

**GRUPO COPPEL
INTEGRITY PROGRAM**

**GRUPO COPPEL'S
PERSONAL DATA
PROTECTION
POLICY**

GRUPO COPPEL'S PERSONAL DATA PROTECTION POLICY

The purpose of this policy is to define the guidelines to be followed for the management, protection and privacy of personal data provided in Grupo Coppel's processes. This policy is applicable to all its Shareholders, Board Members, Directors, Employees and third parties involved in any phase of the processing of personal data.

THE PERSONAL DATA POLICY INCLUDES:



PRIVACY NOTICE

It is a document used by the company to inform the owner about the use of the requested data, specifying the way in which he/she can exercise the ARCO rights.



ARCO RIGHTS AND REVOCATION OF CONSENT

The ARCO rights (**Access, Rectification, Cancellation and Opposition**) are:

- **Access** – You have the right to know what personal information we have on record, how is being used and the terms of use we apply;
- **Rectification** – You can request the correction of your personal information in case it is outdated, inaccurate or incomplete;
- **Cancellation** – You can request to delete your personal information when you consider that it is not being used in accordance with the principles, responsibilities and obligations provided by law;
- **Opposition** - You can oppose the use of your personal data for specific purposes.

The National Compliance Management will be responsible for the attention and follow-up of the ARCO Rights requests.



CONSENT

Personal data can only be used when the holder has previously expressed its consent to be processed.



SECURITY OF PERSONAL DATA

The departments that process personal data must maintain and update an inventory in accordance with current regulations.



RESPONSIBILITIES

The National Compliance Management is responsible for:

- Keeping this policy updated.
- Preparing, reviewing and proposing privacy notices applicable to Grupo Coppel companies.
- Designate or appoint the person responsible for the compliance of the ARCO rights of Grupo Coppel.
- To answer upon requests for the exercise of ARCO rights of Grupo Coppel in accordance with the provisions of the Federal Law for the Protection of Personal Data in Possession of Individuals.
- Train and raise awareness among employees to adhere to the guidelines established in this document.

The Information Security Compliance department is responsible for:

- Reviewing adherence to this policy.
- Auditing the logical, administrative and physical regulations necessary to protect the personal data information with which the company works, both internally and with suppliers or service providers.

This policy is part of Grupo Coppel's Integrity Program; therefore, shareholders, directors, employees and suppliers of Grupo Coppel must report in good faith any conduct contrary to this policy through the available means.

No retaliation of any kind is permitted against those who report. Intimidating or persuading to avoid a report is a conduct contrary to the Code of Ethics, and will be treated as such.