



## **Policies and procedures manual of Information Security**

**PRIVACY NOTICE related to personal data collected by ARGUILEA, S.C. (hereinafter referred to as “ARGUILEA”).**

### **1.- General Information**

**1.1.- ARGUILEA IS A CORPORATION COMMITTED AND RESPECTFUL OF THE RIGHTS ON PERSONAL DATA OF INDIVIDUALS ACKNOWLEDGED BY THE PROVISIONS OF ARTICLE 16 PARAGRAPH II OF THE POLITICAL CONSTITUTION OF THE UNITED MEXICAN STATES AND THE PROVISIONS OF THE FEDERAL LAW OF PERSONAL DATA PROTECTION HELD BY THIRD PARTIES, ITS REGULATION AND THE OTHER APPLICABLE RULES AND REGULATIONS. BASED ON THE ABOVE, IT MAKES THIS PRIVACY NOTICE AVAILABLE FOR THE OWNER OF THE PERSONAL DATA MAY ASSERT HIS/HER RIGHT TO INFORMATIVE SELF-DETERMINATION.**

**1.2.- UPON ENTERING AND USING THE WEB PAGE WHICH DOMAIN NAME IS [WWW.ARGUILEA.COM](http://WWW.ARGUILEA.COM) UNDER THE SECTION CORRESPONDING TO “PRIVACY NOTICE”, HEREINAFTER REFERRED TO AS THE “WEB PAGE” PROPERTY OF ARGUILEA, YOU (THE “OWNER”) STATE HEREBY YOU ARE UNDERSTANDING AND ACCEPTING THE TERMS AND CONDITIONS STATED HEREIN AND YOU STATE AND EXPRESSLY GRANT HEREBY YOUR ACCEPTANCE AND AUTHORIZATION BY USING ELECTRONIC MEANS FOR SUCH PURPOSE, PURSUANT TO THE PROVISIONS OF ARTICLE 1803 OF THE FEDERAL CIVIL CODE.**

**1.3.- IF OWNER DOES NOT ABSOLUTELY AND FULLY ACCEPTS THE TERMS AND CONDITIONS OF THIS NOTICE, OWNER SHALL REFRAIN FROM SHARING ANY KIND OF INFORMATION WITH ARGUILEA BY EANY MEANS INCLUDING ITS WEB PAGE.**

**1.4.- IF OWNER CONTINUES USING THE WEB PAGE OF ARGUILEA, WHETHER FULLY OR PARTIALLY, SUCH ACTION SHALL BE CONSIDERED AS ITS ABSOLUTE AND EXPRESS ACCEPTANCE TO THE TERMS AND CONDITIONS STATED HEREIN.**



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**1.5.-** BY USING THE WEB PAGE OF **ARGUILEA**, OWNERS ARE GRANTED WITH THE CAPACITY AS OWNERS (HEREINAFTER REFERRED TO AS THE “OWNER” OR THE “OWNERS”) AND IT IMPLIES FULL AND UNCONDITIONAL ACCEPTANCE OF ALL AND EVERY OF THE GENERAL AND SPECIFIC CONDITIONS INCLUDED HEREIN IN THE VERSION PUBLISHED BY **ARGUILEA**, UPON ACCESS BY OWNER TO THE AFOREMENTIONED WEB PAGE.

PARTIES HEREIN STATE THAT SINCE THERE IS NO ERROR, FRAUD, BAD FAITH OR ANY OTHER DEFECT THAT MAY RENDER THIS INSTRUMENT NULL, BOTH PARTIES HEREIN AGREE TO BE SUBJECT TO THE FOLLOWING:

### 2.- Definitions

**2.1.- Personal Data.** Any information related to an identified or identifiable individual.

**2.2.- Sensitive Personal Data.** That personal data affecting the closest rights of the OWNER or which undue use may give rise to discrimination or imply a serious risk for OWNER. Particularly, sensitive data is considered data that may disclose aspects such as racial or ethnic origin, current or future health condition, genetic information, religious, philosophic and moral beliefs, union registration, political opinions, sexual preference.

**2.3.- Owner.-** Individual (OWNER) to whom personal data identify or correspond

**2.4.- Responsible Party.** Individual or private company (**ARGUILEA**) deciding on the management of personal data

**2.5.- Person in Charge.** Individual or company managing personal data by itself or along with others on behalf of the Responsible Party.

