

PRIVACY NOTICE

KURI BREÑA, SÁNCHEZ UGARTE Y AZNAR, S.C.

I. Identity and address of the entity responsible for the processing of your personal data.

Kuri Breña, Sánchez Ugarte y Aznar, S.C., hereinafter (“KSA”), domiciled at Prol. Paseo de la Reforma 1015, Torre B, Piso 8, Col. Desarrollo Santa Fe, C.P. 01376, Mexico City, is the legal entity responsible for processing your personal data in accordance with the Federal Law on the Protection of Personal Data in the Possession of Private Entities (the “Law”), its Regulations, and the Guidelines for Privacy Notices published in the Official Gazette of the Federation (*Diario Oficial de la Federación*) on January 17th, 2013.

Contact Information for the Personal Data Department:

Email: datospersonales@ksa.mx

Phone: (52) 55 5292-5930

Attention: Sandra Concha Radillo

KSA, as the entity responsible for processing your personal data, is obligated to comply with the principles of legality, consent, information, quality, purpose, loyalty, proportionality, and accountability protected under the Law. In compliance with Articles 13 and 14 of the Law, KSA commits to maintaining strict confidentiality of your personal data and to implementing administrative, technical, and physical security measures to protect it against any damage, loss, alteration, unauthorized access, or processing.

For KSA, the legitimate processing of your data is a priority. This Privacy Notice supplements any simplified or short-form privacy notices that KSA may have provided to you and serves as a supplementary notice for matters not expressly addressed in those notices.

II. Personal data that will be processed.

The personal data that KSA may collect includes the following:

Identification data: information that distinguishes you from other individuals. This includes your name, nationality, photograph, or personal identification number, including voter ID (INE), CURP, Federal Taxpayer Registration (RFC), foreign tax identification number, or other tax-related information.

Contact data: information that allows us to stay in contact with you, such as your address, email, home phone number, or other contact numbers like your cell phone.

Financial or asset data: information related to your assets or rights, including banking information, payment details, billing information, and tax compliance opinions.

KSA will not collect sensitive personal data, except for your photograph and financial or asset data as mentioned above. KSA commits to ensuring that sensitive, financial, and asset-related data are treated confidentially. Therefore, KSA requests your consent to process your sensitive, financial, and asset-related data as outlined in this Privacy Notice by signing at the end of this document.

III. Purposes for the processing of your personal data.

The personal data will be processed for the following purposes:

Primary purposes:

- To provide the legal services requested and contracted, as well as related activities, if applicable;
- To inform about changes to our services, if applicable;
- To fulfill obligations to our clients and suppliers, if applicable;
- To comply with regulatory obligations issued by competent authorities and respond to their requests, if applicable;
- For identification purposes in compliance with applicable legislation;
- To fulfill our payment, collection, and invoicing obligations.

Secondary purposes:

- For statistical and/or marketing purposes;
- To occasionally contact you via email to share newsletters, updates about our firm, or topics of general interest for advertising purposes, or to evaluate service quality;
- To inform you about new services related to those previously contracted for advertising purposes, if applicable.

In general, personal data is collected to formalize the relationship between you and KSA, fulfill our contractual obligations, and comply with legal provisions applicable to KSA.

KSA may disclose your personal data to fulfill requests from judicial or administrative authorities.

IV. Mechanisms to express refusal for the processing of your personal data for secondary purposes and to revoke consent.

You can, at any time, express your refusal for the processing of your personal data for secondary purposes or revoke the consent you have given for processing, limiting the use or disclosure of your personal data.

To do so, you must submit a written request signed by you or your legal representative, following the requirements and procedures outlined in Section VI of this Privacy Notice.

V. Options and means offered to limit the use or disclosure of personal data.

At any time, you have the right to limit the use or disclosure of your personal data by submitting a written request to the email provided in the contact section, using the form included as Exhibit “A” to this Privacy Notice, duly signed by you or your representative, as per the requirements outlined in Section VI of this Privacy Notice.

VI. Means to exercise the rights of access, rectification, cancellation, or opposition.

In accordance with the Law, you have the right to (i) **access** your personal data to know what personal data we possess and the details of its processing; (ii) **rectify** inaccurate or incomplete personal data; (iii) **cancel** personal data that is no longer necessary for the purposes it was collected for; and (iv) **oppose** the processing of your personal data, except when it must be retained under the conditions outlined by the Law (collectively, “ARCO Rights”).

