IT SERVICES

COMPREHENSIVE

Privacy Notice

PRIVACY NOTICE related to the personal data processed by MASNEGOCIO.COM, S.A.P.I. DE C.V., SIXSIGMA NETWORKS MÉXICO S.A. DE C.V., SM4RT SECURITY SERVICES, S.A. DE C.V. (hereinafter jointly or individually referred to as "KIO ITS").

1. General

1.1. **KIO ITS** is a group of companies committed to and respectful of the rights concerning personal data recognized in Article 16, second paragraph, of the Political Constitution of the United Mexican States, as well as the provisions of the Federal Law on the Protection of Personal Data Held by Private Parties, its Regulations, and other applicable laws and regulations.

Accordingly, and in compliance with such provisions, this Privacy Notice is made available to you.

1.2. This Privacy Notice is available on the website whose domain name is: www.kio.tech, hereinafter referred to as the ***"KIO ITS WEBSITE"***.

1.3. If the **DATA SUBJECT** provides KIO with personal data, such data shall be processed in accordance with this Privacy Notice.

2. Identity and address of the controller processing personal data

2.1. As applicable, the controllers responsible for processing personal data are: **MASNEGOCIO.COM, S.A.P.I. DE C.V., SIXSIGMA NETWORKS MÉXICO S.A. DE C.V., SM4RT SECURITY SERVICES, S.A. DE C.V.** (referred to in this Notice jointly or individually as **"KIO ITS"**, as applicable), which undertake to comply with this Privacy Notice (hereinafter, the **"Notice"**), made available pursuant to the Federal Law on the Protection of Personal Data Held by Private Parties (hereinafter identified interchangeably as the **"Law"** or **"LFPDPPP"**) and its respective Regulations. This Notice applies to personal data obtained by KIO ITS from candidates, personnel, clients, prospective clients, suppliers, prospective suppliers and/or business partners, participants in events and/or training sessions organized by KIO ITS, visitors to its website, and visitors to its physical premises.

2.2. For purposes of this Privacy Notice, the controllers listed in the preceding section have the following addresses for receiving any notices or communications related to this Privacy Notice:

Sixsigma Networks México, S.A. de C.V.: Prolongación Paseo de la Reforma No. 5287, Cuajimalpa, CP. 05000, Mexico City.

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MasNegocio.com, S.A.P.I. de C.V.: Avenida de los Insurgentes Sur No. 2375, Floor 4, Col. Tizapán, Álvaro Obregón, C.P. 01090, Mexico City.

Sm4rt Security Services, S.A. de C.V.: Calle Guillermo Haro SN, Santa Fe, Álvaro Obregón, C.P. 01376, Mexico City.

3. Definitions

3.1. Data Subject. The person to whom the personal data relates.

3.2. Controller. A private individual or legal entity (KIO ITS) that processes personal data.

3.3. Processor. The individual or legal entity that, alone or jointly with others, processes personal data on behalf of the Controller.

3.4. Processing. Any operation or set of operations carried out by manual or automated procedures applied to personal data, related to the collection, use, or storage, possession, access, exploitation, disclosure, transfer, or disposition of personal data.

3.4.1. Transfer. Any communication of personal data within or outside Mexican territory to a person other than the data subject, the controller, or the processor.

3.4.2. Transmission. The communication of personal data between the controller and the processor, within or outside Mexican territory.

3.5. ARCO Rights. Rights of Access, Rectification, Cancellation, and Objection.

3.6. Implied Consent. The **DATA SUBJECT** shall be deemed to have consented to the processing of personal data when, after the Privacy Notice has been made available, the Data Subject does not express opposition, as provided in Article 7 of the Federal Law on the Protection of Personal Data Held by Private Parties.

3.7. Primary Purposes. The purposes for which personal data is primarily requested and which are essential for KIO ITS to be able to comply with its legal or contractual obligations in its relationship with the **DATA SUBJECT**.

