



## CLIENTS INTEGRAL PRIVACY NOTICE

### Identity and Address of the Personal Data Controller.

Under the provisions set forth in the Federal Law for the Protection of Personal Data in Possession of Private Companies or Individuals (*Ley Federal de Protección de Datos Personales en Posesión de los Particulares* "LDP") and other applicable provisions, AN GLOBAL IT, S.A.P.I. DE C.V. (hereinafter referred to as, the "Personal Data Controller"), with address to hear and receive notifications in Bosque de Alisos 45B, Cuajimalpa de Morelos, Bosques de las Lomas, Postal Code 05120, Mexico City, Mexico; hereby informs you expressly:

### Personal data collected and submitted to treatment.

For the development of the purposes described in this Privacy Notice, we collect or may collect the following categories of personal data:

1. Information for identification purposes,
2. Personal characteristics information,
3. Professional and job-related information,
4. Economic, financial and insurance information,
5. Transactions information.

### Treatment of sensitive personal data

For the fulfillment of the purposes indicated in the following section, the Personal Data Controller will not collect sensitive personal data.

### Purpose of the treatment

Original and necessary purposes:

1. Management, control, administration and update of the information related to the clients of the Personal Data Controller, including information related with legal representatives of legal entities, that is necessary to hire our services and document the legal relationship between the parties.
2. Management, control and administration of communications between the Personal Data Controller and its customers.
3. Billing of the services provided by the Personal Data Controller.



4. Management, control and administration of the judicial or extrajudicial collection of the services provided by the Personal Data Controller.
5. Customer service and follow up on complaints and/or clarifications through the communications means established for such purposes by the Personal Data Controller.
6. Sending of communications about offers and new products and/or services provided by the Personal Data Controller.
7. Statistics and historical record of clients and legal representatives of the Personal Data Controller. Additional purposes: Do not exist.

### **Transfers of personal data**

Your personal data may be transferred within the national territory or abroad, to the following categories of receivers and for the purposes identified hereinbelow:

1. Parent companies, subsidiaries or subsidiaries of the Personal Data Controller for purposes of centralized protection of information, control of registrations and cancellations, changes in the scope of hired services, hiring of specialized services provided by another company of our corporate group; as well as for the analysis and statistics on the clients of the Personal Data Controller, in order to evaluate, improve and design new services.
2. Public Organizations; federal, state or municipal public administrations; Commissions; Institutes and/or Regulatory Entities; for the compliance with the fiscal, informative, transparency or compliance obligations contained in judge or administrative requirements issued by competent authorities.



3. Service providers; when it is strictly necessary for them to assist the Personal Data Controller in the execution of the services related to their agreement.

### **Consent for the transfer of data**

The transfers of personal data referred to in subsection 1 through 3 hereinabove do not require your consent to be made, pursuant to the provisions set forth in article 37 of the LFPD.

In all other cases, your personal data will not be transferred to third parties without your consent, excepting for the provisions set forth in article 37 of the LFPD and in in all cases complying with the terms and conditions set forth in article 17 of the Regulation of the LFPD.

### **Exercise of Arco Rights.**

In all those cases that may legally proceed, you will have the right to exercise, at all times, your rights of Access, Rectification, Cancellation and Opposition (ARCO) through the procedures that we have implemented.

The corresponding request must comply with the requirements set forth in the legislation in force, by means of a written request to our Department of Personal Data, to the address indicated in subsection A. The request must contain, and the following shall be attached thereto:

1. Your name and address or any other means to communicate the response to your request



2. Documents proving your identity or, as applicable, the legal representation
  
3. The clear and precise description of the personal data with respect to which you intend to exercise any of the ARCO Rights

Any other element or document that facilitates the location of the personal data

The Personal Data Controller will inform you, within a period no greater than twenty business days as from the date on which the Personal Data Controller received the corresponding request its determination about the determination that has been adopted. If the request is appropriate, it will be effective within the fifteen business days following the date on which the Personal Data Controller communicates its response. In the event that the information provided in your application is incorrect or insufficient, or the documents necessary to prove your identity or the corresponding legal representation were not provided, the Personal Data Controller, within the five business days after the date on which the Personal Data Controller received your request, will require the correction of the deficiencies in order to be able to file and process it. In these cases, you will have a term of ten business days to meet the correction request, counted as from the next day on which you received such request. The corresponding request will be deemed as not filed if you do not respond within the foregoing period.

Alternatively, you may send your request through the address [datospersonales-mx@anglobal.com](mailto:datospersonales-mx@anglobal.com), but complying with all the requirements set forth above, including as Subject of the communication "ARCO Rights and/or Revocation of consent". The terms of the procedure will be the same terms as those set forth in this section. The use of electronic means for the exercise of ARCO rights authorizes the Personal Data Controller to respond to the corresponding request through the same means, unless the title holder clearly and expressly indicates another means.

You can obtain the information or personal data requested through simple copies, electronic documents in conventional formats (Word, PDF, etc.), or through any other legitimate means that guarantees and proved the effective exercise of the requested right.



You will be responsible to keep updated your personal data possessed by the Personal Data Controller. Therefore, you hereby guarantee and respond, in any case, the veracity, accuracy, validity and authenticity of the personal data provided, and you hereby undertake to keep such data updated, communicating any changes to the Personal Data Controller.

### **Revocation of consent**

You will be able to revoke your consent to the processing of your personal data, without retroactive effect, in all cases in which such revocation does not imply the impossibility of complying with obligations arising from a legal relationship between you and the Personal Data Controller.

The procedure for the revocation of consent, as the case may be, will be the same as the procedure set forth in the above section with respect to the exercise of ARCO rights.

### **Limitations on the use and disclosure of your personal data**

If you will to limit the use or disclosure of your personal data, you may communicate it to the Personal Data Controller at the time on which you provide your information, or any time thereafter by directing the corresponding request to our Personal Data Department. The requirements to prove your identity, as well as the procedure to process your request will be the same as the procedure set forth for the exercise of ARCO rights.

The Personal Data Controller has the proper means and procedures to ensure the inclusion of some your data in the exclusion lists, prior to an express request for their inclusion. The Personal Data Controller will grant the tittle holders who request such registration with the corresponding registration certificate.

### **Modifications or updates to this Integral Privacy Notice**

The Personal Data Controller may amend, update, extend or otherwise modify the content and scope of this Privacy Notice, at any time and at its full discretion. In such cases, we will post such modifications on the website [www.anglobal.com](http://www.anglobal.com), Section "Privacy Notices".



Any amendment to this Privacy Notice may also be communicated via email, when such means have been set forth as a communication channel between you and the Personal Data Controller, during the validity of a legal relationship.

Date for last update:

May 16, 2018