

PRIVACY NOTICE

This document constitutes the 'Privacy Notice' of **TROPHE INGREDIENTES, S.A. DE C.V.**, and its affiliates and subsidiaries (hereinafter '**TROPHE**'), where it establishes how your information will be treated by **TROPHE**, as well as the purpose for which it was collected, in accordance with articles 15 and 16 of the Federal Law on Protection of Personal Data Held by Private Parties (the '**Law**').

TROPHE respects your right to privacy and protection of personal data, sensitive personal data, including your financial or asset data, which are protected under the **Law**. The database containing your information is the responsibility of **TROPHE**, which is located at Avenida de la Industria Electrónica number 107 (One hundred seven), Parque Industrial Escobedo, in the municipality of General Escobedo, Nuevo León, Zip Code 66062. Likewise, your information is duly safeguarded in accordance with the administrative, technical, and physical security provisions established in the relevant law to protect it from possible damage, loss, alteration, or unauthorized access.

I. DEFINITIONS:

For the purposes of this Notice and in accordance with the Law, the following shall be understood as:

- Privacy Notice: Physical and/or electronic document generated by **TROPHE** that is made available to the Data Subject, prior to the processing of their personal data.
- Personal Data: Any information concerning an identified or identifiable natural person.
- Sensitive Personal Data: Personal data that affects the most intimate sphere of its owner or whose improper use could give rise to discrimination or entail a serious risk for them.
- ARCO Rights: Refers to the rights of Access, Rectification, Cancellation, and Opposition that, in accordance with the provisions of the **Law** and subject to the exceptions established therein and in this Privacy Notice, each Data Subject has in relation to the Personal Data collected by **TROPHE** and/or its processors, as described below:
 - Right of Access: It is the right of the Data Subject to know about the Personal Data related to their person that are held by **TROPHE** or its processors, as well as to whom they have been shared and for what purpose.
 - Right to Rectification: Each Data Subject has the right to have their Personal Data rectified when they are inaccurate or incomplete.
 - Right of Cancellation: Each Data Subject has the right to request at any time the deletion of their Personal Data, which will occur once the blocking period has elapsed. Blocking implies the identification and preservation of the Personal Data, once the purpose for which they were collected has been fulfilled, and its purpose is to determine possible

responsibilities in relation to their processing, until the legal or contractual prescription period expires. During this period, the Data Subject's Personal Data will not be subject to processing, and once it has elapsed, their cancellation will proceed in the corresponding database or file. Once the corresponding data is canceled, **TROPHE** will notify the Data Subject accordingly. In the event that the Personal Data had been transmitted prior to the date of rectification or cancellation and are still being processed by third parties, **TROPHE** will inform said third party of said request for rectification or cancellation, so that they also proceed to carry it out.

- Right of Opposition: The Data Subject has the right at all times to request, provided they have a legitimate reason, that **TROPHE** stop processing their Personal Data.

- Processor: Means the natural or legal person who, alone or jointly with others, processes Personal Data on behalf of **TROPHE**.

- Data Subject: Means the natural person who is the owner of the Personal Data, or authorized to provide Personal Data of a third party in accordance with applicable laws, who provides such Personal Data to **TROPHE**.

- **TROPHE**: Means the natural or legal person who decides on the processing of the Data Subject's Personal Data, in this case, Grupo Trophe, S.A. de C.V. and its other subsidiaries and affiliates.

II. CONSENT OF THE DATA SUBJECT:

In order to comply with the provisions of Article 17 of the Law, the Information Holder acknowledges and accepts that:

I. This Privacy Notice has been made known to them by **TROPHE**.

II. Having read, understood, and agreed to the terms set forth in this Privacy Notice, therefore, they consent to the processing of their Personal Data for the purposes of the **Law** and other applicable legislation. Likewise, the Data Subject states that in the event that this Privacy Notice is available through an electronic means (website, Internet page, applications, or similar) or any other electronic device, by clicking "accept" or by any other means of continuing to browse the site, or by providing their Data through it or through any electronic means (email, etc.), the provision of Personal Data through dialog boxes, or the viewing and scrolling of terms and conditions, constitutes an expression of their consent for **TROPHE** to process their Data, in accordance with this Privacy Notice. Similarly, it is stated that in the event that this Privacy Notice is available in writing, their signature, rubric, name, or fingerprint, or the provision of their Data, constitutes an expression of their consent for **TROPHE** to process their Data, in accordance with this Privacy Notice.