Additionally, you have the right to **data portability**, which allows you to (i) receive the personal data you have provided us in a structured, commonly used, and machine-readable format and/or (ii) transmit that data to another data controller, when technically feasible.

We provide you with our form for exercising ARCO Rights, which you may submit in accordance with the procedure described below:

You may exercise your ARCO Rights by submitting a duly signed request, either personally or through your legal representative, to KSA’s address or via the email provided in the contact section of this Privacy Notice. The request must include a copy of the necessary documents to verify your identity or, if applicable, the legal representation. The request should also include the name of the data subject and an email or address where the response to the request can be sent, as well as a clear and precise description of the personal data for which you seek to exercise any of the ARCO Rights mentioned above. KSA will respond to each request within a maximum of 20 (twenty) calendar days from the date of receipt of the ARCO Rights request through the means indicated in the request. If the request is valid, it will be fulfilled within 15 (fifteen) calendar days following the communication of the response. In such cases, KSA will attach simple copies of the information or personal data that

is in the possession of KSA. The aforementioned timeframes may be extended once for an equal period, provided that the circumstances of the case justify the extension.

If you revoke your consent, limit KSA's ability to use or disclose your personal data, oppose or cancel the processing of your personal data, it is possible that KSA may no longer be able to provide services, maintain a business relationship with you, and/or fulfill its payment obligations. KSA may take the necessary measures if your limitation of use or disclosure, revocation of consent, or exercise of your rights to cancel or oppose data processing hinders, disrupts, or in any way affects KSA's processes and practices.

In accordance with Article 34 of the Law, KSA may deny access to personal data, refuse to make corrections or cancellations, and refuse to grant opposition to the processing of personal data when: (i) the requester is not the owner of the personal data or the legal representative is not duly authorized; (ii) the personal data is not found in the database; (iii) the rights of a third party are harmed; (iv) there is a legal impediment or a ruling by a competent authority restricting access to personal data or preventing rectification, cancellation, or opposition; and (v) rectification, cancellation, or opposition has already been carried out previously.

Likewise, under the provisions established in Article 26 of the Law, KSA will not be obligated to cancel your personal data.

VII. Transfers of personal data to third parties.

To fulfill the purposes established in this Privacy Notice, KSA may transfer all or part of your Personal Data, both within and outside the national territory, in the following cases:

- i. With our business partners, contractors, service providers, suppliers, consultants, notaries, public brokers, experts, translators, auditors, insurance companies, and/or advisors of any nature of KSA;
- ii. With authorities or regulators, in which case only the necessary data will be transferred to meet regulatory or contractual requirements, always in compliance with this Privacy Notice;
- iii. In cases where such transfer is necessary to comply with legal, accounting, regulatory, or contractual obligations of KSA.

These transfers are necessary for fulfilling our legal and contractual obligations; therefore, KSA will not require your consent to transfer your personal data to third parties in the cases provided for in Article 37 of the Law, which include transfers that are: (i) foreseen by law or treaty, (ii) necessary for medical prevention or diagnosis, (iii) made to parent companies, subsidiaries, or affiliates under the common control of KSA or within the same group, (iv) necessary by virtue of a contract in the interest of the data subject, (v) in the public interest or for the administration of justice,

(vi) for the exercise of rights in a judicial process, and (vii) for the fulfillment of a legal relationship between KSA and the data subject.

KSA is committed not to transfer your personal information to third parties without your consent when required, and to make transfers in accordance with the terms established by the Law.

VIII. Right to Promote Procedures for the Protection of Rights and Verification Conducted by the Institute.

If you believe that your rights have been violated by any conduct of our employees or by our actions or responses, or if you suspect that your personal data is being processed in violation of the provisions set forth in the Law, its Regulations, or other applicable regulations, you may file a complaint or report with the National Institute of Transparency, Access to Information and Protection of Personal Data (INAI). For more information, visit its official website: www.inai.org.mx.

IX. Procedure and means by which KSA will Inform Data Subjects of Changes to the Privacy Notice.

KSA reserves the right to make modifications or updates to this Privacy Notice at any time, to address legislative or judicial reforms, internal policies, or new internal requirements.

These modifications will be available on the following website: <http://www.ksa.mx>.

Last update: August 1st, 2024.

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I declare that I have read and understood this Privacy Notice. Furthermore, I consent to the processing of my sensitive and non-sensitive personal, financial, and asset-related data in accordance with the terms and conditions set forth in this Privacy Notice.

Name and signature of the data subject

Date