



aklara Privacy Notice for Customers and Users

This privacy notice is established in compliance with the provisions of the Federal Law for the Protection of Personal Data in Possession of Individuals (*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*) (the "**Personal Data Law**").

All terms used with initial capital letters not defined in this Privacy Notice shall have the meaning ascribed to them in the **Personal Data Law**.

- I. **Identity and address of the Controller.** The Controller is Regional Market Makers de México, S. de R.L. de C.V. ("**aklara**"), with address at Monte Cáucaso 915, Despacho 203, Lomas de Chapultepec I Section, Miguel Hidalgo, Mexico City, 11000.
- II. **Personal Data collected.** To carry out the Purposes described in this Privacy Notice, **aklara** collects the following Personal Data from its prospects, customers and/or users (hereinafter, the "**Data Owners**") who have or intend to have access to the digital platforms owned by **aklara** (hereinafter, the "**Platforms**") and, where applicable, to be able to obtain services related to the use of the **Platforms** or any other service offered by **aklara** (hereinafter, the "**Services**"):
 - i) Identification Data.
 - ii) Contact Information.
 - iii) Asset Information.

In addition, **aklara** may collect, through the **Data Owners**, the following Personal Data from the representatives, officials, joint and several obligors, guarantors, accommodation endorsers, partners, shareholders, beneficial owners and/or any other legal figure of said **Data Owners**, and which is essential in order to use the **Platforms** and, where applicable, to provide the related **Services** (hereinafter, the "**Additional Data Owners**"):

- i) Identification Data.
- ii) Contact Information.
- iii) Employment Data.
- iv) Asset Information.

The **Data Owners** acknowledge that they can provide **aklara** Personal Data of the **Additional Data Owners**, to whom are obliged to inform about the Processing given to their Personal Data so that the **Data Owners** can use the **Platforms** and, where appropriate, engage the **Services**. Therefore, the **Data Owners** must inform the **Additional Data Owners** about the content of this Privacy Notice.

It is important to mention that the data mentioned in this section are categories of Personal Data; If you need to know each of the Personal Data that is collected, please contact **aklara** through the means indicated in this Privacy Notice

- III. **Sensitive Personal Data collected.** **aklara** does not collect Sensitive Personal Data from the **Data Owners** or the **Additional Data Owners**.
- IV. **Purposes of Personal Data Processing.** The purposes for which **aklara** collects Personal Data from the **Data Owners** and/or **Additional Data Owners**, which are necessary so that the **Data Owners** can use the **Platforms** and, where appropriate, be able to engage the **Services**, are the following:
 1. Identify the **Data Owners** and **Additional Data Owners**, verify and validate their identity and the veracity of the information provided in order to use the **Platforms** and engaging the **Services**.
 2. Integrate files and Databases essential to carry out operations related to the use of the **Platforms**.
 3. Carry out the investigations and actions that are considered necessary to evaluate the possibility of providing the **Services** and, where appropriate, provide the corresponding quotes.

4. Carry out the registration and signing in of customers and/or users on the **Platforms**.
 5. Contact the **Data Owners** and/or **Additional Data Owners**, as well as rectify or update their information.
 6. Correctly provide the corresponding **Services**, in terms of the provisions of the documents signed or accepted by the **Data Owners** and/or **Additional Data Owners** to use the **Platforms** and other necessary and applicable systems.
 7. Know and validate the financial conditions of the **Data Owners** and, where applicable, of the **Additional Data Owners**.
 8. The contracting of insurance that, if applicable, is required in accordance with the documents signed for engaging the **Services**.
 9. Incorporate the information of the **Data Owners** and **Additional Data Owners** into the Databases, in order to provide them with the corresponding customer service.
 10. Carry out the necessary judicial and/or extrajudicial collection procedures, related to the engaged **Services**.
 11. Bill, collect and process payments that, if applicable, are due for the provision of the engaged **Services**.
 12. Prevent and detect fraud or other crimes.
 13. Comply with the applicable laws, regulations and legal provisions, as well as the internal policies of **aklara** and the contracts, agreements or negotiations entered into between **aklara** and the **Data Owners**.
- V. **Additional or Secondary Purposes.** The Purposes that do not give rise to and are not necessary to carry out and maintain the legal relationship between **aklara** and the Data Owners, known as secondary or accessory, are the following:
1. Offer, where appropriate, other products or services of its own or of any of its controlling companies, subsidiaries or affiliates, or to a parent company or to any company under the common control of the controller or its main shareholder or any other of the same **aklara** group. that operates under the same internal processes and policies, as provided for by the respective legislation, as well as those associated and commission agents.
 2. Perform statistical analysis, generate information models and/or profiles of current and predictive behavior.
 3. Evaluate the quality of the **Services**.
 4. Share the necessary or useful information, notices and news regarding the **Services**.
 5. Carry out commercial intelligence, carry out market research, give visibility to the activity of the **Data Owners** on the **Platforms**, monitor the quality of the **Platforms**, evaluate and improve the **Platforms** and send our newsletter.
- VI. **Mechanisms so that the Data Owners can express their refusal for secondary or accessory purposes.** The **Data Owners** will have the option, each time they receive our newsletter and offers, to unsubscribe from it following the process established at the bottom of the email through which such material is sent.

