquely identifies your mobile device, even if you change location or IP address.

2. What are they used for?

Trackers allow us to collect data that could identify you or your approximate location, the connection time, the device from which you log in (fixed or mobile), the operating system and browser used, the most visited pages, the number of clicks performed and data about your online behaviour.

Additionally, in some cases, they save information about your browsing habits and preferences that will allow us to provide you with a better and more customised experience, and will even show you advertising related to your preferences every time you use our App.

They also allow us to collect data about patterns of usage of our App in order to identify problems and make improvements, develop new products or services and generate statistics or measurements of usage.

3. How are trackers enabled?

Trackers can be enabled in different ways, depending on their purpose. In some cases, they are necessary for our App to run properly, so they are enabled during browsing; while in other cases, since your authorisation will be required, they will be enabled when you give us your permission. You can make changes to this consent at any time through the various settings options we provide later on in this Cookie Policy.

Please note that you can log in to our App with no need for all the trackers to be enabled (with the exception of technical trackers), although disabling them may prevent or hinder the proper performance of the App.

4. What types of trackers do we use?

Below, we explain which trackers you can find when browsing our App and what they are used for:

4.1. Technical trackers

These own or third-party trackers are used, for example: to identify you when you log in to your Customer Area, to remember or validate products that you use, to validate various transactions you perform with us (such as a transfer), to resolve technical errors or to control potential security threats to a service. They are necessary to ensure the optimal performance of the App, our products and services and the security we provide.

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Type	Cookie	Tracker	Purpose	Duration
3rd	ADRUM	Appdynamics	Used to monitor app errors.	Session
3rd	s_ppvl	Appdynamics	Used to monitor app errors.	Session
3rd	s_ppv	Appdynamics	Used to monitor app errors.	Session
Own	Bmuid	Akamai	Performance. Required for user browsing.	90 days
Own	CONSENTMGR	Tealium	Required to know whether or not the user consents to trackers in the different categories into which they are classified.	90 days
Own	utag_main	Tealium	Required to load Tealium, the tool used to display the cookie consent modal. Saves the timestamp (date) of visit, a random number and the number of sessions of that random number.	1 year
Own	cdContextId	Biocatch	Required to detect fraudulent cases.	Session
Own	cdSNum	Biocatch	Required to detect fraudulent cases.	1 year

4.2. Analytics trackers

These own or third-party trackers are used to perform statistical analyses of App usage and to develop improvements that will enhance your browsing experience. For example, we monitor your visits in order to analyse and understand how you use our App, in efforts to make it more user-friendly and to quantify the impacts of advertising during your browsing session.

What are they and what do we use them for?

Type	Cookie	Tracker	Purpose	Duration
Own	_ga	Google Analytics	Used to identify users.	2 years
Own	_ga_<container-id>	Google Analytics	Used to maintain the session status.	2 years
3rd	_gat_tealium_0	Google Analytics	Used to limit the percentage of requests.	Session
3rd	_gid	Google	Used to differentiate between users.	1 day
Own	fpc_TypeUsuario	Tealium	Used to remember if you are already a customer in order to improve measurement.	Session

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Type	Cookie	Tracker	Purpose	Duration
Own	fpc_org	Tealium	Used to remember the origin of the session in order to improve measurement.	Session
3rd	TAPID	Tealium	Inter-session identifier (same value as utag_main)	1 year
Own	TLTSID	IBM	Enabled only during the duration of a browser session, it is used to group visits in a session. The end user can choose whether or not to enable this tracker.	Session

4.3. Behavioural advertising trackers

These own or third-party trackers store information about your behaviour, obtained by analysing your browsing habits. As such, we can personalise the ads we show you based on your profile, in turn ensuring you find them useful.

What are they and what do we use them for?