III. The Information Holder gives their consent for **TROPHE** and/or any of its subsidiaries and/or affiliates to transfer their personal data to third parties, national or foreign, understanding that the processing of such Personal Data by said third parties must comply with the provisions of

this Privacy Notice. In the event that the Data Subject does not oppose the terms of this Privacy Notice within the next 48 hours after it has been made available to them, its content will be considered agreed upon and consented to, in terms of the third paragraph of Article 8 of the Law. The consent of the Data Subject may be revoked at any time by them without retroactive effects, in the terms and according to the procedures established below in this Privacy Notice. Additionally, and in accordance with the provisions of Articles 10, 37, and other related articles of the Law and its Regulation, the Data Subject acknowledges that their consent will not be required for the processing of Personal Data by **TROPHE** or third parties when:

- a. It is provided for by Law;
- b. The data are contained in sources of public access;
- c. The personal data are subject to a prior dissociation process;
- d. It is necessary to comply with obligations derived from a legal relationship between the Data Subject and TROPHE;
- e. There is an emergency situation that potentially could harm an individual in their person or property;
- f. They are necessary for medical care, prevention, diagnosis, provision of health care, medical treatments, or management of health services;
- g. A resolution of a competent authority is issued;
- h. The transfer is necessary for the recognition, exercise, or defense of a right in a judicial proceeding; and
- i. The transfer is necessary for the maintenance or fulfillment of a legal relationship between TROPHE and the Data Subject.

III. PURPOSE OF THE PRIVACY NOTICE/PURPOSE OF PERSONAL DATA:

The purpose of this Privacy Notice is to establish the terms and conditions under which **TROPHE**:

- I. Will receive and protect the Personal Data of the Data Subject, in order to safeguard their privacy and their right to informational self-determination, in compliance with the provisions of the Law;
- II. Will use the Personal Data of the Data Subject; and
- III. Will, if applicable, carry out the transfer of Personal Data to third parties.

TROPHE will collect and process the Personal Data of the Data Subject, meaning the information that can reasonably identify them, through the reception of documents, whether in printed and/or digital format. The following are examples, illustrative but not limited to, of information that TROPHE may collect: name and surname; address, whether private, work, or fiscal; email address,

personal or work-related; telephone number, private or work-related; cell phone number; Taxpayer Identification Number (TX ID).

The collection of Personal Data may be carried out through direct delivery to **TROPHE** or through the use of emails and/or through the utilization of its websites, by voluntarily providing information through the dialogue windows enabled on the sites, or by using automatic data capture tools. These tools allow them to collect information sent by your browser to said websites, such as the type of browser you use, the user's language, access times, and the IP address of websites you used to access **TROPHE** or Processors' sites. TROPHE may also collect Personal Data from publicly available sources and other sources available in the market to which the Data Subject may have consented to share their personal information or provided anonymous demographic information associated with a specific geographic area.

This information may be used by **TROPHE** for any of the following purposes:

I. Commercial Purpose: Name of the Information Holder, address, RFC (Taxpayer Identification Number), telephone number, billing account number, date of birth, banking information. This information may be used, illustratively but not limited to, for:

- a. Offering products and services, whether in physical, telephonic, electronic, or any other technology or means available to **TROPHE**.
- b. Informing about new products or services that may be of interest in relation to the contracted service.
- c. Making automatic billing charges for your convenience.
- d. Issuing purchase orders or work requests, as applicable; and/or
- e. Any other action necessary to fulfill **TROPHE** interests regarding the agreement reached with the Information Holder.

II. Employment Purpose: In relation to job offers or job applications through the submission of resumes, information such as name, address, contact phone number, email address, level of education, personal references, work experience, TAX ID (Taxpayer Identification Number), social security number (SSN) and official identification may be requested. This information may be used, illustratively but not limited to, for:

- a. Evaluation as a potential candidate for a vacant position.
- b. If applicable, the preparation of the Service Provision Contract and/or Individual Employment Contract.
- c. Providing references if requested by another person or company regarding candidates.

III. Purpose of Security in Access to Facilities: This information may be used, illustratively but not limited to, for:

- a. Supporting, recording, and/or controlling the registration of individuals who access or visit TROPHE's facilities.
- b. Complying with the security guidelines established in **TROPHE** internal policies. In relation to the information requested for access to **TROPHE** facilities, information such as full name, signature, official identification, as well as information about electronic equipment to be brought into TROPHE's facilities may be requested.

