

PRIVACY NOTICE

Banco S3 Caceis México, S.A., Institución de Banca Múltiple ("S3 CACEIS"), in performance of the provisions of articles 15, 16 and 17 of the Federal Law on the Protection of Personal Information in Possession of Individuals, for articles 23 to 26 of its Regulation and Sixth to Eleventh of the Privacy Notice Guidelines, among others, notifies the Owners of the Personal Information as follows:

RESPONSIBLE

For all relevant legal purposes under the terms of the applicable regulation, Banco S3 CACEIS México, S.A., Institución de Banca Múltiple ("SE CACEIS") with address at Vasco de Quiroga, No. 3900, Torre A, Piso 20, Colonia Santa Fe Cuajimalpa, Alcaldía Cuajimalpa de Morelos, Código Postal 05348, Ciudad de México, is the person responsible for the collection, use (including any access, handling, leverage, transfer or disposal) disclosure or storage of personal information, through any means (hereinafter the "Handling") to perform the purposes hereinafter specified.

PERSONAL INFORMATION SUBJECT TO TREATMENT

S3 CACEIS may collect and Treat Personal Information that are those related or relevant to a person identified or identifiable according to the following categories: a) Identification; b) Contact; c) Economic; d) Financial; e) Academic; f) Labor; g) Location; h) Legal; and i) Relationship.

S3 CACEIS is not exempt from requesting information and documentation that it is required to under the terms of the law in matters of prevention of money laundering or of other crimes such as terrorism, bribery or corruption, without overlooking the regulation in credit matters that require payment feasibility studies.

RECEPTION CHANNELS

Personal Information may be received from the Owners verbally, written or in any other material support, for different reasons such as, as an example, visits, business, product or service offers, interviews, selection or hiring processes, clarifications, arbitration procedures, legal processes or any other reason, in the following methods:

- a) Personal: If the Owner appears at the address of S3 CACEIS indicated herein or personally has contact with the personnel from S3 CACEIS to request services, information, contacts, delivery of curriculums or to deliver or receive information or documentation in general;
- **b)** Direct: If the Owner has access to S3 CACEIS whether by telephone, internet, traditional mail, e-mail) (dprotecciond@s3caceis.com.mx) or by any other technological or electronic means;
- c) Indirect: If S3 CACEIS receives information from third parties or other type of available source or allowed by regulation or by the Owner.

PURPOSES

S3 CACEIS has as purpose of Treatment of Personal Information whether directly or indirectly; Comply with the regulation that is or might be applicable; perform or cease performing its daily operation normally or in the events of contingency; hire, modify, invoice or terminate with rendering the services, mandates, commissions; budget, estimate, analyze, purchase, sell or lease products or services; perform market studies, advertisement or



marketing activities; offer, place and/or sell financial products or services; study, modify or manage products or services that are available to the public; achieve identification or location of persons or contact or communication with them; allow access or abandonment of facilities; record, reproduce, store or eliminate images or voice; ensure security; seek, investigate, evidence, request, analyze, verify, manage or assess personal information, of identification, behavior, contact, location, relationship, labor, academic, economic, legal, financial, credit, of market or operational; prepare, study, modify, eliminate or keep graphs or statistics, polls, reports or presentation; draft, study, modify or notify agreements or any other type of communication or legal documentation or not; create, provide, modify or promote benefits or discounts; comply with requirements, regulatory or from competent authorities, of persons from the public or private sector including self-regulatory bodies; provide attention, follow-up and/or conclusion to judicial or extrajudicial procedures, arbitration or administrative related to the Owner or third parties; perform judicial or extrajudicial collection; record, keep or destroy information or documentation; arrange, perform or assess interviews, selection or hiring processes; make invitations and/or coordinate or organize educational, social, ecological, cultural or charity events; comprise files or update them; perform, record, assess or provide training or updates; hire, coordinate, verify or address advisories, reviews or internal or external audits in different specialties such as legal, tax and/or regulatory.

According to the Federal Law on the Protection of Personal Information, the Person Responsible may Treat the Personal Information for compatible or analogous purposes to those mentioned above.

In addition to the purposes of Treatment of Personal Information of any individual mentioned in the previous paragraph, there are purposes from specific persons addressing to their profile:

VISITORS: The purposes for Treatment of Personal Information is mainly to identify the person in question, allow access or exit from the Responsible Person's facilities, provide security in the facilities of S3 CACEIS. The above by means of the collection, use, consult, reproduction, printing or storage of their Personal Information for identification in the entry or exit records, recordings, images and/or voice of Owner for their observation, follow-up, assessment, investigation or procedure carried out by administrative personnel, of management or security internally, to comply with the corporate or regulatory requirements or with competent authorities.

