

# Privacy Notice

**IMPORTANT:** This privacy notice will be valid and will be exercised when whistleblowers make reports through our Ethical Whistleblower System, if they share their personal data with us.

## 1. Responsible for the protection of your personal data

EthicsGlobal (hereinafter the "Company"), domiciled at World Trade Center, Montecito 38, Piso 42 Oficina 1,9; Col. Nápoles, Benito Juárez, C.P. 03810, is responsible for the processing of your personal data and is committed to ensuring the privacy of personal information obtained through its services offered through the Ethical Whistleblower System and other means permitted by law. However, it is suggested to read the regulations described below to understand the treatment of the data provided.

### How to contact us?

-Responsible for the Personal Data Protection Area: Carolina Valencia.

-Address: World Trade Center, Montecito 38, Piso 42 Oficina 1,9; Col. Nápoles, Benito Juárez, C.P. 03810

-E-mail: [cvalencia@ethicsglobal.com](mailto:cvalencia@ethicsglobal.com)

-Phone: 55-52-61-78-78-78

## 2. For what purposes do we collect and use your personal data?

Your personal data will be used for the following purposes:

1. in order to facilitate the investigation process of a report made through the Ethical Whistleblowing System provided by EthicsGlobal.
2. To gather further information as evidence or testimony of a report generated through the EthicsGlobal Ethical Whistleblowing System provided by EthicsGlobal.
3. To contact you and send you relevant information regarding the report you generated through the Ethical Whistleblowing System provided by EthicsGlobal.



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800 04 38422  
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### 3. What personal data will we collect and where?

The means offered by EthicsGlobal: the toll free line 800 04 ETHICS (38422) in Mexico (and the 01 800 vanity numbers according to the specifications of each client), the internet sites with EthicsGlobal sub domain and those sites with our clients' own domain, the e-mail addresses requested by our clients, the information gathered via chat or through the Mobile APP or our SMS channel, Whatsapp, as well as all that information sent to World Trade Center, Montecito 38, Piso 42 Oficina 1,9; Col. Nápoles, Benito Juárez, C.P. 03810, constitute communication channels intended to facilitate the reception, process, sending of report, exchange and/or responses of irregular situations that occur in EthicsGlobal's client companies.

Below, we detail the guidelines of the Privacy Policy that governs these media. The entry of the user's personal data through the means indicated and the express acceptance of this Privacy Policy are a necessary requirement to facilitate the contact of the user by EthicsGlobal's clients, so that the clients themselves initiate an investigation and give their corresponding response to their report or complaint through the means indicated provided by EthicsGlobal's Ethical Whistleblower System.

The user who decides to provide his/her personal data declares to know and accept the following:

a) The recipients of the personal data are exclusively EthicsGlobal's clients, who may use the same for the purposes of carrying out the relevant investigations and reports, preparing general statistics, without identifying the user, making inquiries or communicating with the user, all without prejudice to EthicsGlobal's right to keep the user's personal data exclusively for statistical purposes. EthicsGlobal shall not be responsible for the action taken by its clients in response to the report made by the user or the consequences that such action may have for the user, the person who is the subject of the report or any interested third party. In this regard, the informant states that (i) there is no legal relationship whatsoever that binds it to EthicsGlobal, who merely makes available to the client of its clients the report, information, documentation and/or personal data that the user reports and/or provides through any of the means offered by EthicsGlobal. (ii) The personal data will be incorporated to EthicsGlobal's database, being its responsible EthicsGlobal, with address at World Trade Center, Montecito 38, Piso 42 Oficina 1,9; Col. Nápoles, Benito Juárez, C.P. 03810 (iii) The user guarantees and responds in any case for the truthfulness, accuracy, validity, authenticity and certainty of the personal data entered in the means offered by EthicsGlobal (see first paragraph), so it assumes the corresponding responsibility in case they prove to be inaccurate. EthicsGlobal assumes no liability in the event of inaccuracy of any of the data entered by the user in the means offered by EthicsGlobal.

EthicsGlobal. (iv) The user accepts and gives his/her free, express and informed consent for such data to be used for the above-mentioned purposes, and authorizes that such data be processed, stored, collected or transferred.



