

Privacy Notice

Important: The present privacy notice shall remain valid and shall be exercised when the Complainants made reports through our whistleblower ethical system, always and when they share with us their personal data.

1. RESPONSIBLE FOR THE PROTECTION OF YOUR PERSONAL DATA

EthicsGlobal (hereinafter the "Company"), domiciled in World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Napoles, Benito Juarez, ZIP Code 03810, is responsible for the processing of your data and commits to ensure the privacy of the personal information obtained through its services offered through the whistleblower ethical system and other means permitted by law. However, it is suggested to read the regulation described below to understand the treatment of the data provided.

How to contact us:

- Certified Information Systems Security Officer: Javier Flores
- Address: World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Napoles, Benito Juarez, ZIP Code 03810
- Email: jflores@ethicsglobal.com
- Phone: 55 52-61-78-78

2. FOR WHAT PURPOSES DO WE COLLECT AND USE YOUR PERSONAL DATA?

Your personal data will be used for the following purposes:

- In order to facilitate the investigation process of a complaint made through the whistleblower ethical system provided by EthicsGlobal.
- To collect more information as evidence or testimony of a report generated through the whistleblower ethical system provided by EthicsGlobal.
- To contact you and send you relevant information regarding the report that was generated through the whistleblower ethical system provided by EthicsGlobal.

3. WHAT PERSONAL DATA WILL BE OBTAIN AND FROM WHERE?

The media offered by EthicsGlobal: the free line 01 800 04 ETHICS (38422) in México (and the numbers 01 800 of vanity according to the specifications of each client), the Internet sites with sub-domain EthicsGlobal and those sites of our clients with its own Domain, the e-mail addresses requested by our clients, the information

compiled via chat or through the mobile APP or our SMS Channel, as all the information sent to the World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Naples, Benito Juarez, ZIP Code 03810, constitute the communication channels designed to facilitate the reception, process, send report, exchange and/or responses of irregular situations which occur in companies which are clients of EthicsGlobal.

Below, we detail the guidelines of the Privacy Policy that governs these means. The entry of personal data of the user through the indicated means and the express acceptance of this Privacy Policy, constitute a necessary requirement to facilitate user contact by EthicsGlobal customers, so that the clients themselves initiate an investigation and give their corresponding answer to their report or complaint through the indicated means provided by the whistleblower ethical system from EthicsGlobal.

The user who decides to provide their personal data states that they know and accept following:

a) The recipients of the personal data are exclusively the clients of EthicsGlobal, who will be able to use them in order to carry out the research and relevant reports, develop general statistics, without identifying the user, make inquiries or communicate with him, all this, without prejudice to the power of EthicsGlobal to preserve the personal data of the user exclusively for the purposes statistical EthicsGlobal will not be responsible for the course that its clients give to the complaint made by the user or the consequences that such procedure could have for the user, the person object of his complaint or for any third party interested. In this regard, the complainant states that (i) there is no legal relationship Anyone who links him to EthicsGlobal, who is limited to making available to the customer your clients the complaint, information, documentation and / or personal data that the user report and / or provide through any of the means offered by EthicsGlobal. (ii) The personal data will be incorporated into the EthicsGlobal database, with its EthicsGlobal responsible, with address at World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Naples, Benito Juarez, ZIP Code 03810 (iii) The user guarantees and responds in any case for the veracity, accuracy, validity, authenticity and certainty of the data personnel that enters the media offered by EthicsGlobal (see first paragraph), so that assumes the corresponding responsibility in case they turn out to be inaccurate EthicsGlobal does not assume any responsibility in the case of inaccuracy of any of the data entered by the user in the media offered by EthicsGlobal. (iv) The user accepts and gives his free, express and informed consent for such data to be used for the purposes mentioned above, and authorizes that they are treated, stored, collected or assigned.