3.8. Secondary Purposes. Purposes that are not essential to the relationship between KIO ITS and the **DATA SUBJECT**.

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3.9. Personnel. For purposes of this Notice and any related corporate documents, including without limitation any privacy policy or notice derived from it, the term "Personnel" is used as a reference and includes, without distinction: (i) personnel assigned to KIO ITS by third parties under specialized services agreements pursuant to Article 13 of the Federal Labor Law; (ii) professional service providers or independent contractors; (iii) professional residents, social service providers, or interns; or (iv) KIO ITS personnel with an employment relationship.

4. Personal data processed

4.1. KIO ITS may obtain, directly and/or through Processors, the following personal data:

4.1.1. Candidates. Curriculum Vitae, which may include the following data:

General: Full name, sex, nationality, marital status, date and place of birth, image or photograph, official photo identification, passport, driver's license number, email address, landline telephone, mobile telephone, social security number, Afore, Unique Population Registry Code (CURP), Federal Taxpayer Registry (RFC), address (postal code, state, country, city or municipality, neighborhood, locality, cross streets, street and exterior and interior number), signature, and references.

Academic: Education level and proof of studies, school, study period, language proficiency and computer and office equipment skills, training courses, certifications, experience, competencies, and skills.

Personal references (for which the Data Subject represents that consent has been obtained to share the personal data of such third parties): name, address (postal code, state, country, city or municipality, neighborhood, locality, cross streets, street and exterior and interior number), landline and mobile telephone, occupation, kinship or relationship, length of acquaintance, and reason for knowing the person.

Employment references: length of acquaintance and reason for knowing the person, companies where the person has worked, names of immediate supervisors, salaries received, telephone numbers, and reasons for leaving.

Family data: names, age, education, telephone number, and occupation of parents, siblings, children, and spouse; emergency contact information.

Financial Data: socioeconomic study, bank accounts, current expenses, acquired services and credit, income and expense levels, property, real estate and debts, compensation, and benefits.

Copies of documentation: Job application, Curriculum Vitae, Tax Status Certificate, CURP (Unique Population Registry Code), FM (Immigration Form), official photo identification

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(INE, Passport), birth certificate, IMSS documentation, proof of address, professional license or proof of studies, certifications, and letters of recommendation.

4.1.2. Personnel

As applicable to the type of relationship the Data Subject maintains with KIO: Full name, sex, nationality, marital status, age, image or photograph, signature, fingerprint, biometric data, social security number, Afore, date and place of birth, passport, driver's license number, landline and mobile telephone numbers, address (postal code, state, country, city or municipality, neighborhood, locality, cross streets, street and exterior and interior number), email address, current studies, language proficiency and computer and office equipment skills, personal and employment references - for which the Data Subject represents that consent has been obtained to share the personal data of such third parties - (name, telephone number, length of acquaintance, and reason for knowing the person), education, highest level of studies, professional license or proof of studies, vehicle license plate and make, bank account information, and emergency contact information.

With respect to medical examinations (Check-Up) that may eventually form part of the compensation or benefits package granted to personnel, the resulting information shall be known exclusively by the Data Subject.

Copies of documentation. As applicable to the type of relationship the Data Subject maintains with KIO ITS: Curriculum Vitae, official photo identification (INE, Passport), proof of address, birth certificate, Tax Status Certificate, CURP (Unique Population Registry Code), FM (Immigration Form), professional license or proof of studies, certifications, recent training, IMSS (Mexican Social Security Institute) documentation, letters of recommendation, bank statement showing the CLABE account number, and, if applicable: INFONAVIT loan documentation, marriage certificate, and birth certificate(s) of child(ren).

4.1.2.1. Personnel assigned to projects.

As applicable to the type of relationship the Data Subject maintains with KIO ITS and when assigned to work on any KIO ITS project, in addition to the personal data collected under Section 4.1.2., the following shall be requested: Special Credit Bureau Report.

4.1.3. Clients.

Full name, image or photograph, RFC, signature, official photo identification, local and/or mobile telephone numbers, email address, address - postal code, state, country, city or municipality, neighborhood, locality, cross streets, street, exterior and interior number - and billing address - postal code, state, country, city or municipality, neighborhood, locality, cross streets, street, exterior and interior number -, bank account cover sheet, and tax information. Where applicable, personal data of individuals related to a legal entity; as well as the data and/or documents

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necessary to follow up on the contractual/commercial matters linking the company with KIO ITS.