At any time, the **Data Owners** may express their refusal to process their Personal Data for those purposes that are not essential for the fulfillment of the legal relationship with **aklara**, through the mechanism provided for in section VIII of this Privacy Notice, on the understanding that, if **aklara** does not receive the corresponding **ARCO Request**, the use of your Personal Data for the aforementioned purposes will be understood and will be considered authorized.

VII. Transfers of Personal Data. **aklara** may carry out the national or international transfer of the Personal Data of the **Data Owners** and, where applicable, of the **Additional Data Owners** without their authorization, in accordance with article 37 of the Personal Data Law, in the following cases:

1. To other customers and/or users of the **Platforms** to provide commercial references and establish negotiations with the **Data Owners**. The above, derived from an agreement entered into by **aklara** with customers and/or users in the interest of the **Data Owners**.
2. To other customers and/or users of the **Platforms** so that they can integrate a know your customer file of the client, in accordance with the applicable regulations and policies. The above, so that they can comply with the obligations established in the contracts or agreements entered into between **aklara** and the **Data Owners** executed to use the **Platforms** and provide the **Services**.
3. To other customers and/or users of the **Platforms** so that they can comply with the obligations established in the contracts or agreements entered into between **aklara** and the **Data Owners** executed to use the **Platforms** and provide the **Services**.
4. To insurers or insurance agents in order to engage insurances that are applicable the provide the **Services**.
5. To the Mexican Postal Service, to send the corresponding information in accordance with the contracts or agreements entered into between **aklara** and the **Data Owners**.
6. To the National Electoral Institute; to verify and validate the authenticity of the data and documents provided by the **Data Owners** regarding their identity or the identity of the **Additional Data Owners**.
7. To the assignees of **aklara's** rights under the contracts entered into between **aklara** and the **Data Owners**.
8. To the subsidiaries, affiliates or controllers of **aklara**, to report, operate or manage the **Services**.
9. To the companies that celebrate or intend to celebrate a merger or demerger with **aklara**.
10. To the competent authorities, if requested, in terms of the applicable regulation.
11. In any other case established in the **Personal Data Law** or applicable regulation that does not require the consent of the **Data Owners** and, where applicable, the **Additional Data Owners**.

aklara does not make transfers that require authorization from the **Data Owners** or, where applicable, the **Additional Data Owners**.

The third parties receiving the Personal Data of the **Data Owners** and, where applicable, of the **Additional Data Owners**, transferred in accordance with this section, know the content of this Privacy Notice and the purposes for which the Personal Data that, If applicable, are transferred to them, so they are obliged to process the Personal Data to which they have access in accordance with this document and the **Personal Data Law** and/or any other Personal Data protection regulation that is applicable to them.

VIII. Means to exercise ARCO Rights. To exercise the rights of access, rectification, cancellation or opposition ("**ARCO Rights**"), in accordance with the provisions of the **Personal Data Law**, the **Data Owners** and, where applicable, the **Additional Data Owners** may submit the corresponding request in writing to **aklara**, at the following email address datospersonales@aklara.com or directly at **aklara's** address, indicated in section I above. The request for access, rectification, cancellation or opposition ("**ARCO Request**") must contain the following information and documentation:

1. The name of the **Data Owner** or **Additional Data Owner** and, where applicable, their legal representative and the address or other physical or electronic means to communicate the response to their request.

2. Documents that prove the identity or, where applicable, the legal representation of the **Data Owner** or **Additional Data Owner** and must provide a valid official identification of the **Data Owner** or **Additional Data Owner** and, where applicable, of their representative, as well as evidence of the applicable representation.
3. The clear and precise description of the Personal Data with respect to which you seek to exercise any of the **ARCO Rights**, as well as the indication of the right or rights that you wish to exercise in terms of the **ARCO Request**.
4. Any other element or document that facilitates the location of Personal Data, such as the identification of the contract, user or Service that relates the **Data Owner** or **Additional Data Owner** with **aklara**.
5. In the case of requests for rectification of Personal Data, the **Data Owner** must indicate, in addition to what is indicated in this section, the modifications to be made and provide the documentation that supports their request.

aklara will communicate to the **Data Owner** or **Additional Data Owner**, within a maximum period of twenty days, counted from the date on which the **ARCO Request** was received, the determination adopted, so that, if appropriate, it becomes effective within fifteen days following the date on which the response is communicated. The response will be granted by the means specified in the **ARCO Request**.

