

CHM COMPLIANCE FULL PRIVACY NOTICE

CHM Compliance, S.A.P.I. de C.V., hereinafter the “Organization”, with address at Blvd. Reforma 5420, piso 7, oficina 702-A, Col. La Rosita, El Yaqui, Alcaldía Cuajimalpa de Morelos, Mexico City, C.P. 05340, is in charge of the treatment and protection of your personal data in accordance with the Federal Law for the Protection of Personal Data in Possession of Private Parties (the “Law”), its Regulations, the Privacy Notice Guidelines and our internal policies, we provide you with this privacy notice (the “Privacy Notice”).

We inform you of the following:

Personal data or information processed by the Organization 2.

In order to carry out the objectives included in this privacy notice, the following personal data will be used:

Representation data (Identification and address of the individual and/or legal entity).

- Identification Data
- Contact Data
- Patrimonial Data
- Financial Data

We inform you that the Organization, Data to which the Organization could have access and with which the Organization will act as responsible for the treatment of these, which may vary with respect to the scope and type of service contracted with the Organization:

- Personal data of the Client's collaborators.
- Identification, contact and patrimonial data of the Client's suppliers and business partners.
- Financial and Patrimonial Information of the Client and, if applicable, of the companies he/she controls.

It should be noted that the processing of personal data and those to which the Organization has access, will be treated only in accordance with the instructions of the Client, we refrain from processing personal data for purposes other than those instructed by the Client and we keep confidentiality regarding the personal data processed.

2. Main purposes of the processing

The personal data collected will be used for the fulfillment of the obligations arising from the legal relationship between the Organization and the Client (data controller), understanding that they are necessary to provide the service requested:

- Consultancy in implementation of Integrity Policies and internal regulatory compliance systems, under national and international compliance standards.
- Operational and financial risk management.
- Outsourced Compliance Officer for CUFSAR.
- Outsourced Compliance Officer in anti-bribery management systems.
- First party audit considering national and international regulations.

3. Secondary purposes of processing

The representation data collected for purposes other than the legal relationship in force will be used for the development and follow-up of Clients.

In order to have consent for this purpose check one of the following boxes:

- If I wish to be contacted or sent information for Customer development and follow-up purposes.
- I do not wish to be contacted or sent information for the development and follow-up of Clients.

The Client of the personal data, may revoke or cancel the consent for the processing of the representation data for this purpose, being able to notify it through the Procedure of request of attention to ARCO Rights that is indicated in section 8 of this Privacy Notice.

4. Transfers of Personal Data

The Organization is committed not to transfer any personal data to third parties (individuals and legal entities of public, private, social or mixed nature).

The only data transfers that may be made will be to cover the following assumptions:

- (i) that there is a legal provision that obliges to do so,
- (ii) there is a request from a competent authority,
- (iii) the transfer is necessary or legally required to safeguard a public interest or for the administration of justice, or
- (iv) the transfer is necessary for the recognition, exercise or defense of a right in a judicial proceeding, and
- (v) when the transfer is necessary for the maintenance or fulfillment of a legal relationship between the Organization and the Client (data controller).

(vi) when there is express authorization from the Client (data controller) to share its information or the information for which it is responsible.

In accordance with the above assumptions, we inform that the transfers maybe to:

- Authorities that require the information in terms of the applicable legislation.
- Entities within our corporate group, which operate under the same processes and internal policies of the Organization.
- Authorities that request it from us as part of a judicial or administrative process where it is necessary to disclose information or personal data.

In any case, whether the transfer is national or international, we will deliver or make available to the recipient, this Privacy Notice and that it assumes, at least, the same obligations to which the Organization is subject. This, by means of contractual clauses or other legal instruments entered into between the Organization and the recipients of the data or electronic/automated acceptances of the same.

We inform you that the transfers listed in this section are all permitted in terms of article 37 of the Law, so it is not necessary for this Privacy Notice to contain a clause of acceptance of personal data transfers.

We also note that the Organization may be required to share (forward) personal information or data with suppliers (processors) who provide services to us and in the event that they require the processing of data, they will use the personal information or data only on our behalf, in accordance with our instructions and in terms of the written contract setting out the scope and content of our relationship with the relevant supplier (processor).

5. Confidentiality of information

The confidentiality of your data is guaranteed and they are protected by administrative, technical and physical security measures to prevent their damage, loss, alteration, destruction, use, access or improper disclosure. Only authorized persons will have access to the Client's personal data or information.

6. Permission to use logos

The Organization may make use of the Client's logo and/or trade name in corporate presentations and on the Organization's website for informational purposes, it should be clarified that the content and information of the project will be treated confidentially.

- I accept and authorize the use of the logo and/or trade name.
- I do not accept or authorize the use of the logo and/or trade name.

In accordance with the provisions of Article 386 of the Federal Law for the Protection of Industrial Property, the Organization undertakes, in the event of having authorization from the Client for the use of the logo and/or trade name, to expressly mention in each case that it uses the logo and/or trade name of the Client that there is no association of any kind between the Organization and the Client, in order to avoid confusion or error in the public.

7. ARCO Rights

The “*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*” contemplates rights that the holders or owners of personal data can exercise in relation to personal data and can be exercised at any time. These rights are called “ARCO Rights” and are set forth below:

- (i) Access to those personal data that are in the possession of the Organization, as well as to know the details of the processing of the same,
- (ii) Rectify them in case they are outdated, inaccurate or incomplete,
- (iii) Cancel them, and
- (iv) Oppose their processing for specific purposes.