Copies of documentation. Official photo identification, company's articles of incorporation, legal power of attorney of the representative registered with the Public Registry of Property and Commerce, Tax Status Certificate, and proof of address.

4.1.4. Suppliers.

Prospective Suppliers and Suppliers. Full name, photograph, tax information, bank account cover sheet, signature, advanced electronic signature, email address, landline and mobile telephone, address - postal code, state, country, city or municipality, neighborhood, locality, cross streets, street and exterior and interior number, Tax Status Certificate; company for which the person works, position held, company telephone numbers and email addresses, company address - postal code, state, country, city or municipality, neighborhood, locality, cross streets, street and exterior and interior number -, billing information (corporate name, Federal Taxpayer Registry, electronic invoice, bank details, bank name, account and CLABE account, SWIFT, ABBA in the case of international transfers). Likewise, KIO ITS may request a curriculum vitae and personal and business references.

Copies of documentation for Suppliers that are legal entities. Official photo identification of the supplier's legal representative, Tax Status Certificate, bank statements, proof of address, signed Anti-Corruption Declaration, signed Privacy Notice, signed Annual Certificate of Third-Party Intermediary or Business Partner, tax returns for fiscal periods in the current year, articles of incorporation, public deed containing the legal representative's power of attorney, financial statements, and audited financial statements.

Copies of documentation for Suppliers that are individuals. Current official identification, Tax Status Certificate, proof of address, tax return, bank statements, signed Anti-Corruption Declaration, signed Privacy Notice, and signed Annual Certificate of Third-Party Intermediary or Business Partner, bank statements, and tax returns.

4.1.5. Participants in events and/or training sessions organized by KIO ITS.

Full name, sex, email address, social media accounts, landline telephone, and mobile telephone.

4.1.6. Visitors to the KIO ITS WEBSITE.

Full name, company name, position, email address, telephone, country, state, city, and visitor IP address; where applicable, information generated through the operation of cookies, web beacons, or similar technologies, as provided in this Privacy Notice.

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4.1.7. Visitors to the physical premises of KIO ITS.

Name, official photo identification, company where the visitor works, person being visited, image or photograph and, where applicable, visitor audio captured through video surveillance services.

4.2. With respect to non-sensitive data, as well as financial and asset data processed for Primary Purposes so that KIO ITS may comply with legal or contractual obligations in relation to the **DATA SUBJECT**, KIO ITS assumes it has the Data Subject's implied consent for such processing, pursuant to Articles 7 and 9 of the LFPDPPP, unless the Data Subject expressly objects to the processing, in which case such objection shall have the scope provided under the applicable legal provisions.

4.3. The **DATA SUBJECT** is responsible for the truthfulness and accuracy of the data provided to KIO ITS, where applicable.

4.4. KIO ITS states that it may obtain the **DATA SUBJECT's** personal data from publicly accessible sources in order to validate, update, and contact the **DATA SUBJECT**, while at all times respecting the reasonable expectation of privacy referred to in Article 6 of the LFPDPPP.

4.5. KIO ITS may use IP (Internet Protocol) information to analyze any type of threat to the **KIO ITS WEBSITE**, as well as to collect demographic information. However, IP information shall under no circumstances be used to identify Data Subjects, except where fraudulent activity is likely.

5. Use of "Cookies" and "Web beacons"

5.1. The **KIO ITS WEBSITE** or other KIO ITS sites usually use "cookies" in connection with certain features or functions. Cookies are specific types of information that a website transmits to the hard drive of the **DATA SUBJECT's** computer for recordkeeping purposes. Cookies may facilitate use of a website by saving passwords and preferences while the **DATA SUBJECT** browses the Internet.

5.2. "Web beacons" are images embedded in a website or email that may be used to monitor a visitor's behavior, such as storing information regarding the User-DATA SUBJECT's IP address, the duration of interaction on that page, and the type of browser used, among other information.

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Although most browsers automatically accept "cookies" and "web beacons," the **DATA SUBJECT** may configure the browser not to accept them.