**2.6.- Management.** Obtaining, use (including access, management, use, transfer or disposal of personal data), disclosure or storage of Personal Data in any means.

**2.6.1.- Transfer.** All communication of personal data made to a person other than the Responsible Party or Person in Charge of the management.

**2.6.2.- Submission.** Communication of personal data between the Responsible Party and the Person in Charge inside or outside the Mexican territory.



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**2.7.- Third Party.** National or foreign individual or company other than the owner or the Responsible Party of the personal data.

**2.8.- ARCO Rights.** Access, Rectification, Cancellation and Opposition Rights.

**2.9.- Implied Authorization.-** It shall be considered that OWNER has accepted management of data if it does not oppose to the terms of the Privacy Notice when made available to it.

**2.10.- Primary Purposes.-** Purposes for which personal data is mainly requested and reason why the relation between **ARGUILEA** and OWNER gives rise

**2.11.- Secondary Purposes.-** Purposes not essential for the relation between **ARGUILEA** and OWNER but that its management contributes to the performance of the corporate purpose of **ARGUILEA**.

### 3.- Identity and domicile of Responsible Party managing personal data

**3.1.-** Responsible Party for the management of the personal data of OWNERS is ARGUILEA, S.C. (hereinafter referred to as **ARGUILEA**), bound to respect the provisions of this Privacy Notice (hereinafter equally referred to as the “Notice” or the “Privacy Notice” ) made available to OWNER in compliance with the provisions of the Federal law of Personal Data Protection held by Third Parties (hereinafter equally referred to as the “Law” or “LFPDPPP” for its initials in Spanish) and applicable regarding the personal data of individuals such as candidates, employees, clients and/or clients prospects, vendors and/or vendors prospects and visitors to the offices and facilities of **ARGUILEA** and users of the WEB PAGE OF **ARGUILEA** which **ARGUILEA** manages due to the rendering of comprehensive services and support for solutions for the food industry and promotional articles that **ARGUILEA** makes, which target is the public related to the food industry in any part of the production chain in the United Mexican States, United States of America, Argentina and Brazil in Spanish, English and Portuguese.

**3.2.-** Domicile of **ARGUILEA** stated for the purposes hereof is the domicile located at calle Acueducto Remedios No. 102, colonia Vista del Valle, Naucalpan, Zip Code 53290, State of Mexico, Mexico.

### 4.- Managed personal data



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**4.1.- OWNER** acknowledges and accepts that **ARGUILEA** may directly and/or through parties in charge, manage the following personal data as a result from the relation with each OWNER:

**4.1.1.- Candidates:** *General information: Full name, age, nationality, marital status, profession, official ID with photograph, domicile (street, external and internal number, suburb, zip code, political district or municipality) fixed or mobile phone, e-mail address, CURP (Sole Population Code), social security number. Academic information: level of Family data: name, age, school level, telephone number, activity of parents, brothers and sisters, children and/or spouse. Professional experience: name of company, time during which he/she rendered his/her services, address, telephone number, position held, reason to leave the job, name of his/her immediate boss. Personal and work references (that OWNER assures to have with the authorization to share personal data of such third parties with ARGUILEA): full name, domicile, telephone, profession.*

*Copies of documentation: Official ID with photograph, birth certificate, Curriculum Vitae, CURP (sole population code) registry, address receipt, social security receipt, certificate of studies.*

**4.1.2.- Workers:** *General information: Full name, age, nationality, marital status, profession, official ID with photograph, domicile (street external and internal number, suburb, zip code, political district or municipality), fixed or mobile phone, e-mail address, social security number, CURP (sole population code). Academic information: level of studies. Relatives' data: name, age, school level, telephone number, relatives' profession, brothers and sisters, children and/or spouse. Patrimony and/or financial data: bank account data (account number, CLABE, bank). Professional experience: name of company, time during which he/she rendered his/her services, address, telephone number, position held, reason to leave the company, name of immediate boss. Personal and work references (which OWNER assures to have with the authorization to share personal data of such third parties with ARGUILEA): full name, domicile, telephone number, profession.*

*Copies of documentation: Official ID with photograph, birth certificate, Curriculum Vitae, CURP certificate, social security receipt, domicile receipt, certificate of studies.*

Likewise, **ARGUILEA** states it may manage sensitive personal data of OWNER-Worker and its former and current health condition and its medical background to find out if OWNER-Worker is or was infected by the disease identified as COVID-19 and implement prevention and/or protection actions regarding the other OWNERS, and, pursuant to the provisions of Article 9 of the LFPDPPP, express written and signed authorization shall be requested from OWNER-Worker for its management by means of the corresponding forms.