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The transfer of personal data of users will be made exclusively for EthicsGlobal clients, and will be exclusively for the purpose of the clients themselves to initiate an investigation, request expansion of the complaint filed with the user and / or ask questions or clarifications they consider relevant, and give the corresponding response to the report or complaint through the means indicated 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 rules of protection of personal data in force in the United Mexican States, this Privacy Policy, as well as all that EthicsGlobal complies with in terms of protection of privacy, security and confidentiality of information. (vi) The user who enters his personal data may, at any time and in exercise of the rights conferred by the Federal Law on Protection of Personal Data Held by Private Parties.

a) The personal data that ETHICSGLOBAL obtains and will obtain by any means from you, may be, among others:

- Name
- Gender
- Address
- E-mail address
- Landline and/or cell phone
- R.F.C.
- Position
- Employee Number

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

The information requested will allow us to contact you when necessary. Users may be contacted by telephone, email or by any other means or in person if required.

b) Personal Data we collect through OTHER SOURCES:



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We may obtain information about you from other sources permitted by law. Such information may include, but is not limited to:

- Name
- Your gender
- Your email address
- Your telephone number
- Age
- Marital Status
- C.F.R.

#### 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 containing your profile, which may be modified by the owner at any time upon accreditation or identification, or if necessary, by means of the corresponding key or password.

Users are advised to update their data periodically.

To limit the use of your personal data, you can contact our Personal Data Protection Officer at the following e-mail address: [cvalencia@ethicsglobal.com](mailto:cvalencia@ethicsglobal.com) or call 52-61-78-78.

#### 5. How to access or rectify your personal data or cancel or oppose its use?

You have the right to access your personal data that we possess and the details of the treatment of the same, as well as to rectify them in case they are inaccurate or incomplete; Cancel them when you consider that they are not required for any of the purposes stated in this privacy notice, they are being used for non-consensual purposes or the contractual or service relationship has ended, or, Oppose the treatment of the same for specific purposes, these rights together, are called ARCO Rights.

Any holder of personal data, such as you or, if applicable, your legal representative, may exercise any of the rights to access or rectify your personal data or cancel or oppose its use, cancellation or opposition before the companies that have them in their databases.

It is important to note 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 other three.



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Procedure to Access or Correct your Personal Data or Cancel or Oppose its Use.

(as of January 06th, 2012)

The mechanisms that have been implemented for the exercise of such ARCO rights are through the presentation of the respective request in writing, before our Responsible of the Personal Data Protection Area, at the following address: Calle MONTECITO 38, PISO 42 OFICINA 1,9; COL. NÁPOLES, BENITO JUÁREZ, CP. 03810, or by sending your request to the following email: [dpo@ethicsglobal.com](mailto:dpo@ethicsglobal.com)

Once the request has been submitted (format that can be requested to the person responsible for the safekeeping of the personal data to the e-mail: [cvalencia@ethicsglobal.com](mailto:cvalencia@ethicsglobal.com)), you have a maximum period of 20 working days to respond, and 15 more working days to exercise the right you request, in case it is appropriate.

The deadlines may be extended once and for an equal period when there are facts that justify it.

ETHICSGLOBAL may totally or partially refuse to allow access, or to carry out the rectification or cancellation of personal data, or to grant opposition to the processing thereof when:

- The applicant is not the owner of the personal data, or the representative is not duly accredited.
- The individual or company does not have the personal data in its possession.
- Personal data of a third party is harmed.
- There is any legal impediment or resolution of a competent authority that restricts the exercise of any of the ARCO rights.
- The requested rectification, cancellation and opposition has been previously carried out.
- When the contractual rights of ETHICSGLOBAL AND ITS BUSINESS PARTNERS are affected.

ETHICSGLOBAL must communicate and justify when any of the above assumptions occur and cannot carry out the action that was requested.

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

Your request must contain the following information:

The request must be submitted to the address indicated above, or via e-mail to the e-mail address indicated above. The request must contain the following information:



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- Your name and address or mean to receive communications.
- Your identification or documents proving the personality of your legal representative.
- Specify the data you wish to access or rectify or cancel or oppose to its use as well as any document that justifies the rectification, or,
- Any other element or document that facilitates the location of your personal data.

The deadlines for responding to your request are as follows:

Once the request has been submitted, ETHICSGLOBAL has a maximum period of 20 working days to respond, and 15 more working days to make effective the exercise of the right requested, in case it is appropriate.

The deadlines may be extended once and for an equal period when there are facts that justify it.

To learn about the procedures, requirements and deadlines, you can contact our Personal Data Protection Area Manager at [dpo@ethicsglobal.com](mailto:dpo@ethicsglobal.com), or call 5552617878, or request information at the address located at Montecito 38, Piso 42 Oficina 1,9; col. Nápoles, Benito Juárez, C.P. 03810.