5.3. The **KIO ITS WEBSITE** may use "cookies" to improve the web experience. The **DATA SUBJECT** may change the "cookie" settings at any time by disabling the options for "Social media cookies" - used by social media "share" buttons - and "Functional cookies" - which allow KIO ITS to analyze use of the site so it can measure and improve performance. However, the **DATA SUBJECT** may not disable "Required cookies," as they are necessary for the proper operation of the site.

5.4. To disable "cookies," follow these instructions:

a) Microsoft Edge: Manage cookies in Microsoft Edge: View, allow, block, delete and use

b) Firefox: Disable third-party cookies | Firefox Help;

c) Opera: How to manage cookies in Opera - Blog;

d) Safari IPAD: http://manuals.info.apple.com/en_US/iPad_iOS4_User_Guide.pdf;

e) Safari IPHONE: Clear Safari history, cache, and cookies on iPhone - Apple Support (MX); and

f) Chrome: Delete, allow, and manage cookies in Chrome - Android

6. Purposes of personal data processing

6.1. KIO ITS, by itself or through Processors, shall process personal data for the Primary Purposes necessary for KIO ITS to comply with its legal or contractual obligations in its relationship with the Data Subject; and in particular, may process the **DATA SUBJECT's** personal data, as applicable according to the type of relationship with such person, for the following purposes:

6.1.1. DATA SUBJECT-Candidate:

a) Evaluate the candidate's suitability for possible vacancies; contact the DATA SUBJECT-Candidate by any means in order to follow up on and evaluate the DATA SUBJECT-Candidate's experience and studies, and determine the feasibility of selection for the position sought.

b) Conduct background and reference investigations or verifications of the candidate and, where applicable, socioeconomic studies of the DATA SUBJECT-Candidate. The candidate's personal data contained in the

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socioeconomic reports shall be retained for a period of up to 1-one year from the time they are obtained.

c) Learn about the DATA SUBJECT-Candidate's work experience, as well as the knowledge, competencies, and skills relevant to the position being filled.

d) Create a file for the DATA SUBJECT-Candidate, to be stored at the KIO ITS offices in electronic format for up to 1-one year from the date it is obtained if the candidate is not selected for the position sought.

e) Where applicable, share the information provided by the candidate with third parties (job boards, placement agencies, or similar entities), if the Data Subject consents.

6.1.2. DATA SUBJECT-Personnel (as applicable according to the type of relationship the Data Subject maintains with KIO ITS):

a) Create a physical and/or digital file for the DATA SUBJECT-Personnel, to be stored at the KIO ITS premises.

b) Carry out the necessary registration, termination, modification, and medical leave procedures before IMSS and any other government institutions where required.

c) Carry out the necessary procedures to obtain a debit card for the deposit of salary and other benefits accrued in favor of the DATA SUBJECT-Personnel.

d) Process and deliver a corporate credit card where required by the job description.

e) Support the DATA SUBJECT-Personnel in comprehensive development, fostering social awareness and professional commitment through innovative, agile, consistent, and flexible IT projects.

f) Carry out the salary and benefit payment process for the DATA SUBJECT-Personnel, as well as deductions for child support or alimony required by court order.

g) Deliver uniforms determined by KIO ITS to be necessary for the performance of work activities.

h) Maintain attendance and worksite entry and exit time records for the DATA SUBJECT-Personnel through access credentials. Such records shall be retained throughout the employment relationship and for up to 6-six months after the employment relationship ends.

i) Arrange with airlines and hotels any business travel required by the DATA SUBJECT-Personnel.

j) Issue employment certificates requested by the DATA SUBJECT-Personnel.