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In addition, **ARGUILEA** may request the health condition of the family members of OWNER-Worker to find out if they are or were infected by the disease identified as COVID-19 and implement prevention and/or protection actions regarding the other OWNERS.

If OWNER-Worker shares with **ARGUILEA** the health condition of some of his/her family members that may have been infected by the disease identified as COVID-19, such OWNER states under signature it has the express authorization from such family members to share their sensitive personal data with **ARGUILEA** and in those cases that such family members are minors, that it has the express authorization from their parents, guardians and/or representatives to share their health data with **ARGUILEA**; therefore, it shall be bound to keep **ARGUILEA** harmless from any controversy caused by the unauthorized use of personal data of third parties.

**4.1.3.- Clients and/or Clients prospects: Full name, nationality, domicile (Street, number, suburb, city, state, political district or municipality, zip code) fixed and/or mobile telephone number, e-mail address, Tax ID, CURP, bank data (account number, CLABE, bank), billing data and domicile (street, number, suburb, city, state, political district or municipality, zip code).**

**Copies of documentation: official ID with photograph, Tax ID certificate, domicile receipt.**

If OWNER hires the services offered by **INVEZT** so that the beneficiary and/or user of such services is a third party, such OWNER shall previously obtain its authorization before providing its personal data to **ARGUILEA**, thus it is bound to keep **ARGUILEA** harmless from any controversy resulting from the unauthorized use of personal data of third parties. If the third party is a minor pursuant to the applicable Mexican rules and regulations, OWNER states under affirmation to have sufficient capacities to provide their personal data to **ARGUILEA** and accept this Privacy Notice, thus being bound to keep **ARGUILEA** harmless from any controversy resulting from the unauthorized use of personal data of third parties and minors.

**4.1.4.- Vendors, Vendors' Prospects and/or Service Providers: Full name, domicile (zip code, state, country, city or municipality, suburb, locality, street, external and internal number), fixed and/or mobile telephone number, e-mail address, Tax ID, bank data (bank's name, account, CLABE, SWIFT, ABBA, in case of international transfers), tax data, name of legal representative of the company, articles of incorporation of the company, power-of-attorney of the legal representative registered in the Public Real Estate and Commercial Registry, contact data and positions in the company, billing data and domicile (zip code, state, country, city or municipality, suburb, locality, street, external and internal number), e-billing.**



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*Copies of documentation: Official ID with photograph, Tax ID certificate, Articles of Incorporation of the company, power-of-attorney of the legal representative registered in the Public Real Estate and Commercial Registry.*

*4.1.5.- OWNER–Visitor to the offices or facilities of ARGUILEA: Full name, official ID with photograph, image or photograph, signature, name of person to be visited in ARGUILEA.*

*4.1.6.- User of ARGUILEA's WEB PAGE: Full name, e-mail address, mobile telephone number, name of user of the social network of LinkedIn®.*

4.2.- OWNER grants hereby its express authorization pursuant to the provisions of Article 8 of the LFPDPPP, for ARGUILEA to manage its personal data, including those denominated financial and/or patrimony personal data stated in this clause to comply with the purpose of this Privacy Notice.

4.3.- OWNER accepts hereby and states under affirmation that the personal data it has provided to ARGUILEA is true, current and correct. In addition, it is bound hereby to keep ARGUILEA harmless from any claim or complaint resulting from errors in the data it has provided to it.

4.4.- Likewise, ARGUILEA represents herein it shall not manage any kind of personal data of minors pursuant to the applicable Mexican rules and regulations.

4.5.- ARGUILEA represents hereby it may obtain personal data of OWNER by means of public access sources to validate and update OWNER's data, respecting at all times the reasonable expectation of privacy referred to in Article 7 of the LFPDPPP.

4.6.- ARGUILEA shall use IP information (Internet Protocol) to analyze any kind of threat to ARGUILEA's WEB PAGE and to collect demographic information. However, IP information shall not be used under any circumstance to identify OWNERS, except when there is a probability of fraudulent activities.

