



Comprehensive Privacy Notice for Clients

Pursuant to the Federal Law on the Protection of Personal Data Held by Private Parties (hereinafter, the "Law"), its regulations, and various current and related provisions (hereinafter, the "DP Legislation"), by means of this Comprehensive Privacy Notice for Clients (the "Privacy Notice"), we hereby inform you about the processing of your Personal Data.

1. Defined Terms

"Personal Data": means any information concerning an identified or identifiable natural person.

"Sensitive Personal Data": means personal data that affects the most intimate sphere of its data subject, or whose improper use could lead to discrimination or entail a serious risk for the data subject. In particular, data that may reveal aspects such as racial or ethnic origin, present and future health status, genetic information, religious, philosophical, and moral beliefs, trade union membership, political opinions, sexual preference are considered sensitive.

"ARCO Rights": means the rights of Access, Rectification, Cancellation, and Opposition.

"Controller": means the natural or legal person of a private nature who decides on the Processing of Personal Data.

"Data Subject" means the natural person to whom the Personal Data corresponds.

"Transfer": means any communication of data made to a person other than the Controller or Processor.

"Processing": means the collection, use, disclosure, or storage of Personal Data, by any means. Use includes any action of access, handling, use, transfer, or disposal of Personal Data.

2. Identity and Domicile of the Controller.

CCLA, as well as its affiliates and subsidiaries and/or its business units (hereinafter, the "Controller"), with its address for the purposes of this Privacy Notice at Av. Jaime Balmes 8, Polanco, Polanco I Secc, Miguel Hidalgo, 11510 Mexico City, CDMX, Mexico, may obtain, use, and store your Personal Data as the Data Subject thereof in your capacity as a client or potential client of the Controller and shall be responsible for its protection and processing under the terms of the DP Legislation.

3. Obtaining Personal Data.

The Controller will collect Personal Data through websites or forms (the "Site"), as well as directly from the Data Subject upon contracting the Controller to provide any of its services or for any type of operation entered into with the Controller, and also through third parties and other sources permitted by law, such as authorities; said data will be processed under the principles of lawfulness, consent, information, quality, purpose, loyalty, proportionality, and responsibility.

4. Third-Party Personal Data.

In the event that the Data Subject has provided contact data of third parties such as references, authorized persons, joint holders, spouses, beneficiaries, co-borrowers, references,

guarantors, jointly and severally liable parties, endorsers, sureties, guardians, providers, beneficiaries, and other legal figures related to the Controller's services, the Data Subject guarantees that they have prior authorization to provide said data, including, where applicable, the relevant PERSONAL DATA, and is responsible for communicating to said persons the terms and reasons for which we will contact them and, where applicable, the Processing of their Personal Data in accordance with this Privacy Notice, as well as the means to know its full content. Additionally, by consenting to this Privacy Notice, the Data Subject ratifies their authorization for the Controller to contact said persons. The Controller will comply at all times with the provisions of the DP Legislation regarding the Personal Data we obtain indirectly.

Please note that information about our clients who are legal entities is not considered Personal Data under the terms of the DP Legislation, on the understanding that we will treat it with the same level of care as the information of our clients who are natural persons. In the event that our clients who are legal entities share with us Personal Data that

they maintain (for example, from their employees), we will understand in good faith that they have the necessary authorizations to share such personal information with us and will be subject to what is indicated in the preceding paragraph.

5. Personal Data that will be Collected by the Controller.

The Controller will collect and process the following Personal Data of clients and/or potential clients:

- a. Full name
- b. Cell phone number
- c. Identification number
- d. Email address
- e. Data from your official ID
- f. Nationality
- g. Address
- h. Federal Taxpayers' Registry
- i. Unique Population Registry Code (CURP)
- j. Proof of tax compliance

In any case, the information must be truthful and complete. Because it is the Data Subject who provides their Personal Data, we presume that said data is truthful until you state and prove otherwise, or the Controller obtains evidence to the contrary.

6. Sensitive Personal Data

We inform you that the Controller does not collect or process Sensitive Personal Data of the Data Subject, such as that referring to racial or ethnic origin, present and/or future health status, genetic information, religious, philosophical, and/or moral beliefs, union membership, political opinions, and sexual preference, among others.

7. Purpose of Processing your Personal Data.

The Personal Data that the Controller collects from the Data Subject will be processed for the following primary and secondary purposes.