The transfer of the personal data of the users will be exclusively carried out for the clients of EthicsGlobal, and will have exclusively as an aim that the clients themselves initiate an investigation, request an extension of the complaint filed with the user and / or perform the questions or clarifications that they consider pertinent,

and give you the answer corresponding to the report or complaint through the indicated means that EthicsGlobal makes available to its customers. (v) Regarding the transfer of personal data, EthicsGlobal undertakes to include in its agreements with its customers the obligation to respect the provisions of the personal data protection rules in force in the United Mexican States, this Privacy Policy, as well as all EthicsGlobal complies with the protection of privacy, security and confidentiality of information. (vi) The user who enters their personal data may, at any time and in exercise of the rights conferred by the Federal Law of Protection of Personal Data in Possession of Individuals.

a) The personal data that ETHICSGLOBAL obtains and obtains by any means coming from you, they can be, among others:

- First name
- Sex
- Home
- Email
- Landline and / or mobile phone
- R.F.C.
- Market Stall
- Employee number

All personal data that the user voluntarily enters and provides to ETHICSGLOBAL by any means, will be subject to security and privacy regulations established in this document.

The information requested will allow us to contact you when necessary. The users They can be contacted by phone, email or by any other means or personally in case it is required.

b) The personal data that we collect through OTHER SOURCES

We may obtain information from you from other sources permitted by law. Sayings Data can be, among others:

- First name
- Sex • Email
- Phone
- Age
- Civil status
- R.F.C.

4. HOW CAN YOU LIMIT THE USE OR DISCLOSURE OF YOUR PERSONAL DATA?

The personal data provided by the user will be part of a file that will contain your profile, which may be modified by the owner at any previous time accreditation or identification, or where appropriate by means of the corresponding password or password. The user is advised to update their data regularly. To limit the use of your personal data you can contact our Certified Information Systems Security Officer by email jflores@ethicsglobal.com or call 52617878.

5. HOW TO ACCESS OR RECTIFY YOUR PERSONAL DATA OR CANCEL OR OPPOSING ITS USE?

You have the right to access your personal data that we possess and the details of their treatment, as well as to rectify them if they are inaccurate or incomplete, cancel them when you consider that it is not required for any of the purposes indicated in this privacy notice, are being used to purposes not consented or the contractual or service relationship has ended, or, Oppose the treatment of them for specific purposes, these rights in together, they are called ARCO Rights.

Any owner of personal data, like you, or where appropriate, your legal representative, can exercise any of the rights to access, or rectify your personal data or cancel or oppose their use, cancellation or opposition to companies that have them in their databases.

It is important to keep in mind that the exercise of each of these rights is independent of each other, that is, it is not necessary to exhaust one to exercise any of the three others.

- Procedure to Access, or Rectify your Personal Data or Cancel or Oppose its Use. (As of January 6, 2012)

The mechanisms that have been implemented for the exercise of said ARCO rights are through the presentation of the respective request in writing, before our Area Manager of Protection of Personal Data, at the Address: World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Napoles, Benito Juarez, ZIP Code 03810, or by sending your request to our Certified Information Systems Security Officer email: jflores@ethicsglobal.com

Once the application is submitted, (format that you can request from our Certified Information Systems Security Officer by email: jflores@ethicsglobal.com, has a deadline maximum of 20 business days to respond, and 15 business days more to make effective the exercise of the right that it requested, in case of that is appropriate. The terms may be extended once and for a period same when there are facts that justify it.

ETHICSGLOBAL may refuse in whole or in part to allow the access, or to make the rectification or cancellation of the data personal rights, or to grant the opposition to their treatment when:

1. The applicant is not the owner of the personal data, or the representative is not duly accredited.
2. The natural person or company does not have in its possession the personal information
3. Personal data of a third party is injured.
4. There is a legal impediment or resolution of competent authority that restricts the exercise of any of the ARCO rights.
5. The rectification, cancellation and opposition requested have previously been made.
6. When the contractual rights of ETHICSGLOBAL AND ITS COMMERCIAL PARTNERS ETHICSGLOBAL must communicate and justify when update any of the above assumptions and cannot lead to out the action that was requested

The delivery of the data will be free; the owner must cover only the justified shipping costs or the cost of reproduction in copies or other formats. However, if the same person reiterates his request in a period of less than twelve months, costs will not be greater than three days of General Minimum Wage Valid in the Federal District, unless there are modifications to the privacy notice that motivate new inquiries.