### **5.- Purposes of the management of personal data**

5.1.- ARGUILEA accepts and acknowledges it may directly and/or through Persons in Charge manage OWNER's personal data, according to the type of relation it has with OWNER for the following **primary purposes**:



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### 5.1.1.- OWNER –*Candidate*:

- a) Contact OWNER–*Candidate* by phone, e-mail address, fixed or mobile telephone number or in any other means to monitor and evaluate the experience and studies of OWNER–*Candidate*, to find out the possibility of being selected and the success possibilities for the position he/she intends to perform.
- b) Find out the labor experience of OWNER–*Candidate* and his/her skills for the position he/she intends to hold.
- c) Make a physical and electronic file of OWNER–*Candidate* kept in the domicile of **ARGUILEA** during the selection and hiring process and for **1-one month** after the completion of such process.
- d) Contact individuals OWNER–*Candidate* has indicated as personal and/or labor references.

### 5.1.2.- OWNER–*Employee*:

- a) Make a physical and/or digital file of OWNER–*Employee* kept in the domicile of **ARGUILEA** throughout the term of the labor relation and during **5-five years** after such relation is terminated due to any reason.
- b) Execute the necessary formalities to obtain a debit card to deposit the salary and/or commissions and other benefits of OWNER–*Employee*.
- c) Keep attendance and check-in and check-out records to the work place of OWNER–*Employee* in **ARGUILEA**.
- d) Drafting of letters of assignment of work tools required by OWNER–*Employee* for the performance of his/her labor activities.
- e) Make the necessary registration, cancellation formalities, modifications and disabilities before the Mexican Institute of Social Security (IMSS *for its initials in Spanish*) and other necessary government institutions.
- f) **ARGUILEA** may manage sensitive personal data of OWNER–*Employee* such as his/her former and current health condition and his/her medical background and/or health data of his/her family members to find out if OWNER–*Employee* and/or his/her family members are or were affected by the disease identified as COVID-19 and establish prevention and/or



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protection actions regarding the other OWNERS. This sensitive personal data shall be kept by **ARGUILEA** for a term of **6-six months** as from it was obtained.

### **5.1.3.- OWNER–*Client* and/or *Client Prospect*:**

a) Contact OWNER–*Client* by telephone, e-mail, social networks or any other means to assist and monitor the requests of products and/or services offered by **ARGUILEA**.

b) Provide OWNER–*Client* with the services commercialized by **ARGUILEA** pursuant to requests made in any means so that OWNER–*Client* may be benefitted from the offered services and/or products.

c) Contact OWNER–*Client* by any means to make clarifications and monitor of payments or any other situation resulting from the products and/or services provided by **ARGUILEA** such as claims or comments thereon.

d) Register and update data in the internal company administration service for the access of personal data by the persons authorized for such purpose.

e) Contact OWNER–*Client* to manage and collect outstanding balances; if applicable, contact the persons OWNER–*Client* has authorized as payment contacts.

f) Make and keep a physical and/or electronic file of OWNER–*Client* during the term of the commercial relation and up to **10-ten years** after the expiration/termination of the commercial relation.

g) Preparation of an electronic invoice and credit notes resulting from the products or services commercialized by **ARGUILEA**. Such invoices, both physical and electronic, and the credit notes shall be kept by **ARGUILEA** during the term of the commercial relations and for **10-ten years** after the termination thereof.

h) Coordinate meetings with OWNER–*Client* by telephone, e-mail address, social networks, Skype or in any other means on a physical or digital support.

### **5.1.4.- OWNER–*Vendor* and/or *Vendor's Prospect* and/or *Service Provider*:**

a) Contact OWNER–*Vendor* by telephone, e-mail address or by any other means to request or monitor the information, service and/or products requests required by **ARGUILEA**.



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- b) Register Vendor's profile in the internal administration service to provide access to the authorized personnel that shall be kept during the time of the commercial relation and for **10-years** after.
- c) Keep e-invoices and credit notes for a period of up to **10-ten years** as from generation of e-invoices and credit notes in a physical and electronic format, resulting from the products and/or services required by **ARGUILEA**.
- d) Keep the agreements **ARGUILEA** executes with OWNER-*Vendor* both in a physical and electronic form once they are expired for a period of **10-ten years**.
- e) Make bank transfers as a result from the requests of products and/or services made by **ARGUILEA**.
- f) Keep a physical and/or electronic file of OWNER-*Vendor* during the term of the commercial relation and up to **10-ten years** after its expiration/termination due to any reason
- g) Register them in its accounting system for access to personal data by the persons authorized accordingly.