In the event that the information provided in the **ARCO Request** is erroneous or insufficient, or the corresponding accreditation documents are not accompanied, within five (5) business days following receipt of the request, **aklara** may require that the **Data Owner** or **Additional Data Owner** provides the necessary elements or documents to process it. The **Data Owner** or **Additional Data Owner** will have ten (10) business days to respond to the request, counting from the following day of its receipt. If no response is given within said period, the corresponding request will be considered not submitted.

The aforementioned deadlines may be extended only once for an equal period, as long as the circumstances of the case justify it. If the **ARCO Request** is appropriate, the delivery of Personal Data will be free of charge through the email address that the **Data Owner** or **Additional Data Owner** indicates for such purposes, as long as it is technically possible for the purposes of adequate compliance with the **ARCO Request**. If the **Data Owner** or **Additional Data Owner** requests or due to specific circumstances, it is necessary for the information to be delivered in a different way, the **Data Owner** or **Additional Data Owner** must only cover the shipping costs and/or the cost of reproduction in copies or other formats.

aklara may deny access to Personal Data or make rectification or cancellation or grant opposition to the Processing thereof, in the cases established in the **Personal Data Law**.

The **aklara** Compliance Department is the department formally designated to supervise and respond to requests for the exercise of **ARCO Rights** and promote the protection of Personal Data within the organization. If the **Data Owner** or **Additional Data Owner** wishes to contact the **aklara** Compliance Department, they may do so through the means previously referred to in this section.

- IX. Mechanism to revoke consent.** If you wish to revoke your consent regarding the Processing of your Personal Data at any time, you must follow, as appropriate, the procedure established in section VIII of this Privacy Notice. Once the above has been done, we will exclude your data from our systems within a term no longer than twenty days after receiving the corresponding request.

It should be noted that the revocation of Consent will not have retroactive effects and that Consent cannot be revoked when: (i) the Processing has the purpose of fulfilling obligations derived from a legal relationship between the **Data Owner** and **aklara**; (ii) when such Processing is established by law; or (iii) when any of the cases of exception to the consent provided in the **Personal Data Law** are met.

- X. Options and means that the Controller offers the Data Owners to limit the use or disclosure of Personal Data.** In order for the **Data Owners** or **Additional Data Owners** to limit the use and disclosure of their Personal Data, they may register in the Public Registry to Avoid Advertising, which is in charge of the Federal Consumer Protection Office (PROFECO), with the purpose that their Personal Data is not used to receive advertising or promotions from companies of goods or services. For more information about this registry, **Data Owners** or **Additional Data Owners** can consult the PROFECO website or contact it directly.

XI. Use of cookies, web beacons or similar mechanisms. The Internet portal www.aklara.com (hereinafter, the “**Portal**”) and the **Platforms** use cookies; cookies are data files that are stored on your hard drive when browsing the **Portal** and that allow the exchange of information on the status of the **Portal** and the **Data Owner's** browser. If you wish to know more information about the cookies used by **aklara's** Internet Portal and Platforms, please go to the [Cookies Policy](#).

XII. Procedure and means by which aklara will inform the Data Owners of the changes to the Privacy Notice. **aklara** reserves the right to make modifications and/or updates to this Privacy Notice. Any changes to this Privacy Notice will be published on the following Internet page: www.aklara.com.

If you wish, you can request the latest version of this Privacy Notice through our Compliance Department, at datospersonales@aklara.com

XIII. Consent. It will be understood that by using the **Portal** and/or the **Platforms** and/or requesting and/or engaging the **Services** for the purposes provided herein, the **Data Owner** acknowledges and accepts that he has read, understood and accepts the terms of this Privacy Notice, therefore such consent grants **aklara** the power to proceed with the Processing of Personal Data in the manner indicated in this Privacy Notice.

Likewise, the **Data Owners** will grant their express consent to this Privacy Notice, through the Portal and/or the **Platforms**.

If you are the **Data Owner** or **Additional Data Owner** of Personal Data collected by **aklara** and wish to obtain more information about this Privacy Notice and the compliance policies of the **Personal Data Law** that **aklara** has adopted, please send a letter to the **aklara** Compliance Department to the email address provided in section VIII above or to the **aklara** address indicated in section I above.

Last update: January 30th, 2024.