• **Your request must contain the following information:**

The petition must be submitted at the address indicated above, or Well, via email to the aforementioned e-mail. The application must contain the following information:

1. Your name and address or means to receive communications.
2. Your identification or documents that certify the personality of your legal representative.
3. Specify the data you want to access or rectify or cancel or oppose their use, as the case may be, as well as any document that justifies the rectification, or,
4. Any other element or document that facilitates the location of your personal data.

• **The deadlines to meet your request are the following:**

Once the application is submitted, ETHICSGLOBAL has a maximum term of 20 business days to respond, and 15 business days more to make effective the exercise of the right that you request, in if it is appropriate. The terms may be extended once and for a period same when there are facts that justify it.

To know the procedures, requirements and deadlines, you can contact Our Certified Information Systems Security Officer by email jflores@ethicsglobal.com, or call 52617878, or request reports in the address located at World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Napoles, Benito Juarez, ZIP Code 03810.

6. HOW CAN YOUR CONSENT FOR YOUR TREATMENT BE REVOKED? OF YOUR DATA?

At any time, you may revoke the consent you have given us for the treatment of your personal data, so that we stop using them.

- **Procedure to revoke your consent. (as of January 6, 2012)**

For this, it is necessary that you submit your request in writing to our Charge Personal Data Protection Area, at the Address: located at World Trade Center, Montecito 38, Floor 42 Office 1, Neighborhood. Napoles, Benito Juarez, ZIP Code 03810 or by sending your request to our Certified Information Systems Security Officer by email jflores@ethicsglobal.com. Once the application is submitted, EthicsGlobal account with a maximum term of 20 business days to respond, and 15 business days more to make effective the exercise of the right that requests, in case that it is pertinent.

The terms may be extended once and for a period same when there are facts that justify it.

- **Your request must be accompanied by the following information.**

For a correct attention to your request to revoke your consent for the use of your personal data shall be present at the address indicated above, or, via mail electronic mail to the e-mail before indicated the request that contains the Following data:

1. Your name and address or means to receive communications.
2. Your identification or documents that certify the personality of your legal representative.
3. Specify the data you want to revoke your consent to the treatment of them.
4. Any other element or document that facilitates the location of your personal data.

- **The deadlines to meet your request are the following:**

Once the application is submitted, THE COMPANY has a deadline maximum of 20 business days to respond, and 15 business days more to revoke your consent for the treatment of your data, in case it is appropriate. The terms may be extended once and for a period same when there are facts that justify it.

7. COOKIES AND WEB BEACONS

Cookies are text files that are downloaded automatically and stored on the hard disk of the user's computer when browsing on a website specific, which allow the Internet server to remember some information about users who access the websites provided by EthicsGlobal as part of the Ethical System of Complaints, as well as to track certain behaviors or activities.

Cookies allow users to recognize, detect the bandwidth they have selected, identify the most outstanding information, calculate the size of the audience and measure some traffic parameters. On the other hand, web beacons are images inserted in a web page or email, which can be used to monitor the behavior of a visitor, how to store information about your IP address, time length of interaction on that page and the type of browser used, among others.

We use cookies and web beacons to obtain personal information from you, such as The next:

- Understand and save user preferences for future visits,
- Track ads,
- Collect aggregate data about traffic and site interaction in order to offer better experiences of sites and tools in the future. We can also use Trusted third-party services that track this information in our name. It will not affect the users' experience

These cookies and other technologies can be disabled. To know how to do it, check the following link or email address <https://kb.benchmarkemail.com/how-do-i-enable-cookies-in-my-web-browser/>

8. TRANSFER OF PERSONAL DATA AND CONFIDENTIALITY

When the user is in any of the ethical systems provided by EthicsGlobal will share your information with THE COMPANY, unless you specify what contrary.