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k) Enroll the DATA SUBJECT-Personnel in courses, seminars, workshops, or any other training organized by third parties and related to the activities or business of KIO ITS.

l) Prepare letters or agreements for the assignment of work tools required by the DATA SUBJECT-Personnel to perform work activities.

m) Process applicable insurance (such as life, major medical expenses, dental, among others, as applicable) and a grocery voucher card.

n) Provide fuel supply services for vehicles used by the DATA SUBJECT-Personnel in performance of work obligations.

o) Present the DATA SUBJECT-Personnel file to demonstrate compliance with processes in quality or accounting audits periodically conducted on KIO ITS by third parties certified in the corresponding field.

p) Provide professional recommendations for the DATA SUBJECT-Personnel or references concerning the person and their work or professional performance during the period of the relationship, for up to 1-one year after the relationship ends.

q) For informational or corporate communication purposes (newsletters, circulars, or internal communication media) relating to events, campaigns, or notices, which may include, as applicable, photographs, interviews, and mentions in media or social networks.

r) Process personal information to the extent necessary or appropriate to enable KIO ITS to comply with its legal or contractual obligations to personnel and clients, depending on the type of legal relationship with the Data Subject.

s) Identify and analyze psychosocial risk factors, evaluate the organizational environment, and detect severe traumatic events involving the DATA SUBJECT-Personnel at work.

The personal data of personnel referred to in this section shall be retained by KIO ITS in physical and electronic format for up to 10-ten years after the employment relationship ends, or for the applicable legal periods according to the type of relationship that links or linked the Data Subject with KIO ITS.

6.1.3. DATA SUBJECT-Client or Prospect:

a) Contact DATA SUBJECT-Clients by any means, including telephone, email, or social media, to respond to and follow up on requests for information, services, and/or products offered and/or marketed by KIO ITS.

b) Administer and provide the service offered by KIO ITS, as well as technical support to the Client or Prospect.

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c) Contact the DATA SUBJECT-Client by any means to make clarifications and follow up on payments or any other situation arising from the products and/or services provided by KIO ITS, such as complaints or comments regarding them.

d) Contact the DATA SUBJECT-Client to manage and collect outstanding debts; where applicable, contact the persons whom the DATA SUBJECT has authorized as payment contacts.

e) Register them in the accounting system so that authorized persons may access the personal data.

f) Issue electronic invoices and credit notes arising from the products and/or services offered by KIO ITS. Such invoices, in physical and/or electronic format, and the credit notes, shall be retained by KIO ITS for the duration of the commercial relationship and for up to 10-ten years after it ends.

g) Store in different databases the information of clients or prospects who contact KIO ITS by telephone or email to make inquiries or request products and/or services; such records shall be stored for a period of 1-one year from the date obtained if no product and/or service has been sold.

h) Carry out transactions with credit institutions arising from commercial operations.

i) Register them in the software systems known as SIAV MÉXICO, SIOS, SIAA, SPI, SAP, as well as software for generating and sending electronic invoices and encrypted electronic documents, so that authorized persons may access the personal data.

j) Notify the Client or Prospect of changes to the service offered by KIO ITS.

k) Coordinate meetings with DATA SUBJECT-Clients by telephone, email, or any other means, whether in physical or digital format.

l) Provide attention and follow-up to sales through Internet portals and exhibitions.

m) Create a record in KIO ITS's "clients" and/or prospects database, which shall be retained for the duration of the commercial relationships and for 1-one year after they end.

n) For registration, administration, and management of purchase, work, or service orders, as well as payment mechanisms, through information technology platforms.

o) For informational or corporate communication purposes relating to events, campaigns, or notices, which may include, as applicable, photographs, interviews, and mentions in media or social networks (for example, in the context of success stories, client experiences, or similar matters).

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p) Process personal information to the extent necessary or appropriate to enable KIO ITS to comply with its legal or contractual obligations to personnel, depending on the type of legal relationship with the Data Subject.

