Privacy Notice



Global Conformity Services

GLOBAL CONFORMITY SERVICES, S.C.

Global Conformity Services, S.C. (Global) is committed to protecting privacy and information, to maintain the trust of customers and visitors; we always encourage you to read this Privacy Notice.

This policy aims to ensure the privacy and processing that will be given to the Personal Data provided by the Owner, guaranteeing its confidentiality.

1. Legal Basis

Article 16 of the Political Constitution of the United Mexican States establishes that everyone has the right to the protection of their Personal Data, to access, rectification, and cancellation, as well as to express opposition, regarding the Law's dispositions that regulate cases of exception to the principles governing the data process.

Federal Law for the Protection of Personal Data in the Possession of Private Persons and its Regulations (hereinafter referred as the Law and Regulations) defines the particular legislation governing the above-mentioned constitutional provision, which expresses the scope and general conditions of the processing of the Personal Data of individuals, as well as how to maintain control and informed decision-making.

Global

2. Responsible of Personal Data

Global indicates for the purposes of this Privacy Notice the address located in Amores No. 1155, Col. Del Valle, Alcaldía Benito Juárez, C.P. 03100, Mexico City, and the ownership of the website <u>www.globalcs.mx</u>. Global will be held **Responsible** for all Personal Data provided by the person to whom it belongs (hereinafter the **Owner**) and to guarantee the privacy and right to informative self-determination.

The exercise of the rights of access, rectification, cancellation, opposition, limitation of use or revocation of consent may be requested through the forms and processes indicated in this Privacy Notice.

3. Owner's Personal Data requested

The main purpose of collecting Personal Data is to provide the user a better service satisfying all needs and requirements. Global only collects the essential information to comply with this purpose and to do not manage sensitive data of the Owner.

According with this Privacy Notice, Global may collect non-sensitive Personal Data from the Owner such as:

a. Full name and photograph (official identification, as well as the image of the holder when entering Global premises, through video surveillance and security cameras);

b. Address (proof of address);

c. Fixed telephone number, mobile phone, fax number, e-mail;

d. Nationality, date and place of birth, marital status;

e. Federal Taxpayer Register (RFC or TAX ID) and Unique Population Registration Key (CURP);

f. Professional/labor position, bank account number, economic activity and property information, credit bureau report and general data of economic situation (relation of goods and relation of income);

g. Information about preferences and interests related to Global services;

h. Information generated by other connected or used devices (including personal IP address and device identification data), browsing data, information from the use and consumption of internet services from personal device, as well as information related to the use of third-party applications and services;

i. Voluntary provided information from the Owner to attend complaints, doubts or to request information.

The total data mentioned above will be called as Personal Data, that may be provided by the Owner as follows:

- If the Owner provides them personally or directly;
- If Global obtains them indirectly or through a contact of the Owner;
- If the Owner uses the Internet site or the online services of Global and/or;
- If Global obtains such information by authorized sources according with the current legislation.

It is a responsibility of the Personal Data Owner to provide personally or directly to Global truthful and complete information, and to notify any modification in order to keep it always updated.

4. Purposes of Personal Data

The Owner's Personal Data information collected by Global, might have the following applications:

a. To maintain the legal relationship and complying obligations regarding the provision of services by the Responsible (hereinafter the Services);

b. For due fulfillment of acts, contracts, agreements or obligations concluded between the Responsible and the Owner;

c. To identify the Owner in accordance with the documents and information provided;

- d. To update Owner's Data;
- e. For the administration and analysis of services;

f. To safe keeping information and attend requirements of any competent authority;

g. To always maintain Personal Data, complete, relevant, and updated, in compliance with quality principles established by applicable laws;

h. To complete KYC formats, defined as "know your customer";

i. To contact the Owner and that the Responsible may provide the requested services;

j. To provide security to the Owner when he/she visits the office of the Responsible and control the sanitary measures that apply;

k. Offer to the Owner services through the electronic mechanisms of the Responsible.

Likewise, there are secondary purposes of this Notice that are not necessary for the existence and fulfillment of the legal relationship between the Owner and the Responsible, however they are complementary because they allow to provide a better service and attention, such as: i) the offering and promotion of the Services; ii) design, development, analysis, advertising and commercial prospecting purposes, promotion of services, organization of events or conferences; iii) analysis and elaboration of opinions, surveys and experience of the Owner complying with quality standards; iv) follow-up to the request of services offered by the Responsible; v) for the attention of doubts, complaints and clarifications, as well as updating databases and statistical information related to the services offered by the Responsible.

If the Owner do not have some of the above mentioned data, it could be possible that the Responsible cannot provide the services of the legal relationship established with the Owner.

5. Data Collection, IP Addresses and Technology Security Protocols

The Responsible applies some technologies to improve the website efficiency and cyber tools.

In this regard, Global will collect the data as follows:

- > When it is directly provided by the Owner;
- When visiting the website;
- > When the information is obtained from other sources authorized by the law;
- ➤ Using web technologies, as:

• Cookies: Is a data sent by a website and stored on the hard disk by the computer browser; for example, the pages you visited, what you downloaded from the site, the domain name of your internet service provider and the country of origin of our visitors, as well as the addresses of the sites they visited immediately before and after visiting the website located on <u>www.globalcs.mx</u>.

However, this information is not individually associated with the user and is only operated in global basis. Most browsers allow people to decline cookies and continue browsing the entire website.

• *Web Beacons*: Also called unique pixels, they 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 the user's IP address, time of interaction within the page and type of browser.

• Camcorders: Offices of Global could operate surveillance cameras that constantly film people. This information will be saved temporarily.