SUPPLIERS: The purposes of Treatment of Personal Information are mainly: to perform selection processes, file integration, budget requests or estimates of goods or services, contacts, billing, performance of regulatory requirements.

CANDIDATES: The purposes for Treatment of Data are: receive the employment application, curriculum vitae, recommendation letters, personal or work references, perform the recruitment and selection process, perform identification, analysis, assessment, verification of technical, school and work capacities, verification of experience, honorability, backgrounds, financial, credit, criminal, performance of interviews, drafting of economic proposals and hiring, if applicable.

EMPLOYEES: The purposes of Treatment of Personal Information are integration of files, signature of agreements, performance of corporate obligations, performance analysis, drafting, delivery, modification of identification codes, credentials, attendance lists, training, travel, attendance to special events, performance of fiscal, labor and social security obligations, granting of recognition nor stimuli.

REFUSAL FOR TREATMENT

The Owner of the Personal Information has a term of 5 (five) business days counted from the day these were attained to state before the Department Responsible for Protection of Information of its refusal for its information to be treated under the terms of the purposes described in this section that are not necessary and that do not result in a legal relationship with the Person Responsible.



For such purposes, the Owner shall state its refusal to the Person Responsible in writing notified at the Responsible Person's address or by means of e-mail to the following address: dprotecciond@s3caceis.com.mx, enclosing copy of the official ID with photograph on both sides.

The refusal must indicate the Personal Information which treatment is being refused by the Owner and the exact purpose subject matter of the refusal.

It is important to highlight, that upon expressing this refusal, the establishment of any relationship with S3 CACEIS may be affected or provoke the amendment termination or cancelation of the one existing due to regulatory breaches or of internal policies of S3 CACEIS.

MEANS TO LIMIT THE USE OR DISCLOSURE

S3 CACEIS, by being a financial institution, already has the technology, policies and procedures to keep in strict confidentiality the Personal Information collected.

The above applies for the different channels through which information or documentation is received by S3 CACEIS, that is, personally, directly or through third parties, by telephone, internet, traditional mail or e-mail, in writing or by any other means that is technological support of delivery.

EXERCISE OF ARCO RIGHTS

S3 CACEIS makes available to the Owner or its legal representative, a direct attention channel of requests for the exercise of its ARCO rights or its revocation right provided by the Law other applicable regulation. The attention area assigned is:

Customer Service Unit

Located at Vasco de Quiroga No. 3900, Torre A, Piso 20, Colonia Santa Fe, Cuajimalpa, Alcaldía Cuajimalpa de Morelos, Código Postal 05348, Ciudad de México.

In any event, the formalities to be followed for addressing the requests shall be the following:

- 1. The Person Responsible shall, under the terms of the common and financial law, verify the identity of the Owner or the personality of the legal representative, who are the only ones authorized to exercise the ARCO rights to the Department of Data Protection of the Person Responsible.
- 2. The Owner of Personal Rights or its legal representative may file its request, in the form provided by the Person Responsible, by means of e-mail addressed to: dprotecciond@s3caceis.com.mx, or in writing addressed to the Customer Service Unit with address at Vasco de Quiroga, No. 3900, Torre A, Piso 20, Colonia Santa Fe Cuajimalpa, Alcaldía Cuajimalpa de Morelos, Código Postal 05348, Ciudad de México. It is worth indicating that the requests made through electronic means shall be addressed once step number 1 above has been verified.
- **3.** The respective requests shall be reviewed by the Customer Service Unit who shall channel them immediately to the Personal Protection Department which shall make a new review to verify that the requests have at least the following elements:
 - a) Name, telephone, physical address and e-mail of the Owner or any other contact to inform of the response to its request;
 - b) The documents evidencing the Owner's ID or, if applicable, the personality of its legal representative;



- c) The clear and accurate description of the Personal Information and/or the reasons for which any ARCO rights are being exercised;
- d) Any other element, document or additional information that facilitates the location of the Personal Information, and
- e) If regarding the right to ratify Personal Information, the Owner must indicate the exact modifications that they wish to perform and contribute the documentation that evidences its request.

The Person Responsible shall be entitled to reject the request in the event any of the requirements mentioned above are not met. The petitioner shall always be informed of the rejection.