IV. SAFEGUARD AND SECURITY OF PERSONAL DATA:

TROPHE and/or its delegates will retain the Personal Data of the Data Subject for as long as necessary to process their requests for information, products, and/or services, as well as to maintain accounting, financial, and auditing records in accordance with the Law and current commercial, fiscal, and administrative legislation. The Personal Data of the Data Subject collected by TROPHE and/or its delegates will be protected by appropriate administrative, technical, and physical security measures against damage, loss, alteration, destruction, or unauthorized use, access, or processing, in accordance with the provisions of the Law and the administrative regulation derived therefrom. However, TROPHE does not guarantee that unauthorized third parties cannot access the physical or logical systems of the Data Subjects or of TROPHE or the electronic documents and files stored in its systems. Therefore, TROPHE, its affiliates, and subsidiaries shall not be liable in any case for damages that may arise from such unauthorized access.

V. PROCEDURE TO EXERCISE ARCO RIGHTS:

To exercise the ARCO Rights, the Data Subject or their representative must submit a request for access, rectification, cancellation, or opposition with the following information and documentation:

- a. Name of the Data Subject and address or another means to communicate the response to their request;
- b. Documents proving their identity (simple copy in printed or electronic format of their voter ID card, passport, or FM-2 or FM-3) or, if applicable, the legal representation of the Data Subject (simple copy in printed or electronic format of the simple power of attorney with the autograph signature of the Data Subject, the representative, and their corresponding official identifications - voter ID card, passport, FM-2 or FM-3);
- c. A clear and precise description of the Personal Data for which they seek to exercise any of the ARCO Rights, and d. Any other element or document that facilitates the location of the Data Subject's Personal Data.

In the case of requests for rectification of Personal Data, the respective Data Subject must also indicate the modifications to be made and provide the documentation supporting their request. For the reception, registration, and handling of requests to exercise your right of access, rectification, cancellation, and opposition to your Personal Data, as well as to limit the use or disclosure of your data, and other rights provided by **Law**, please contact: Email address: info@trophe.mx **TROPHE** or its processors will respond to the respective Data Subject within a maximum period of 20 (twenty) business days, counted from the date the request for access, rectification, cancellation, or opposition was received, with the determination adopted, so that, if applicable, it can be implemented within 15 (fifteen) days following the date the response is communicated to the Data Subject. In the case of requests for access to Personal Data, **TROPHE** or its processors will proceed with their delivery after accrediting the identity of the requester or their legal representative, as applicable. The aforementioned deadlines may be extended only in terms of the **Law**. The delivery of Personal Data will be free of charge; the Data Subject will only be responsible for covering the justified shipping expenses or the cost of reproduction in copies or other formats. In the event that the Data Subject reiterates their request within a period of less than 12 (twelve) months, they must cover the corresponding costs equivalent to 1.5 (One point five) days of the Minimum Wage in force in the Federal District in terms of the **Law**, unless there are substantial modifications to the Privacy Notice that warrant new consultations. For the purposes of requests for the cancellation of Personal Data, in addition to what is provided in this Privacy Notice, the provisions of Article 26 of the Law shall apply, including the cases of exceptions to the cancellation of Personal Data indicated therein. The submission of a request for opposition to the use of Personal Data by the Data Subject will grant **TROPHE** the authority to oppose the use of the Personal Data that the Data Subject has provided to the opponent.

VI. MODIFICACIONES:

In the event that any modification to the provisions of this Privacy Notice is required, **TROPHE** undertakes to inform you of the changes that may be required, by any means, including electronic means, with prior notice given to you so that you may express your opinion, as you see fit. If no express written objection is received from you, or if there is no response at all, it will be understood that you accept the changes made.

VI. NOTIFICATIONS REGARDING CHANGES TO THE PRIVACY NOTICE:

If **TROPHE** changes this privacy notice, such changes will be posted on the website www.trophe.mx. If you have any questions, comments, require additional information about our Privacy Notice, or wish to exercise any rights related to it, please contact our Department of Personal Data: info@trophe.mx. For the purposes of the provisions of section I of Article 16 of the **Law**, **TROPHE** address is as stated in the second paragraph of this Privacy Notice.



This privacy notice has been created based on the rules issued by the Federal **Law** on Protection of Personal Data in México Held by Private Parties pursuant to Articles 16, 17, and 36 of the Law and corresponding provisions of its Regulations in México.