EthicsGlobal has no obligation to keep confidential any other information that the user provides through online bulletins and talks (chats), as well as through cookies, the above based on the terms established in the article 109 of the Federal Copyright Law and article 76 bis, section I, of the Federal Law for Protection of the Consumer.

Information may only be disseminated in special cases, such as identifying, locating or take legal action against those people who infringe the conditions of our services, cause damage or interfere with the rights of "ETHICSGLOBAL", its properties, of other users of the portal or of any person that could result harmed by those actions.

THE COMPANY WILL NOT sell, give away, facilitate or rent confidential information to third parties. If the user does not want their data to be shared, they can do without a determined service or refrain from participating in our promotions or contests.

THE COMPANY undertakes not to transfer your personal information to third parties without your consent, except for the exceptions provided in the legal ordinances.

Your personal data will be used for the purposes indicated in this notice of privacy, therefore, THE COMPANY will NOT share confidential information with third parties, except express authorization of its subscribers or when by means of an order judicial action is required to comply with certain procedural provisions.

The security and confidentiality of the data that users provide when hiring a service or buying a product online will be protected by a secure server under Secure Socket Layer (SSL) protocol, so that the data sent is they will transmit encrypted to ensure their protection. To verify that you are in a protected environment, make sure that a S in the navigation bar. Example: <https://>.

However, despite having more secure tools every day, the protection of data sent over the Internet cannot be guaranteed 100%; so a Once received, every effort will be made to safeguard the information.

If you do not express your opposition for your personal data to be transferred, we will understand that you have given your consent for it.

We promise not to transfer your personal information to third parties without your consent, except for the exceptions provided for in article 37 of the Federal Law of Protection of Personal Data in Possession of Individuals, as well as to carry out this transfer in the terms established by law.

Article 37 of the Federal Law on the Protection of Personal Data in Possession of Individuals.

Article 37.- National or international transfers of data may be carried out without the consent of the owner When one of the following assumptions occurs:

- I. When the transfer is provided for in a Law or Treaty in those that Mexico is part of;
- II. When the transfer is necessary for the prevention or medical diagnosis, health care provision, medical treatment or management of health services;

- III. When the transfer is made to companies controllers, subsidiaries or affiliates under the common control of the responsible, or to a parent company or to any company of the same group of the person in charge who operates under the same processes and internal policies;
- IV. When the transfer is necessary by virtue of a contract celebrated or to be celebrated in the interest of the owner, by the person in charge and a third;
- V. When the transfer is necessary or legally required for safeguarding a public interest, or for procuring or Justice administration;
- VI. When the transfer is accurate for recognition, exercise or defense of a right in a judicial process, and
- VII. When the transfer is accurate for the maintenance or fulfillment of a legal relationship between the responsible and the owner.

9. MODIFICATIONS TO THE PRIVACY NOTICE

ETHICSGLOBAL reserves the right to make modifications at any time or updates to this privacy notice and adapt them to new legislation, jurisprudential, internal policies or new requirements for the provision or offering our services or products.

These modifications will be available to the public through the following means: i) on our website (privacy notice section); ii) visible ads in Our branches; iii) or we will send them to the last email that we have provided.

It is the responsibility of the user to periodically read the privacy policies to be aware of these modifications.

10. WHOM CAN YOU SUBMIT YOUR COMPLAINTS AND COMPLAINTS FOR THE UNDUE TREATMENT OF YOUR PERSONAL DATA?

If you believe that your right to protection of personal data has been damaged for any conduct of our employees or our actions or there are any violations of the provisions of the Federal Data Protection Law Personal in Possession of Individuals, may file the complaint or complaint corresponding to the National Institute of Transparency, Access to Information and Protection of Personal Data (INAI), for more information visit www.ifai.org.mx. LAST UPDATE DATE 9-MAY-17