

GARDHI VILA®

Attorneys at Law

PRIVACY NOTICE

In compliance with the provisions of the *“Federal Law on Protection of Personal Data Held by Private Parties”* (Hereinafter the “Law”) and the specifications and parameters set forth on the *“Regulations to the Federal Law on Protection of Personal Data Held by Private Parties”* (Hereinafter the “Regulation”); GARDHI VILA®, S.C. (Hereinafter “GARDHI VILA®”) by this means, provides to the public the terms and conditions of its Privacy Notice for the protection on personal data (Hereinafter the “Privacy Notice”) of clients, future clients, collaborators, suppliers, service providers and third parties (Hereinafter the “Owner”).

RESPONSIBLE OF PERSONAL DATA

The responsible of receiving, handling and safeguarding the information will be GARDHI VILA® this information will be only used for the sole purposes agreed with the personal data Owner whose consent will be always required in all the agreements unless the owner has previous knowledge and has accepted the Privacy Politics, attached to this Privacy Notice. The obligation of protecting the information might be shared with third parties, on the assumption that a prior agreement is made with the personal data Owner accepting this precept or when a third party intervention is necessary and regulated through private instrument. However, the Owner of personal data will be always notified about any third party intervention, unless the Owner have already previous knowledge about such intervention.

COLLECTED PERSONAL DATA

GARDHI VILA® could partially or totally request to its clients, future clients, collaborators, suppliers, service providers and third parties, the following General Identification Data: Full name, date of birth, nationality, age, gender, place of birth, home address, phone number, email address, Unique Population Registry Code (CURP from its Spanish acronym), tax identification number, passport number, code population register of any kind, marital status, criminal record, curriculum vitae, act of birth, proof of address, recommendation letters, educational background, professional title, signature, and or other similar information. The clients, future clients, collaborators, suppliers and service providers will be jointly responsible and obliged under the terms of this Privacy Notice with third parties when these are involved regarding the service; negotiation or relation with GARDHI VILA® and whose

purpose is merely complementary in the relationship or agreement of the parties. The aforementioned persons shall give the right use and safeguarding of all the information.

GARDHI VILA® could partially or totally request to its clients, future clients, collaborators, suppliers, service providers and third parties, the following financial and accounting data: Tax number, bank accounts, standardized bank account, economic capability of payment, advanced electronic signature, credit history. If necessary, GARDHI VILA® could collect as well, in a partial or total manner, corporate information such as: Constitutive act, statutes reform, ordinary and extraordinary assemblies as well as shareholder assemblies, council meetings, corporate books, equity securities, stock certificates, powers of attorney; certificate of registry issued by the Public Registry of Property and Commerce. The before said information could be considered personal data according to the “*National Institute of Transparency and Access to Information*” (INAI from its Spanish acronym), as well as all the documents that integrate the aforementioned corporate documents on which there are mentions of partners, associates, shareholders, legal representatives, directors, notaries public and special delegates related to the Owner information.

That personal data perceptible through the People Image Format by either photo capture or video; as well as the data captured on official identifications will be equally protected under the premises of this Privacy Notice and those stipulated on the *Law* and its *Regulation*.

SENSITIVE PERSONAL DATA TREATMENT

GARDHI VILA® informs you that by general rule, the personal data that could be considered as sensitive, it is not collected, such as present or future health status, diseases, racial or ethnic origin, affiliation to a labor union, religious beliefs, sexual preference, etc. However, if it is necessary to collect that type of information, the express consent of the sensitive personal data Owner will be required and protected with extreme confidentiality. The manipulation of the sensitive personal data will be processed with strict and extreme security in order to guarantee the trust and intimacy of the personal data Owner.

COLLECTED INFORMATION OF THIRD PARTIES

Hereby, GARDHI VILA® informs you that in regards to those third parties that are not clients, future clients, collaborators, suppliers or services providers it will only be gathered their captured image or videotaped image according to the “Privacy Notice for the Video Camera Circuits” for the purposes set forth on the aforementioned privacy notice, which is available on our website www.gardhivila.com. The aforementioned captured image and videotaped image will be used for the sole purpose of safety measures of GARDHI VILA® installations. The captured image and videotaped image of clients,

future clients, collaborators, suppliers and service providers will be equally safeguarded by the referred privacy notice.

PURPOSE OF THE GATHERED INFORMATION

The information collected by GARDHI VILA® have the following purposes: (a) to render the legal services requested and/or contracted with our firm, as well as, to make all the necessary procedures to perform all the legal services and to inform you about the situation and status of the matters that are carried out on your representation; (b) to identify the client, future client, collaborator, supplier, services provider and/or third party; (c) to perform any documented negotiation; (d) to remind debts or pending payments; (e) to make improvements to the services; (f) to send institutional information; (g) to integrate the data file in order to be able to make future enquiries and revisions; (h) to comply with tax or commercial obligations before the corresponding authority; (i) to send gratitude, incentives or recognition; (j) to improve the publicity and marketing standards of the firm; (k) to give assistance on any inquiry, doubt, clarification or complaint; (l) to process job applications and fulfil our process of recruitment; (m) to localize, evaluate, quote, hire and acquire goods and services that the firm requires for its operations; (n) to make statistics, etc.

All the aforementioned purposes will be aimed to the development, implementation and growth of the legal services offered by GARDHI VILA® and to the safeguarding of the rights of the personal data Owner.