6.1.4. DATA SUBJECT-Supplier:

a) Contact DATA SUBJECT-Suppliers by telephone or email to request or follow up on requests for information, products, and/or services required.

b) Contact the DATA SUBJECT-Supplier by any means to make clarifications and follow up on payments or any other situation arising from services required by KIO ITS.

c) Register them in the accounting system, or any future system that replaces it, so that authorized persons may access the personal data.

d) Retain for up to 10-ten years from the date generated the electronic invoices and credit notes, in both physical and electronic format, arising from the products and/or services required by KIO ITS.

e) Retain for a period of 10-ten years the agreements entered into by KIO ITS with its suppliers, in both physical and electronic format, after such agreements have ended.

f) Make bank transfers and rectify data in connection with requests for products and/or services.

g) Verify the Supplier's personal and business references, and conduct verification or investigation of the Supplier's background, conduct, and/or business reputation, either directly or through Processors providing services for such purpose.

h) Where applicable, transmit Supplier information to Processors hired by KIO ITS that provide KIO ITS with information processing services for administrative purposes, integrated management systems (including without limitation billing and payment systems), and statistical and control purposes.

i) For registration, administration, and management of purchase, work, or service orders, as well as payment mechanisms, through information technology platforms.

j) For informational or corporate communication purposes relating to events, campaigns, or notices, which may include, as applicable, photographs, interviews, and mentions in media or social networks.

k) Process personal information to the extent necessary or appropriate to enable KIO ITS to comply with its legal or contractual obligations to personnel, depending on the type of legal relationship with the Data Subject.

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6.1.5. DATA SUBJECT-Participant in events and/or training sessions organized by KIO ITS:

a) Register the DATA SUBJECT-Participant as an attendee at events and/or training sessions organized by KIO ITS.

b) Confirm attendance and allow the DATA SUBJECT-Participant to enter the physical or virtual rooms where events and/or training sessions organized by KIO ITS are held.

c) Store in different databases, in physical or electronic format, information regarding participants in events and/or training sessions organized by KIO ITS.

d) Send information regarding schedules, venue, agenda, speakers, and any changes thereto to participants in events and/or training sessions organized by KIO ITS.

e) Where KIO ITS deems it appropriate, send invitations, promotions, or information regarding its products or services, either directly by KIO ITS or through any third party acting as a Processor.

f) For informational or corporate communication purposes relating to the relevant event and/or training session, which may include, as applicable, photographs, interviews, and mentions in media or social networks.

This information may be retained by KIO ITS for up to 2-two years after the event and/or training session takes place.

6.1.6. DATA SUBJECT-Visitor to the KIO ITS WEBSITE:

a) Store in different databases, in physical or electronic format, information regarding clients or prospects who contact KIO ITS by telephone, email, or social media to make inquiries or request quotations for products and/or services marketed; such records shall be stored for a period of 1-one year from the date obtained, provided commercial transactions with KIO ITS are not completed.

b) Send information or quotations following a request made by the DATA SUBJECT-Visitor through the form available on the KIO ITS website under the "Contact Us" tab.

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6.1.7. DATA SUBJECT-Visitor to the physical premises of KIO ITS:

a) Store in databases, in physical and/or electronic format, the data and image of visitors to KIO ITS premises for the purpose of issuing access badges and maintaining control of entries and exits by persons visiting the facilities, as part of the security and protection measures adopted within the organization. Images stored through video surveillance systems shall be retained for a period of 30 days from the date of capture. The other data requested from visitors may be retained for up to 1-one year from the time obtained.

7. Other provisions

7.1. With respect to the personal data of the **DATA SUBJECT** that it processes, KIO ITS undertakes to observe the principles of legality, consent, information, quality, purpose, loyalty, proportionality, and accountability.

7.2. KIO ITS shall cancel the **DATA SUBJECT's** personal data once the purposes for which the data was processed have been fulfilled, except where this Notice or the law provides a different specific period.

7.3. KIO ITS undertakes to contract only cloud services from providers that meet the requirements established in the Regulations of the LFPDPPP.

7.4. The **DATA SUBJECT's** personal data may be used for the following Secondary Purposes, as applicable to the relationship linking the DATA SUBJECT with KIO ITS:

a) Generate information for the KIO ITS website.

b) Send newsletters or periodic communications, directly or through Processors, concerning current topics related to products and/or services offered by KIO ITS, or for other marketing or commercial prospecting purposes.

c) Evaluate the opinions of Data Subjects and the quality of products and/or services offered by KIO ITS.

d) Send emails containing information about events organized by or related to KIO ITS and/or third parties; (ii) prepare statistical study reports and demographic reports using data dissociated from the DATA SUBJECTS.

e) Send communications relating to services, job openings, promotions, event sponsor information, and security updates.

f) Send information regarding technical and administrative support services provided by KIO ITS.