### **5.1.5.- OWNER-*Visitor* of ARGUILEA's offices and facilities:**

- a) Store the image and the information of visitors to **ARGUILEA's** offices and facilities in different image databases, to keep a record of entries and outs of those visiting its facilities and this is part of the security actions adopted in the facilities. Images of OWNER-*Visitor* shall be kept for a term of **6-six months**, as from the date on which they were obtained. Other personal data shall be kept for a term of **6-six months**, as from the date on which it was obtained.

### **5.1.6.- OWNER-*User* of ARGUILEA's web page:**

- a) Contact OWNER-*User* on the telephone, by e-mail address, social networks, Skype or by any other means to attend and follow up its comments or requests made through **ARGUILEA's WEB PAGE**.
- b) To access social networks in which **ARGUILEA** participates.
- c) Personal data of OWNER-*User* shall be kept by **ARGUILEA** for a term of 1-one year as from it was obtained.



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**5.2.- ARGUILEA** may manage personal data of OWNER for the following **secondary purposes**:

- a) In case of OWNER-*Client*, evaluate the quality of the offered services and the quality of attention to its comments or requests.
- b) Provide it with additional communications, information and promotions, launching of new products, changes of image, bulletins and news.
- c) Report via e-mail about changes or new products or services related to those requested by OWNER.

**5.3.-** If OWNER does not intend its personal data is used for all or some of the Secondary Purposes stated in item 5.2., it shall send a deletion request of its data specifying the secondary purposes it refuses to accept, to the following e-mail address: [privacidad@arguilea.com](mailto:privacidad@arguilea.com).

### 6.- Use of “Cookies” and “web beacons”

**6.1.-** It is possible that the **ARGUILEA’s** WEB PAGE uses "cookies" in connection with certain characteristics or functions. Cookies are specific types of information that a web site transmits to the hard disc of OWNER’s computer to keep records. Cookies may be used to facilitate the use of a web site upon keeping passwords and preferences while OWNER navigates in Internet. **ARGUILEA’s** WEB PAGE does not use cookies to obtain personal identification data from OWNER’s computer not originally sent as part of the cookie.

**6.2.-** In turn, the “web beacons” are images embedded in a web page or e-mail that may be used to monitor the behavior of a visitor, such as keeping information on the IP address of user, duration of interaction in such page and the type of navigator used, among others.

**6.3.-** Although most of the navigators automatically accept cookies and web beacons, OWNER may configure its navigator not to accept them.

**6.4.-** Following instructions must be followed to deactivate cookies:

**6.4.1.-** Open the search engine in a PC, enter the menu “Tools”, enter the “Internet Options”, select the tab “Privacy”, move the Configure cursor to “Block all Cookies”.



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6.4.2.- Open internet in a Mac, go to “Preferences”, select the option “Security”, select “Never” in the “Accept Cookies” option”.

### 7.- Limitations for access and disclosure of personal data

7.1.- **ARGUILEA** is bound hereby to make its best efforts to protect the security of the personal data that OWNER provides it with by means of the execution of legal actions, use of access control technologies, unauthorized use or disclosure of personal information and the encryption of personal data being managed and use of SSL certificates in **ARGUILEA**’s WEB PAGE; personal information is kept for such purpose in databases with limited access located in facilities controlled by security mechanisms such as surveillance systems 24 hours and alarm systems for unauthorized access to facilities; **ARGUILEA** is bound hereby that the information provided by OWNER is considered as confidential and used under full privacy.

7.2.- Therefore, **ARGUILEA** is bound to take the necessary actions to guarantee that the Parties in Charge it uses, comply with the provisions of this Privacy Notice, with the obligations under its responsibility and particularly, with the provisions provided in Article 50 of the Regulation of the LFPDPPP.

7.3.- Likewise, **ARGUILEA** is bound to hire computer services in the cloud that execute the management of personal data of OWNERS, provided they respect the provisions of Article 52 of the Regulation of the LFPDPPP.

7.4.- In addition, **ARGUILEA** informs OWNER that, to prevent receiving general advertising, it may make its registration in the Public Registry to prevent Advertising; for further information, it may review the web site of the Federal Consumer’s Protection Agency (PROFECO *for its initials in Spanish*) and in addition, another way in which the management of its personal data may be limited is the Public Registry of Users that the National Commission for Defense of Users of Financial Services (CONDUSEF *for its initials in Spanish*) has.