#### 6. How can you revoke your consent for the processing of your data?

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

Procedure to revoke your consent. (As of January 06, 2012)

For a correct attention to your request to revoke your consent for the use of your personal data, you must submit to the above address, or via e-mail to the above mentioned e-mail the request containing the following information:

1. Your name and address or means to receive communications.
2. Your identification or documents proving the personality of your legal representative.
3. Specify the data with respect to which you wish to revoke your consent for the treatment of the same.
4. Any other element or document that facilitates the location of your personal data.



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The deadlines for responding to your request are as follows:

Once the request has been submitted, THE COMPANY has a maximum period of 20 business days to respond, and 15 more business days to make effective the revocation of your consent for the processing of your data, if applicable.

The deadlines may be extended only once and for an equal period when there are facts that justify it.

## 7. COOKIES AND WEB BEACONS

Cookies are text files that are automatically downloaded and stored on the hard drive of the user's computer equipment when browsing a specific Internet page, which allow the Internet server to remember some data about the users accessing the websites provided by EthicsGlobal as part of the Ethical Whistleblower System, as well as to track certain behaviors or activities.

Cookies allow us to recognize users, detect the bandwidth they have selected, identify the most relevant information, calculate the size of the audience and measure certain traffic parameters.

Web beacons are images inserted in a web page or email, which can be used to monitor the behavior of a visitor, such as storing information about your IP address, duration of interaction time 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 following:

Understand and save user preferences for future visits,

Track advertisements,

Collect additional data about site traffic and site interaction in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf. We will not affect the user experience

These cookies and other technologies can be disabled. To learn how to do this, please refer to the following link or email address <http://www.benchmarkemail.com/es/help-FAQ/answer/how-can-I-disable-cookies-on-my-browser-web>

## 8. Transfer of personal data and confidentiality



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When the user is in any of the ethical systems provided by EthicsGlobal they will share your information with THE COMPANY, unless otherwise specified.

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

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

THE COMPANY will NOT sell, give away, provide or rent confidential information to third parties. If the user does not want his/her data to be shared, they may dispense with a specific 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 by law.

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

The security and confidentiality of the data provided by users when contracting a service or purchasing a product online will be protected by a secure server under the Secure Socket Layer (SSL) protocol.

Secure Socket Layer (SSL) protocol, in such a way that the data sent will be transmitted encrypted to ensure its safekeeping.

To verify that you are in a protected environment, make sure that an S appears in the navigation bar. Example: <https://>

However, and in spite of having every day safer tools, the protection of the data sent through Internet cannot be guaranteed to 100%; so 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, it will be understood that you have given your consent to do so.

We undertake not to transfer your personal information to third parties without your consent, except for the exceptions set forth in Article 37 of the Federal Law for the Protection of Personal Data in Possession of Individuals, as well as to carry out this transfer under the terms set forth in the law.

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



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Article 37.- National or international transfers of data may be carried out without the consent of the data owner when any of the following events occur:

- I. When the transfer is provided for in a Law or Treaty to which Mexico is a party.
- II. When the transfer is necessary for prevention or medical diagnosis, the provision of health care, medical treatment or the management of health services.
- III. When the transfer is made to holding companies, subsidiaries or affiliates under the common control of the responsible party, or to a parent company or any company of the same group of the responsible party that operates under the same internal processes and policies.
- IV. When the transfer is necessary by virtue of a contract entered into or to be entered into in the interest of the owner, by the data controller and a third party.
- V. When the transfer is necessary or legally required for the safeguarding of a public interest, or for the procurement or administration of justice.
- VI. When the transfer is necessary for the recognition, exercise, or defense of a right in a judicial proceeding.
- VII. When the transfer is necessary for the maintenance or fulfillment of a legal relationship between the data controller and the data subject.

#### **9. Modifications to the privacy notice**

ETHICSGLOBAL reserves the right to make changes or updates to this privacy notice at any time and adapt them to new legislation, jurisprudence, internal policies or new requirements for the provision or offering of 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 announcements in our branches; III) or we will send them to the last email address you have provided us.

It is the user's responsibility to periodically read the privacy policies in order to be aware of such modifications.

#### **10. To whom can you submit your complaints and denunciations about the improper processing of your personal data?**

If you believe that your right of protection of personal data has been violated by any conduct of our employees or our actions, or there is any violation of the provisions of the Federal Law on



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Protection of Personal Data Held by Private Parties, you may file a complaint or complaint with the National Institute for Transparency, Access to Information and Protection of Personal Data (INAI), for more information visit [www.ifai.org.mx](http://www.ifai.org.mx).

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