8. Procedure for requesting attention to ARCO Rights

This procedure may be executed for the exercise of ARCO Rights, Revocation of Consent or Limitation of data or information to be processed by the Organization of any owner or owner of their data, as well as for any other request that, as a Client of the Organization, requires to be made with respect to the processing of personal data or information that the Organization may process.

The applicant must send an e-mail to denuncia@chmcompliance.com, accompanied by the following information and documentation:

- (i) Full name of the holder.
- (ii) E-mail address of the holder to communicate the response to the request.
- (iii) If applicable, the Client's company name or denomination.
- (iv) If applicable, indicate the type of relationship you have with the Client and institutional e-mail address.
- (iv) If applicable, indicate the type of relationship you have with the Client and institutional e-mail address.

Attach the following documentation:

- (i) Current official identification proving the identity of the holder and/or applicant.

If legal representation is required, the following must be attached:

- (i) Current official identification of the holder and the legal representative.
- (ii) Public instrument (power of attorney before a notary public) or power of attorney signed before 2 witnesses, or statement in personal appearance of the holder, the above to prove the representation of the holder.

Regarding the ARCO right to be exercised, Revocation of consent or Limitation of data or information to be processed by the Organization, please indicate:

- (i) The clear and precise description of the personal data or information with respect to which you seek to exercise any of the aforementioned rights.
- (ii) Any other element or document that facilitates the location of the personal data or information processed.

With respect to any other request for information you wish to make, please indicate:

- (i) Clear and precise description of your request.
- (ii) Justification or reason why I will require the request to be fulfilled.

Upon receipt of the response on the confirmation of the request, the Organization will resolve the request within 15 (fifteen) working days.

The aforementioned deadlines may be extended once for an equal period, provided that the circumstances of the case so justify. If you do not respond to our resolution with any confirmation, we will understand that in good faith you are in agreement with the resolution.

We note that, as the person in charge of the personal data, the Organization may refuse to exercise the requested ARCO Right, in the cases allowed by the Law and its Regulations, in which case we will inform the reasons for such refusal to the applicant. The refusal may be partial, in which case we will carry out the access, rectification, cancellation or opposition in the appropriate part.

9. Revocation of consent to the processing of your personal data

You may revoke your consent to the processing of personal data or information, following the same procedure as for the exercise of your ARCO Rights (see section 8 of this notice), in the understanding that once your revocation request is at the disposal of the Organization, a reply will be issued within a maximum period of 5 (five) business days.

10. Questions, complaints and comments

You may contact us at any time, as we are at your entire disposal to address any concerns, complaints or comments regarding the processing of your information and any personal data that we process on your behalf.

The Head of the CHM Compliance Officer or CHM Compliance Officer is the person in charge of processing and following up on your requests and promoting the protection of personal data within our organization, who can be contacted at the following e-mail address denuncia@chmcompliance.com.

11. Options to limit the use or disclosure of your personal data

You can limit the use or disclosure of the same following the same procedure as for the exercise of the ARCO Rights (see section 8 of this notice), in the understanding that once the request is available to the Organization, the response will be issued within a period not exceeding 5 (five) business days.

In order to promote the limitation of the use and disclosure of data, we note that there are other mechanisms such as the Public Registry to Avoid Advertising (REPEP) administered by the Federal Consumer Protection Agency (<https://repep.profeco.gob.mx/>) and the Public Registry of Users who do not want advertising information on Financial Products and Services (REUS) of CONDUSEF (<https://webapps.condusef.gob.mx/reus/app/registro.jsp>), in which you can register free of charge.

12. Cost of procedures

All of the above procedures are free of charge, and upon agreement between the holder or owner of the personal data, Client and the Organization, the means by which the response or sending of the information is required (if applicable) may be charged.

13. Use of cookies, web beacons and other similar technologies

We inform that there are services offered through the Internet that can use mechanisms such as Cookies, Web Beacons and other technologies through which data are collected automatically and simultaneously, such as the IP address of origin, browser used, operating system, time at which the page was accessed, being possible to monitor your behaviour as a user of Internet services. Below, we define each term:

Cookies: Data file that is stored in the hard disk of the computer equipment or electronic communications device of a user when navigating in a specific Internet site, which allows the exchange of status information between said site and the user's browser. The state information may reveal means of session identification, authentication or user preferences, as well as any data stored by the browser with respect to the website.

Web beacons: Visible or hidden image inserted within a website or email, which is used to monitor user behaviour in these media. Through these it is

possible to obtain information such as the IP address of origin, browser used, operating system, time at which the page was accessed, and in the case of email, the association of the data.

Browser Controls: Most browsers will allow you to access the cookies that have been stored on your computer, and you can delete them individually, or block them for all or specific websites. Any preferences you have set will be lost if you delete all cookies, including the options to opt out of cookies, as this process requires you to disable the use of cookies.

For more information about how to modify your browser settings to block or filter cookies, please see <http://www.aboutcookies.org/> or <http://www.cookiecentral.com/faq/>.

14. Changes to our privacy notice

At any time the Organization may make modifications, changes and/or updates to this Privacy Notice, which will be made available to the general public through the web portal (<https://chmcompliance.com/>).

DATE OF LAST UPDATE: MARCH 14, 2024