Type	Cookie	Tracker	Purpose	Duration
3rd	_fbp	Facebook	Identifies browsers to provide advertising and website analysis services.	90 days
3rd	DDMMUI-PROFILE	Google	Used to track on-site conversions across all media channels. To build audiences from users who have visited the website, allowing us to post relevant ads through a DV360 (Display programmatic) account.	2 years
3rd	Aid	Google	We use this cookie to link activity across devices if you have previously signed in to your Google Account on another device. We do this to coordinate the ads users see across devices and to measure conversion events. These trackers can be set on the domains google.com/ads, google.com/ads/measurement or googleadservices.com.	30 days
3rd	C_user	Facebook	We use trackers to verify your account and determine whether you are logged in, in order to help you access Facebook products and offer you the right experience and features.	1 year
3rd	DSID	Google	It is similar to the AID tracker, which is used to link activity between devices if the user has previously signed in to the Google Account on another device. We do this to coordinate the ads users see across devices and to measure conversion events. These trackers can be set on the domains google.com/ads, google.com/ads/measurement or googleadservices.com.	1 year

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Type	Cookie	Tracker	Purpose	Duration
3rd	Fr	Facebook	We use trackers to display advertisements from companies and other organisations and recommend them to people who may be interested in the products, services or causes promoted by these companies.	90 days
3rd	IDE	Google	One of the main advertising trackers on non-Google sites, stored in browsers under the doubleclick.net domain.	2 years
3rd	SAPISID	Google	Google API session trackers	1 year
3rd	Sb	Facebook	Security and integrity of websites and products. We use trackers to protect your account, your data and Facebook products.	2 years
3rd	SID	Google	Google trackers. Google uses trackers such as the NID and SID cookie to help personalise ads on Google properties, such as Google Search results.	1 year
3rd	SSID	Google	Analysis through user identification	1 year
3rd	Test_cookie (Double_Click)	Google	This tracker is used to confirm that your browser is able to accept trackers and expires when you close your browser.	Session
3rd	Wd	Facebook	Performance. We use trackers to provide you with the best possible experience.	7 days
3rd	Xs	Facebook	Authentication: we use trackers to verify your account and determine whether you are logged in, in order to help you access Facebook products and offer you the right experience and features.	1 year
3rd	dpr (Facebook)	Facebook	Performance: we use trackers to provide you with the best possible experience.	7 days
3rd	csrf (Facebook)	Facebook	Website and product security and integrity: We use trackers to protect your account, your data, and Facebook products.	2 years
Own	fpc_gclid	Google	Used for advertising measurement. It is used to persist an id in order to correctly attribute Google conversion.	30 days

4.4. Trackers for product development and improvement

These third-party trackers use information about your device and the type of browsing you perform in order to design and create algorithm-based behavioural models. For example, we analyse the data from your visits to our App in order to optimise the design of the products.

These models enable us to build user profiles so that we can send you marketing tailored to your interests and, on a more generic basis, predict your financial behaviour and suggest related Openbank products. For example, we can use data about your browsing in order to send you communications about events related to the pages you have browsed.

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Type	Cookie	Tracker	Purpose	Duration
3rd	_ga	Google Analytics	Used to identify users.	2 years
3rd	ga_<container-id>	Google Analytics	Used to maintain the session status.	2 years
3rd	_gat_tealium_0	Google Analytics	Used to limit the percentage of requests	Session
3rd	_gid	Google Analytics	Used to differentiate between users.	1 day

5. How long are trackers enabled for?

Depending on the type of trackers, and the information we provide about each of them, trackers may remain enabled for a longer or shorter period of time.

For example, session trackers are designed to collect and store data while you access a website. When the browser is closed or the session expires, these trackers disappear.

Persistent trackers, however, are still enabled when you leave the App and then log back in to it. They will remain stored for the time specified in each case, although you may delete them at any time.

6. Who processes or manages the trackers?

Data collected by trackers may be managed by both Openbank and third parties. In the explanation of each of the trackers above, we inform you about which trackers are our own and which are third party (3rd).

You may access the privacy policies of third parties that manage trackers on the App by clicking on the links included directly in the explanation of each tracker above (in the "Owner" column).

For example, you will see that the third-party trackers we use are those of Google Analytics, part of Google Inc., which allow Google to monitor on our behalf how visitors use our App, to collect reports and to help improve the App. For further information on how Google collects and processes data, visit https://policies.google.com/privacy?hl=en.