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g) For informational or corporate communication purposes relating to events, campaigns, or notices, which may include, as applicable, photographs, interviews, and mentions in media or social networks.

h) Other purposes that are not essential for KIO ITS to comply with its legal or contractual obligations in its relationship with the **DATA SUBJECT**.

7.5. If the **DATA SUBJECT** does not want KIO ITS to use personal data for the Secondary Purposes set forth in the preceding subsection, the **DATA SUBJECT** has a period of 5-five business days to express, where applicable, refusal to allow processing of personal data for purposes that are not necessary and did not give rise to the legal relationship with KIO ITS. For this purpose, KIO ITS makes available an email address to which the request to opt out of personal data processing must be sent: **protecciondedatos@kio.tech**

8. Limitations on access to and disclosure of personal data

8.1. Additionally, you are informed that, in order to avoid receiving promotional messages or advertising from KIO ITS, you may request this in writing at **protecciondedatos@kio.tech**. With respect to advertising made by telephone, you may also register with the Public Registry to Avoid Advertising. For more information, you may review the website of the Federal Consumer Protection Agency (PROFECO), available at https://repep.profeco.gob.mx/.

9. Security Measures.

9.1. KIO ITS protects the security of personal data by applying physical, administrative, and technological security measures substantially similar to those used to protect its own confidential information, in compliance with the legal standards of the applicable laws. Any personal databases have limited access and are located in controlled facilities with security mechanisms, and are treated as confidential.

9.2. Notwithstanding the foregoing, if security breaches occur at any stage of processing that significantly affect the property or moral rights of the DATA SUBJECTS, they shall be informed immediately by email so that such DATA SUBJECTS may take the corresponding measures to defend their rights, and KIO ITS shall be released from any liability if the breach is not attributable to it.

10. Person designated to process requests

10.1. If the **DATA SUBJECT** wishes or needs to revoke consent, as well as Access, Rectify, Cancel, or Object to the processing of personal data

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that has been provided, this must be done through the person designated by KIO ITS, whose details are described below:

Designated person: ARCO Rights Coordinator

Email: protecciondedatos@kio.tech

11. Means to revoke consent

The **DATA SUBJECT** of the personal data may revoke the consent granted by acceptance of this Notice. Revocation of consent granted by electronic means must be carried out by following the procedure below and using the following form for exercising rights:

11.1. Send an email to the attention of the Designated Person identified in Section 8.1 of this Notice, through which such requests shall be handled.

11.2. Send a request or data message to the email address specified above, stating:

1. The **DATA SUBJECT's** full name, address, and email address for receiving the response generated as a result of the request;
2. The reason for the request;
3. The arguments supporting the request or petition;
4. Official document proving identity and demonstrating that the person is who they claim to be; and
5. Date as of which revocation of consent becomes effective.

11.3. KIO ITS shall notify the Data Subject, within a maximum period of 20-twenty business days from the date on which the request concerning exercise of ARCO rights was received, of the decision adopted, so that, if appropriate, it may be made effective within the following 15-fifteen business days from the date the response is communicated, by means of a message stating that all actions aimed at ceasing processing of the **DATA SUBJECT's** personal data have been carried out.

12. Means to exercise ARCO rights

12.1. If the **DATA SUBJECT** needs to Access, Rectify, Cancel, or Object regarding the personal data provided to KIO ITS, the **DATA SUBJECT** shall have available the following form for exercising rights and must follow this procedure:

1. Send an email to the attention of the person Designated by KIO ITS in Section 8.1 of this Notice, through which such requests shall be handled, stating the following:

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(a) The **DATA SUBJECT's** full name, address, and email address for receiving the response generated as a result of the request;

(b) The reason for the request;

(c) The arguments supporting the request or petition;

(d) Official document proving identity (and, where applicable, that of the representative or attorney-in-fact);

(e) A clear and precise description of the personal data with respect to which any ARCO right is sought to be exercised, and any other element or document that facilitates locating the personal data.