7.5.- Notwithstanding the above and, if security breaches occur in any stage of the management significantly affecting the patrimony or moral rights of OWNERS, they shall be immediately informed by e-mail address to take the corresponding actions for the defense of their rights and they shall exempt **ARGUILEA** from any responsibility if breaching is not attributable to them.



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### 8.- Designated person to proceed requests

**8.1.-** If OWNER intends to revoke its authorization and Access, Rectify, Cancel or Oppose to the management of the personal data it has provided, it should do it by means of the person designated by **ARGUILEA**, which data is described hereinbelow:

Designated Person: **Process and Security System Management.**

E-mail address: **[privacidad@arguilea.com](mailto:privacidad@arguilea.com)**.

### 9.- Means to revoke authorizations

OWNER of personal data may revoke the authorization granted by the acceptance of this Privacy Notice. Such revocation of the authorization it grants by electronic means shall be made executing the following proceeding using the following [format](#):

**9.1.-** Such form, scanned and legible shall be completed, executed and returned to the e-mail address of the Designated Person indicated in item 8.1. of this Privacy Notice, so that **ARGUILEA** may evaluate if OWNER complies with the requirements provided for the revocation of its authorization.

**9.2.-** Along with such form, OWNER shall state and enclose the following documentation:

**9.2.1.-** Full name of OWNER, domicile and e-mail address to receive response to its request:

**9.2.2.-** Grounds of its request;

**9.2.3.-** Arguments supporting its request;

**9.2.4.-** Official document in force evidencing its identity and evidencing he/she is the person he/she claims to be. The following shall be considered as official documents to evidence his/her identity: i) card issued by the Federal Elections Institute; ii) Passport issued by the Ministry of Foreign Affairs; iii) National Military Service Card; or iv) Professional license.

In those cases in which OWNER asserts its right to revoke its authorization by means of its legal representative, in addition of evidencing the identity of OWNER pursuant to the



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provisions of the above-stated paragraph, such legal representative must also evidence its identity with one of the official documents indicated in the above-stated section. Likewise, a legible simple copy of the power-of-attorney granted by OWNER to the legal representative or, as applicable, a legible simple copy of the power-of-attorney signed by the OWNER before two witnesses or statement by appearance of OWNER by means of which capacities are granted to execute this proceeding before **ARGUILEA** must be enclosed thereto.

**9.2.5.-** Date as from which revocation of authorization is effective.

**9.3.- ARGUILEA** shall notify OWNER, in a maximum term of 20-twenty days, as from the date on which it received the request to revoke authorization, the resolution thereto so that, if admissible, it becomes effective during the 15-fifteen days following to the date on which response is provided by means of a message stating it has executed all actions not to manage personal data of OWNER.

### **10.- Means to assert ARCO rights**

**10.1.-** If OWNER needs to access, rectify, cancel or oppose to the management of personal data it has provided to **ARGUILEA**, OWNER shall follow the proceeding hereinbelow using the request [form](#):

**10.2.-** Such scanned and legible form shall be filled in, signed and returned to the e-mail address of the Designated person indicated in item 8.1. hereof, so that **ARGUILEA** may evaluate if OWNER complies with the requirements for asserting its ARCO.

Along with such form, OWNER shall state and enclose the following documentation:

**10.2.1.-** OWNER's full name, domicile and e-mail address to receive the response to its request;

**10.2.2.-** Reasons of its request;

**10.2.3.-** Arguments supporting its request or petition;

**10.2.4.-** Official document in force evidencing its identity and evidencing it is the person it claims to be. The following shall be considered as official documentation to evidence its identity for such purpose: i) card issued by the Federal Elections Institute; ii) Passport issued by the Ministry of Foreign Affairs; iii) National Military Service Card; or iv) professional license.



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In those cases in which OWNER asserts its ARCO rights by means of its legal representative, in addition of evidencing the identity of OWNER pursuant to the provisions of the above-stated paragraph, such legal representative shall also evidence its identity with some of the official documents stated in the above-mentioned paragraph. Likewise, a legible copy of the power-of-attorney granted by OWNER to the legal representative must be enclosed, or as applicable, a legible copy of the power-of-attorney signed by OWNER before two witnesses or statement by appearance of OWNER granting it with capacities to make this proceeding with ARGUILEA.