- **4.** Access to the Owner of the Personal Information may be denied, or to perform the ratification or cancellation or grant the objection to Treatment thereof, in the following events:
 - a) When the petitioner is not the Owner of Personal Information, or when the personality of the legal representative is not dully credited;
 - b) When in its data base, the petitioner's Personal Information is not found;
 - c) When the rights of S3 CACEIS or of a third party are damaged;
 - d) When there is a legal impediment, or the resolution from a competent authority, that restricts access to Personal Information, or does not allow the ratification, cancellation or objection thereof; and
 - e) When the ratification, cancellation or objection has been previously made.
- 5. If the request meets all the requirements, the process shall continue under the following terms:
 - a) The Person Responsible, through its Data Protection Department, shall have a term of 20 (twenty) business days counted from the day it receives the respective request, to inform the petitioner of the resolution taken;
 - **b)** If the request is admissible, the Person Responsible shall considered it to become effective in a term of 15 (fifteen) business days following the date when the response is informed to the Holder.

The terms may be extended once when the circumstances of the case thus justify it.

- **6.** The Department for the Protection of Personal Information, shall be assisted by the persons that on behalf and representation of the Person Responsible perform Treatment of Personal Information of the Owner and shall jointly implement the necessary measures to perform the request in the times established by regulation.
- 7. The Department of Protection of Personal Information shall inform of the reason of its decision and notify it to the Owner, of if applicable, to its legal representative, through the same means established in the request, enclosing, if applicable, relevant evidence in the terms established for such purpose.

TRANSFERS

The Owner agrees that S3 CACEIS may transfer the Owner's Personal Information to comply with its corporate purpose, perform the obligations acquired, with information, operational, statistical or charitable purposes, to:

- 1. Holding companies, affiliates, subsidiaries or that are part of the same group to which S3 CACEIS belongs at a national or international level;
- 2. Service suppliers at a national or international level;
- **3.** Third parties for matters of structural corporate movements such as merger, spin-off, sale of assets, liquidation;
- **4.** To other persons as allowed by Law and regulation applicable.

The third parties assume the same obligations provided for S3 CACEIS in this Privacy Notice.



AMENDMENTS TO THE PRIVACY NOTICE

Amendments made to this Privacy Notice, shall be notified through any of the following means: (a) Physical document; (b) Document located at a visible place at the address of S3 CACEIS; (c) Message sent through email; (d) Communication published through the web page S3 CACEIS (www.s3caceis.com.mx/); or (e) Major newspapers.

SPECIAL NOTES

ARCO Rights

- (a) Right of Access. The Person Responsible complies with the right of access when, prior evidence of the Owner's identity or the personality of its representative, makes available free of charge, the Personal Information in the site or through the issuance of copies, magnetic, optical, sound, visual or holographic means or otherwise. Including it may be agreed with the Owner the method of delivery or reproduction if thus considered convenient by the Responsible Person.
 - If the Owner reiterates its request with respect to the same data in a period of less than twelve months, the latter shall cover an amount of no more than three days of the Minimum General Wages in Effect in the Federal District, unless there is a substantial amendment to treatment that gave rise to the new consult.
 - If access to Personal Information is performed in site, the Person Responsible shall inform the period during which the Owner may appear to consult them, which may not be of less than 15 (fifteen) business days. Any information that is provided to the Owner must be provided in a legible and comprehensible format, using therefore a simple and clear language.
- (b) Right of Cancellation: In the event the cancellation of the Personal Information is admissible, the Person Responsible:)(i) shall notify the Owner in its response, the blocking period of the personal information; (ii) Shall block the Personal Information; (iii) Shall implement the security measures that allow preserving the Personal Information, disabling any exploit of the information; (iv) Shall notify the Persons in Charge of Treatment of Personal Information to whom the data were informed, in order to proceed to the respective suppression; and (v) Shall suppress the Personal Information corresponding so that the elimination does not allow the information to be recovered in any way, once the blocking period has lapsed.
- (c) Right of Objection: The Owner shall indicate if it objects to specific Treatment or Treatments referring to which Treatments are those the Owner does not agree with. In the event the exercise is due to a loss, it shall explain which loss was caused and if applicable, the Person Responsible shall make the corresponding assessment.
- (d) Right of Ratification: The Owner may exercise the right of ratification with the purpose of correcting or updating its personal information. For this purpose, it shall be necessary to file the respective ratification request to S3 CACEIS indicating the modifications to be made, providing documentation that evidences the change in the data requested.

User Public Registry: REUS (for its initials in Spanish) is the registry containing information of users that do not wisht to be bothered by financial institutions with advertisement or promotions. For the above purposes it is sufficient for the Owner to register in such registry through the internet page: www.condusef.gob.mx.

Procedure before INAI: INAI has a procedure for the protection of the Owner's rights who may file it within 15 (fifteen) business days following the date when the reply from the Person Responsible is received, or from



the conclusion of the term of 20 (twenty) business days counted from the reception of its request to exercise rights and not having received any answer.

Date of last update of this PRIVACY NOTICE: November 13, 2020.