12.1.1. In the case of requests to rectify personal data, the **DATA SUBJECT** must also indicate the modifications to be made and provide the documentation supporting the request.

12.1.2. KIO ITS shall notify the Data Subject, within a maximum period of 20-twenty business days from the date on which the request for access, rectification, cancellation, or objection was received, of the decision adopted, so that, if appropriate, it may be made effective within the following 15-fifteen business days from the date the response is communicated.

12.1.3. In the case of requests for access to personal data, delivery shall proceed after the identity of the applicant or legal representative, as applicable, has been verified.

13. Transmission and transfer of personal data

13.1. KIO ITS undertakes not to transfer the data referred to in this Notice to Third Parties, except with the Data Subject's prior consent or in the circumstances provided in Article 36 of the Federal Law on the Protection of Personal Data Held by Private Parties.

13.2. In fulfillment of the purposes of this Notice, or of its legal or contractual obligations, KIO ITS may transmit data to Processors, pursuant to Articles 50 and 51 of the Regulations of the LFPDPPP, or any provision that may replace them.

13.3. In this regard, KIO ITS undertakes to take the measures necessary to ensure that the Processors it engages comply with the purposes established in this Notice.

14. Amendments

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This Privacy Notice may be amended at such time and in such manner as KIO ITS determines, taking into account developments and regulations that arise in the field of personal data protection. KIO ITS therefore undertakes to keep this Notice updated for consultation on the **KIO ITS WEBSITE**, so that, where applicable, the **DATA SUBJECT** is able to exercise ARCO rights.

15. Specific notes

15.1. Sixsigma Networks México, S.A. de C.V.: Services contracted with KIO in connection with data analytics may involve the transmission of personal data to Processors. By their nature, such services may involve the processing of personal information, the scope of which is known and consented to by the contracting client in accordance with the contractual provisions established for that purpose.

15.2. Sm4rt Security Services, S.A. de C.V.: Services contracted with KIO may involve the transmission of personal data to Processors in connection with SOC (Security Operations Center), Vulnerability Management, Privacy Impact Analysis, or similar services. By their nature, such services may involve the processing of personal information, the scope of which is known and consented to by the contracting client in accordance with the contractual provisions established for that purpose.

15.3. Please note that contracting for or using services involving Artificial Intelligence systems may, by their very nature, involve the processing of personal data in accordance with the product terms that may apply to such systems.

16. Supervisory authority

If you believe that your right to protection of personal data has been harmed by any act or omission on our part, or suspect any violation of the provisions of the Federal Law on the Protection of Personal Data Held by Private Parties, its Regulations, and other applicable provisions, you may file a complaint or report with the Secretariat of Anti-Corruption and Good Governance. For more information, we suggest visiting its official website: Secretariat of Anti-Corruption and Good Governance | Government | gob.mx https://www.gob.mx/buengobierno

17. Important section on processing sensitive personal data

In the event of a public health emergency, KIO ITS may process sensitive data of Data Subjects - specifically, concerning their health condition - or personal information about their social context (such as travel history; usual means of transportation; references to infection or suspected infection within the family or social circle; places frequented; behaviors representing possible risk situations), obtained directly from the Data Subjects or transmitted by Processors, with the Data Subjects' prior express written consent. In such cases, KIO ITS shall process the information solely for the purpose of having sufficient elements to make decisions leading to the prevention of contagion or the adoption of actions to

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safeguard the public health interests of its personnel, visitors, suppliers, clients, and the general public. KIO ITS shall process information concerning the Data Subjects' personal data in a strictly confidential manner and shall not transfer it to third parties.

In the event of a psychosocial risk, KIO ITS shall process sensitive personal data of the Data Subjects concerning their mental and emotional health condition, history of exposure to severe traumatic events, levels of stress and anxiety, sleep disturbance, as well as individual perceptions of workload. This is in compliance with NOM-035-STP-2018.

17. Applicable law and jurisdiction

This Notice is governed by the legal provisions applicable in the Mexican Republic, in particular the Federal Law on the Protection of Personal Data Held by Private Parties, its Regulations, and other applicable provisions.

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