Primary Purposes. - Purposes that give rise to and are necessary for the legal relationship between clients and potential clients and the Controller:

1. To identify and contact you.
2. To provide you with the information you request, prepare quotes, make reservations, purchases, cancellations, changes, and deliver products and services.
3. To notify you of changes, delays, cancellations, or other aspects of the contracted services.
4. To provide the required services and any related services.
5. To maintain, develop, administer, control, and comply with the contractual relationship derived from the request and/or contracting of our services.
6. To issue the corresponding tax receipts for the payment of the contracted services.
7. To attend to advisory services and inquiries via chat and/or by any other means.
8. To attend to clarifications, inquiries, comments, and complaints regarding the services provided, as well as to take into consideration the opinions you send us or publish on social media. Also, to provide technical support, resolve problems, or any other communication related to the commercial relationship.
9. To seek to provide you with a quality telephone support service, for which we may record the calls answered.
10. Sale of additional services.
11. To report incidents and accidents that may occur.
12. To follow up on, and make any payment that may be applicable as a result of, claims, compensations, discounts, or reimbursements.
13. To create, order, catalog, classify, divide, separate, and store data and files of the Data Subjects.
14. To transfer the Personal Data as appropriate in accordance with the "Data Transfer" section of this Privacy Notice.
15. To carry out collection activities.
16. To administer, develop, maintain, personalize, and improve our Site and our services and carry out the necessary activities for them to function optimally and correctly, as well as to prevent or detect fraud or abuse.
17. Prevention, investigation, and handling of fraudulent activities and/or any other type of criminal activity.
18. To comply with the legal relationship that exists between the Data Subject and the Controller.
19. To attend to emergency situations, acts of God, or force majeure, and to inform the competent authorities.
20. Complementary activities necessary for the fulfillment of the foregoing purposes.
21. Checking your records on blacklists

Secondary Purposes

Distinct purposes that do not give rise to the legal relationship between you and the Controller, but which are of great use to us for providing you with a better service and developing our legitimate business interests:

1. Marketing, advertising, promotion, commercial prospecting, referral processes, the creation, assessment, and analysis of User profiles for the development and offering of new products and services, conducting surveys unrelated to our products or services, analytical and statistical purposes, all of which are related to the services of the Controller, its affiliates, subsidiaries, partners, and other third parties.
2. To be in contact by mail, email, or telephone to share information bulletins with you and to conduct surveys in relation to the quality of the Services provided by the Controller.
3. Conducting satisfaction surveys: Using the Data Subject's data to carry out satisfaction surveys in order to obtain feedback on the quality of the products or services, and to improve the Data Subject's experience.
4. To inform you and/or offer you products, services, and promotions.

8. Refusal of the processing of Personal Data for secondary purposes.

In the event that you do not wish for your Personal Data to be processed for the aforementioned secondary purposes, or any of them, you may refuse your consent from this moment by sending your request to our privacy department, which will indicate the procedure to follow to exercise your right. Your refusal in this regard may not be a reason for us to deny you the services and products that you request or contract with us.

9. Use of Cookies, Web Beacons, and Other Similar Technologies

Cookies are small pieces of information that are sent by a website to your browser and stored on your computer's hard drive and are used to determine your preferences when you connect to the services of our sites, as well as to track certain behaviors or activities carried out by the Data Subject within our sites.

CCLA

In some sections of our Site, we require that the User have cookies enabled, as some of the functionalities require them to work. Cookies allow us to: a) recognize the user upon entering our sites and offer them a personalized experience, b) know the personal configuration of the site specified by the user, for example, cookies allow us to detect the bandwidth that the user has selected when entering the home page of our sites, so that we know what type of information is advisable to download, c) calculate the size of our audience and measure some traffic parameters, as each user who accesses our sites acquires a cookie that is used to determine the frequency of use and the sections of the sites visited, thus reflecting their habits and preferences, information that is useful for us to improve the content, headlines, and promotions for users. Not all functions of the sites require these to be enabled.

Cookies also help us to track certain activities. For example, in some of the surveys we launch online, we may use cookies to detect if the User has already filled out the survey and avoid displaying it again if they have done so. However, cookies will allow you to take advantage of the most beneficial features we offer, so we recommend that you leave them activated. The use of cookies will not be used to identify users, with the exception of cases where possible fraudulent activities are investigated.

In this regard, we inform you that the Site makes use of cookies and other technologies, through which it is possible to automatically monitor your behavior, provide you with our services, and grant you an optimal and personalized experience during their use, as well as offer you new services based on your preferences. The Personal Data collected through these technologies are: IP address, websites and sections thereof that the User visits from the Sites, before the Sites or on pages related to the Site, browser characteristics, device characteristics, operating system, language preferences, referring URL, information on conduct and actions performed on the Site, dates and times of visits to the Sites, sections or content consulted on them, and User location and localization data.