CONFIDENTIALITY AND LIMITATIONS

GARDHI VILA® will develop all the administrative, technic and physical safety measures in order to protect your information, guaranteeing at every time strict confidentiality and privacy of your data; through the implementation of privacy politics and control information. Apart from the mentioned above, the safeguarding of your information will be always performed under the assumptions set forth on the agreements; in compliance with the parameters of the *Law*, its *Regulation* and the assumptions stipulated by the INAI, as well as any other applicable regulation. GARDHI VILA® will not sell, lease or alienate information related to the personal data of the Owner or the third party that is used as a reference; no information will be shared or transferred except when the Owner breach any of the obligations contracted with GARDHI VILA® which will be always notified through the corresponding notice.

TRANSFERENCE OF PERSONAL DATA

The information gathered by GARDHI VILA® may be shared with third parties either legal or natural person.

GARDHI VILA® is enabled to transfer your Personal Data to third parties whether if it is natural or legal person in the sole situation when transfer is necessary to conclude the agreement and/or services contracted with GARDHI VILA®. The prior express consent of the personal data Owner will be always required regarding to sensitive personal data, otherwise, if the requested data is non-sensitive it will be enough to inform the Owner in terms of this Privacy Notice, provided that the third party is aware about the obligations herein stipulated. The personal data may be transferred without previous notification to the owner, in case of agreements celebrated with either natural and/or legal persons and providing that the personal data Owner gives his/her consent in broad character and allow the disclosure of his/her data to other societies that work on the area specified on the corresponding contract and it is required to share the information in repeatedly occasions.

Likewise, by this means we inform you that third parties will assume the same obligations and liabilities in relation with the treatment of your personal data at the disposal of GARDHI VILA® in terms of this Privacy Notice and the principles of protection of personal data set forth on the *Law* and its *Regulation*.

ACCESS, RECTIFICATION, CANCELLATION AND OPPOSITION (ARCO) RIGHTS

The personal data Owner in its own right or through his/her legal representative will be enabled to initiate the Access, Rectification, Cancellation and Opposition (ARCO) rights procedure in order to entail the correct treatment of his/her personal data or to end the treatment of his/her information. Hereby, GARDHI VILA® compromises to perform the procedure according to the *Law* and its *Regulation*. This procedure may be developed by sending a letter to the address mentioned in the *ASSISTANCE ON DOUBTS AND COMPLAINTS* section of this Privacy Notice.

The ARCO process is accurately explained in the ARCO Rights Module that GARDHI VILA® provides through its website and its offices. Such right is enforceable by the personal data Owner if he/she requires it, either physically or electronically and as long as the Owner and the Society are contractually related. In the event that there is no such contractual relationship, this right is equally enforceable on the assumption that the personal data Owner proofs that he/she has suffered damaged due to the treatment of his personal information.

Hereby, GARDHI VILA® informs you that in case that all the legal procedures are concluded without obtaining a satisfactory result, you might initiate the rights protection procedure before the “*National*

Institute of Transparency and Access to Information and Protection of Personal Data” (INAI from its Spanish acronym), which website is www.ifai.gob.mx. The aforementioned procedure shall be started within the next 15 (fifteen) days after the notification of the final response of your application carried out by GARDHI VILA®, provided that this response does not satisfy your inquiries or in the lack of response according to Law.

CONSENT REVOCATION

The Consent revocation regarding the treatment of your information will proceed when the personal data Owner requests it in its own right or through its legal representative, whose authorization to act on its behalf must be given by the personal data Owner through Power of Attorney before two witnesses. The aforementioned Power of Attorney ought to be attached to the revocation application, which shall be done following the ARCO rights procedure and on the condition that no agreement has been signed between GARDHI VILA® and the personal data Owner in compliance with this Privacy Notice.

EXCLUSION AND CANCELLATION LIST

GARDHI VILA® will not be able under any contractual circumstances to retain the information of the personal data Owner when the treatment of such information has been properly cancelled with the corresponding legal process. However, GARDHI VILA® may be able to retain such information in the following cases: Labor disputes, criminal presumptions, periods by applicable regulations and request of the authority.

GARDHI VILA® will be responsible for the retained information related to the mentioned in the previous paragraph; and once the periods are completed, such information will be removed from GARDHI VILA® database.

GARDHI VILA® commits to include your data in an exclusion list, in order to suspend any contractual activity and service offering that could bother you regarding the use of your information. The aforementioned data will be safeguarded until the periods established on the respective Law have ended and by authority request to proceed to its cancellation which will be accurately notified to you.

ASSISTANCE ON DOUBTS AND COMPLAINTS

Hereby, we inform you that in order to assist you on doubts and/or complaints related to your personal data; as well as the monitoring of the ARCO rights procedure, you may contact GARDHI VILA® in our offices located in Severo Diaz 38, Ladrón de Guevara, P.C. 44600, Guadalajara, Jalisco, México;

Telephone +52 (33) 1204-0477; or by sending an email to the address alejandra@gardhivila.com and as long as the contractual relationship or the affectation of rights is proved.

UPDATING AND MODIFICATIONS

GARDHI VILA® reserves the right to update and make changes to this Privacy Notice at any time. All the modifications made to this Privacy Notice will be notified through its website www.gardhivila.com and it will be visible as well at GARDHI VILA® Office.