Please note that if you accept a third-party cookie and, for example, you access a YouTube video, YouTube can then set trackers using this code and it will know that you have watched that video, or even visited the page where the video is located.

7. I have accepted the trackers but now I want to disable them. How do I do this?

You can easily modify your preferences for trackers at any time, including disabling all but those technically necessary for the App to work properly, as explained below:

You must open the App and log in. Once you have logged in, tap on the side menu on the left (the three horizontal stripes) and at the bottom of the menu you will find the Cookies Policy of the App, where you can change your preferences.

Please note that some features of our App content are only available if you allow certain trackers to be installed in your browser. If you choose not to accept, or to block certain trackers, depending on their purpose, this may, wholly or in part, affect how our App runs normally or prevent access to some of the services it offers.

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8.   Processing of personal data

8.1. Data Controller

Open Bank, S.A. Plaza de Santa Bárbara, 1 y 2, 28004, Madrid.

Contact the Data Protection Officer: privacy@openbank.es

Please find basic information about how we process your data obtained through trackers below. Further information can be found at https://www.openbank.es/en/privacy-cookies.

8.2. Purposes of processing and lawful basis

The purposes for which we process the personal data we obtain through trackers are set out in section "4. What types of trackers do we use?".

The use of technical trackers by Openbank is necessary to enable your browsing on our App. The use of other trackers is subject to your consent, which you can manage as explained below:

You must open the App and log in. Once you have logged in, tap on the side menu on the left (the three horizontal stripes) and at the bottom of the menu you will find the Cookies Policy of the App, where you can change your preferences.

As reflected in section "7. I have accepted the trackers, but now I want to disable them. How do I do this?"

8.3. Recipients

- We collaborate with third-party providers who may have access to your data in order to provide us with services that are always under contract. They will process the data in our name and on our behalf, following our instructions at all times. For example, Google or Tealium.

- We make international transfers of your data, only in the context of some of the above-mentioned service provisions, both to countries providing an adequate level of protection, comparable to that of the European Union, as well as to countries that do not benefit from this level of protection. In the latter case, you do not have to worry. Openbank uses mechanisms established by regulations to comply with all guarantees, such as standard contractual clauses or certification mechanisms. You will be able to view the international transfers of data we carry out here, or by writing to privacy@openbank.es.

Furthermore, in relation to third-party trackers, we would like to remind you that they are either sent from a domain not managed by Openbank but by the relevant third party, or from our domain, in which case the information collected is handled by that third party. You can find more information on any disclosures carried out by third parties, including international data transfers, if applicable, in their respective tracker policies.

8.4. Retention periods

Your data will be processed for the periods indicated in section "4. What types of trackers do we use?" - while your usage authorisations are still valid.

We will subsequently retain the data, which will be duly blocked, for the timeframes legally established for the actions arising from such authorisation, if required to respond to any claim concerning our use of your data. After such periods, we will proceed to destroy the data.

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8.5. Data protection rights

Please be informed that you have, and may exercise, the following rights: access, portability, rectification, erasure, objection, limitation of processing and the right not to be subject to a decision based solely on automated processing. For further information on your rights, visit. www.openbank. es/en/privacy-cookies.

9.   Changes to the Cookie Policy

Openbank is committed to keeping this Cookie Policy updated in order to collect any new information available in connection with the trackers we use.

For this reason, it is important that you regularly spend time reading and making sure you understand it.

For any relevant modification that we need to make, we will notify you in advance, at least through our App, so that you have the opportunity to be properly informed at all times.

10. Do you have any questions?

If you have any questions about the Cookie Policy for our App, you may contact us by writing to: Plaza de Santa Bárbara 1 y 2, 28004, Madrid, or by email to privacy@openbank.es.

11. Finally, we suggest you:

- Check the Cookie Policy on a regular basis for information about possible changes.
- Read the Cookie Policy in conjunction with our data protection policy, which is also available on our App, where we explain how we process your personal details.
- You can download our Cookie Policy.