These technologies can be disabled by accessing the Privacy and/or Security option(s) located in the Options, Tools, Internet Preferences or similar functions section(s) of the Internet browser you are using; however, upon deactivating them, you should be aware that such action could prevent you from being able to obtain the full functionality that the Site may offer.

10. Transfer of Personal Data.

For the fulfillment of the primary purposes indicated in this Notice, your Personal Data may be transferred within the national territory or abroad, in accordance with the following:

- a. To authorities, agencies, or governmental entities, in compliance with or in relation to the obligations provided for in the legislation applicable to the Controller, its subsidiaries and/or affiliates, as well as in compliance with requests made to them.
- b. To authorities, agencies, or governmental entities, when the transfer is officially required and/or necessary for the recognition, exercise, or defense of a right of the Controller, its subsidiaries and/or affiliates in a judicial proceeding.
- c. To third-party acquirers, resulting from a corporate restructuring of the Controller, including a merger, consolidation, sale, liquidation, or transfer of assets, when the transfer is necessary for the maintenance or fulfillment of a relationship between said Controller and the Data Subject.
- d. To affiliated or subsidiary companies of the Controller, which are part of the same group, that operate under our same internal processes and policies, for the purpose of providing you with better service and complying with our internal regulations.
- e. When the transfer is necessary by virtue of a contract executed or to be executed in the interest of the data subject, by the controller and a third party.
- f. When the transfer is necessary for the maintenance or fulfillment of our contractual relationship with you.
- g. Based on the other cases established in the Personal Data Legislation, which do not require your consent.

In accordance with the Personal Data Legislation, the aforementioned transfers do not require your consent.

Likewise, identification and contact Personal Data may be transferred to the following legal entities, in which cases we do require that you grant us your consent:

- a. To third parties that display and market services through our sites, commercial partners, and other strategic partners of the Controller, for marketing, advertising, or commercial prospecting purposes.

- b. Companies with commercial activities, for the purpose of commercial prospecting and the sale of their own products or services or those of said companies.
- c. Companies with promotional, marketing, and advertising activities, for the purpose of conducting studies, market surveys, disseminating advertising, and informing you of promotions for travel, destinations, and tickets.
- d. Companies with financial activities, for the purpose of offering you products and services from said companies or under a co-branded mark.
- e. Companies with tourism activities, for the purpose of promoting their lodging and dissemination services in national and international destinations.

If the Data Subject does not express their refusal for us to carry out these transfers, or any of them, we will understand that they have granted us their consent. The refusal for the transfer of Personal Data can be made from this moment by sending an email to the Controller's Personal Data department at the following email address: datospersonales@cclagroup.com.

In any of the aforementioned cases, we will provide the third-party recipients with this Privacy Notice in order to ensure that their information is used in accordance with its terms.

11. Personal Data Department.

Our Personal Data department will be responsible for processing requests for the exercise of rights and for promoting the protection of Personal Data. This department is located at the aforementioned address and can be contacted at that address or by email at datospersonales@cclagroup.com.

12. Means to exercise your rights.

In all legally applicable cases, the Data Subject may at any time and through the procedure established in this section, exercise the following rights regarding their Personal Data: (i) the rights of Access, Rectification, Cancellation, and Opposition ("ARCO Rights"); (ii) revoke the consent granted to each of the Controllers for the processing of their personal data; (iii) limit the use or disclosure of their personal data; and (iv) express their refusal for the processing of their personal data with respect to secondary and ancillary purposes or for certain transfers previously mentioned in this notice.

13. ARCO Rights

To exercise said rights concerning your Personal Data, the Data Subject or their duly accredited legal representative must submit the corresponding request via email to the following address: datospersonales@cclagroup.com, addressed to our Personal Data Department, which will inform you about the procedure and requirements to exercise these rights, response times, the manner in which we will make your right effective, and will address any questions, complaints, or comments you may have in this regard.

The request to exercise ARCO Rights must include a clear and precise description of the right you wish to exercise and the Personal Data with respect to which you seek to exercise it. The request may be submitted in writing, which must be signed at the end and initialed at the bottom of each page, and must be submitted along with the following documentation for authentication purposes:

- a. Identification data, as well as a copy of a valid official identification (valid official photo identification).

- b. In cases where ARCO Rights are exercised through a legal representative, the representative's official identification must be included, as well as the corresponding power of attorney notarized by a public notary, accrediting the legal representation granted by the Data Subject.
- c. An address to hear and receive our response and, if applicable, future communications and/or notifications, or your wish for our reply and/or future notifications or replies to be sent via email, indicating the respective account.
- d. When you wish to exercise the right to rectification, you must provide the documentation that proves the requested change in accordance with the Personal Data to be rectified, as well as mention the modifications to be made.
- e. Any other element or document that facilitates the location of your personal data.

A response will be provided to any of your requests within a period not exceeding 20 (twenty) business days from its receipt.

If your request is deemed valid, it will be made effective within the 15 (fifteen) business days following the date on which we communicate our response, in accordance with the provisions of the PD Legislation.

These time periods may be extended once for an equal period, provided that the circumstances of the case so justify, of which we will inform you via notification.

If the request to exercise ARCO Rights pertains to the exercise of the right of access, we will make your information or Personal Data available to you through simple copies and/or electronic documents.

As the Controller, we may deny the exercise of ARCO Rights in the cases permitted by the DP Legislation, in which case you shall be informed of the reason for said denial. The denial may be partial, in which case we will carry out the access, rectification, cancellation, or opposition with respect to the applicable part.

The Controller undertakes to comply with all the provisions of the Law and to observe at all times the principles of lawfulness, consent, information, quality, purpose, loyalty, proportionality, and responsibility contained therein.

The Controller shall take reasonable organizational and technical security measures to prevent the loss, misuse, alteration, or unlawful disclosure of your information and Personal Data, which we require to be fulfilled by the service providers we contract, including in the case of services provided by the Controller's subsidiary or affiliated companies.

The Controller wishes to keep your Personal Data updated at all times. Therefore, we request your cooperation to promptly communicate any change we should consider, in order to incorporate it into our databases. The Data Subject guarantees and is responsible, in any case, for the truthfulness, accuracy, validity, and authenticity of their personal data or that of any third party under their custody or legal representation.

14. Options to Revoke or Limit the Processing of Your Personal Data

You, as the Data Subject, may revoke or limit your consent for the processing of your Personal Data by following the same procedure as for the exercise of your ARCO Rights, with the understanding that once your request is at our disposal, we will issue our response within a period not exceeding 5 (five) business days. We remind you that not in all

In such cases, your request will be granted, or we may cease use immediately, as it is possible that we may be required by a legal obligation to continue processing your Personal Data.

15. Modifications to the Privacy Notice

This Privacy Notice may be subject to modifications, changes, or updates arising from the Controller's own needs; for the products or services we offer; from our privacy practices; from changes in our business model, or for other reasons; as well as from updates in applicable legislation.

The updated version will be available to the public through any of the following means:

- On our website, which we suggest you visit frequently.
- We can send it to the last email address you have provided to us.

16. Acceptance

By this Privacy Notice being made available and/or upon you providing us with your Personal Data, and with no manifestation of opposition by the Data Subject, it shall be understood that the Data Subject grants the Controller consent to carry out the processing of the Personal Data that has been provided and/or that which may be provided in the future for any of the purposes established herein.

It is important to note that when the processing of your Personal Data is for the purpose of providing our services to you and complying with our obligations to you, under the terms of the DP Legislation, it is not necessary to obtain your consent for the processing thereof for such purposes.

Last update date of the Privacy Notice: August 2023.

CCLA

Access, Rectification, Cancellation, or Opposition Request Form

- Items marked with an asterisk are mandatory.

1. Full name of the Data Subject (person to whom the Personal Data belongs or refers) *

First name(s)	First last name	Second last name

If applicable, full name of the representative:

First name(s)	First last name	Second last name

The identity of the Data Subject and, where applicable, the representative, must be proven prior to exercising the right. In the case of a representative, their legal authority must also be proven. Attach a power of attorney, as well as photocopies of the documents that prove the identity of the legal representative (valid official identification with a photograph).

2. If applicable, indicate if the data belongs to a person who is:

- ☐ A minor
- ☐ Legally interdicted or incapacitated
- ☐ Deceased

_____ and/or

☐ Address:

Street	Exterior No.	Interior No.
Neighborhood	Mayoralty / Municipality	Town/City
Postal Code	Federal Entity	Country

8. Additional contact information (optional):

Landline or cell phone: _____

The Controller has a maximum period of 20 (twenty) business days, which may be extended by 20 (twenty) more business days when the case so warrants, with prior notification to the Data Subject, counted from the date this request is received, to inform the Data Subject of the determination adopted, so that, if appropriate, said determination shall become effective within the fifteen days following the date on which the response is communicated to the Data Subject.

In the event that you are not satisfied with the response provided by this Institution to this request, you may turn to the Instituto Federal de Acceso a la Información y Protección de Datos (INAI). For more information visit www.inai.org.mx.