6. Temporality, transmission, and transfer of Data

The handling of Owner's Personal Data will depend on the legal relationship that he/she has with the Responsible, as well as the obligations required by current legislation, the competent authorities and the company's internal policies to maintain the confidentiality of such information.

Accordingly with the law provisions, the Responsible shall give access to the Owner's Personal Data in the following cases:

a. If the transfer is made to persons who have the "Manager" status, such as services providers or Global business-related partners; and that according to that legal relationship they need to know the information, and that they recognize the obligations to maintain strict confidentiality and security complying with the guidelines of this Privacy Notice.

b. When the transfer is made to related parties, subsidiaries, or affiliates under the common control of the Responsible, operating with the same processes.

c. If the prevention or medical or health diagnosis is needed, as well as the provision of similar assistance or services.

d. When the transfer is appropriate under a draft or concluded contract by the Owner or by the Responsible and a third party linked with such Owner.

e. If the referral or transfer is legally required to safeguard the public interest, for the procurement or administration of justice, or requested by any judicial authority or court order. This transfer does not require the express consent in accordance with the provisions of article 37 of the Law.

f. Under any exception specified in article 37 of the Law or any other applicable provision.

Third parties and associated companies that receive Personal Data assume the same obligations and/or responsibilities that Global has, in accordance with this Privacy Notice.

The information collected will not be sold or marketed with third parties.

Regarding Personal Data, the Owner may exercise the rights of access, rectification, cancellation and/or opposition (ARCO Rights in Spanish) or revoke the consent that has been granted for their treatment, by sending an email to <u>globalcs@globalcs.mx</u>, or by contacting us at +52 (55) 25893941.

If the Owner does not express his opposition to the transfer of Personal Data as established in this Privacy Notice, it will be understood that it is consented.

7. Rights of Access, Rectification, Cancellation, Opposition, Revocation and Limitation of Personal Data

ARCO rights (for its acronym) are those that allow the Owner to request access, rectification, revocation, cancellation, or opposition and limit the use or disclosure of his/hers Personal Data.

For exercise ARCO rights, the Owner can send a written request addressed by email to the General Management at <u>globalcs@globalcs.mx</u>; by phone at +52 (55) 25893941; or directly to the address located in Amores No. 1155, Col. Del Valle, Alcaldía Benito Juárez, C.P. 03100, Mexico City.

The written request must at least contain the following:

a. The name of the Owner and the address or other location to communicate the response to the written request;

b. Documents proving the Owner's identity or, where applicable, a legal representation;

c. A clear and precise description of the Personal Data which the Owner is intending to exercise the aforementioned rights;

d. Any other element or document that facilitates the location of the Personal Data and,

e. In case of a rectification, the Owner shall indicate the modifications, providing a support documentation of the request.

In this sense, the Responsible will respond the written requests of the Owner's, as long as it is not applicable any of the exempts contained by the Law, and if it complies with the provisions of article 29 that establishes the rules for such applications.

If appropriate, the Responsible shall inform the positive answer to the Owner during the next twenty working days (counted since the date on which the request to Access, Rectification, Cancellation, or Opposition, was received), in order to make the corresponding processing within the next fifteen working days (counted since the date on which the reply was communicated). If the circumstances of the case are justified, the deadlines may be extended for an equal period.

If the Data Owner feels affected by the resolution issued by the Responsible, or considers that the Personal Data rights have been infringed for a legitimate cause, he/she has the right of protection, complaint or protest in the National Institute for Transparency, Access to Information and Protection of Personal Data ("INAI") and, if appropriate, the Responsible may not keep the Owner's information.

8. Updating the Privacy Notice

At any time, Global reserves the right to make any modifications, corrections, or updates to this Privacy Notice. These modifications will be available to the public immediately upon publication on the website <u>www.globalcs.mx.</u>

Is recommended that the Owner consults the Privacy Notice at least every six months, to be updated of its scope, as well as its terms and conditions.

9. General consent

Presenting to the Owner this Privacy Notice and its modifications, either personally, on the website or other media, and having not immediately expressed opposition, it shall be understood that he has tacitly consented the processing of his/hers Personal Data. If the Owner provided Personal Data orally, in writing, by electronic, optical or any other technology, or by unequivocal signs, it is understood that he/she has given and express consent.

If the interaction is with any other arranged mechanisms, the user authorizes to be contacted in order to provide further promotional information of the services that could be provided by the Responsible; additionally, the user may provide written authorization for this purpose, to be contacted by other available way.

10. Express consent

In accordance with the applicable articles of the Law, its Regulations and the specific guidelines, the Owner accepts:

a. The acknowledgement to having read and understood this Privacy Notice and its scope;

b. The express consent to the processing of Personal Data for the purposes of this Privacy Notice and,

c. That the Responsible may transfer the Personal Data mentioned in this Notice to third parties, regarding the processes indicated herein.

11. Preservation and security of Personal Data

The Responsible will keep Personal Data as long as it is necessary to process the services requests, and to fulfill the legal relationship that may be concluded with the Owner, as well as to maintain records in terms of the Law, its Regulations, and other applicable provisions.

The Personal Data processed by the Responsible will be protected by security measures against damage, loss, alteration, destruction, use, access, or unauthorized processes.

12. Disclaimer

The Responsible's website may contain links, hyperlinks, or hypertexts, banners, buttons, and other internet search tools, which, when used by the Owner, redirect to other websites that could be owned by third parties. The Responsible does not control such sites and is not responsible for their privacy notices or the lack of them.

The Personal Data that the Owner may provide in different websites than <u>www.globalcs.mx</u>, are the sole and exclusive responsibility of the Owner and the owners of said sites.



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