**10.2.5.-** Clear and accurate description of personal data regarding which it is intended to assert ARCO rights and any other element or document facilitating the location of personal data.

**10.2.6.-** In case of rectification of personal data requests, OWNER shall indicate, in addition to the above, modifications to be made and provide the documentation support its request.

**10.3.-** ARGUILEA shall notify OWNER, in a maximum term of 20-twenty days as from the date on which it received the request of access, rectification, cancelation or opposition, the resolution so that if admissible, it becomes effective during the 15-fifteen days following to the date on which the answer is notified. In case of requests of access to personal data, it shall be admissible prior evidence of the identity of requesting party or legal representative, as applicable.

### 11.- Transfer of personal data

**11.1.-** ARGUILEA is bound not to transfer or share personal data referred to in this Privacy Notice in favor of third parties, except if necessary to comply with the purpose of this Privacy Notice, or else, if necessary to comply with a writ from the authority.

**11.2.-** Likewise, in compliance with its obligations and with informative purposes, it is reported to OWNER that ARGUILEA may make the following transfers of personal data:

**11.2.1.-** IMSS (*Social Security*), INFONAVIT (*National Dwelling Institute for Workers*) and SAT (*Tax Administration Service*), to comply with the labor legislation, social security law and payment of taxes.



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**11.2.2.-** Banking institutions to make collection or payment of products or services or payment of workers' salaries required or offered by **ARGUILEA** to its clients, vendors and workers.

**11.2.3.-** To commercial partners and/or business partners and/or companies of the same group to which **ARGUILEA** belongs.

### 12.- Modifications

**12.1.-** Parties herein agree that the Privacy Notice may be timely and duly modified by **ARGUILEA** when it deems it convenient considering the analysis and regulations on personal data protection matter that may arise; therefore, it is bound to keep this Privacy Notice updated, it may be verified in **ARGUILEA's** WEB PAGE so that, **OWNER**, if applicable, may assert its ARCO rights.

### 13.- Guarantee authority

**13.1.-** If **OWNER** considers its right to protection of its personal data has been infringed by an action or omission by **ARGUILEA**, or it assumes an infringement to the provisions provided by the Federal Law of Protection to Personal Data held by Third Parties, its Regulation and other applicable ordinances, it may bring its disagreement or denounce before the National Institute of Transparency, Access to Information and Personal Data Protection (INAI *for its initials in Spanish*). For further information, we suggest visiting the official web page [www.inai.org.mx](http://www.inai.org.mx).

### 14.- Applicable Law and Jurisdiction

**14.1.-** Parties herein state that this Privacy Notice shall be ruled by the legal applicable provisions in the Mexican Republic, especially by the provisions of the Federal Law of Personal Data Protection held by Third Parties, its Regulation and the other related applicable rules and regulations.

**14.2.-** In case a dispute or controversy arises resulting from the interpretation, execution or performance of this Privacy Notice or from any document resulting herefrom or related hereto, parties herein shall amicably look for an agreement during a term of 30-thirty calendar



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days as from the date on which such difference arises and the counterparty is notified in writing about such event; referring the negotiation proceeding to the Alternative Justice Center for Mexico City, formerly Federal District, pursuant to the protection of the Alternative Justice Law of the Superior Court of Justice for Mexico City, formerly Federal District and its Internal Regulation, in force when the corresponding controversy is brought.

**14.3.-** If the parties do not reach an agreement, they agree hereby to subject all the discrepancies resulting from this Privacy Notice or from any document resulting herefrom or related hereto or to thereto, to be definitively settled according to the competence and laws of the Federal Administrative Authorities or Courts for Mexico City, formerly Federal District, thus expressly waiving to any other jurisdiction that may correspond to them due to their current or future domiciles.

*Version 2.0 [Updating date March/18/2021]*

### LEGEND REQUEST OF EXPRESS AUTHORIZATION FOR MANAGEMENT OF SENSITIVE PERSONAL DATA

☐ I agree and I expressly authorize in writing that my personal sensitive data such as my former and current health condition is managed by **ARGUILEA, S.C.** pursuant to the provisions of this Privacy Notice; therefore, I sign this authorization, accordingly.

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Name and signature of OWNER

Date: