

# **Privacy Policy**

## 1. Responsibility.

You are hereby informed that Operadora Arozarena, S.A. de C.V. (hereinafter "Turicard") with address established at Isabel la Católica 61-A, Colonia Centro, C.P. 06600 Mexico City, will be responsible for the use and protection of personal data that we collect from you (hereinafter the "User"), and will treat them in accordance with the Federal Law on Protection of Personal Data Held by Individuals (hereinafter the "Law"), its Regulations and other applicable regulations, under the terms of this Privacy Notice.

Turicard has mechanisms to ensure the confidentiality of the personal data that is provided to them, even the sensitive ones, leaving these protected, by means of administrative, technical and physical security, to avoid their damage, loss, alteration, destruction, use, access or disclosure. improper.

Only authorized persons will have access to said data for the exclusive purpose of the services provided and Turicard's own activities.

### 2. Personal data subject to treatment.

The personal data that is collected may be the following: full name, address, contact telephone number, email, postal code, place and date of birth, age.

In accordance with the provisions of the Law, you are informed that the personal data and/or sensitive personal data collected from the User will be used for the following purposes that are necessary for the service and/or product requested:

- (i) The sale of the services that Turicard can carry out in accordance with the applicable legislation.
- (ii) The conservation of records for the provision of services in the future and in general to follow up on any contractual relationship.
- (iii) To know your degree of satisfaction to improve your experience in your next purchase of services.

Additionally, your personal information will be used for the following purposes that are not necessary and are considered secondary to the requested service, but that allow and facilitate providing you with a better service:





- (a) Carrying out quality, service or any other type of survey related to the services provided and events held by Turicard.
- (b) The promotion of services, additional benefits, discounts, or promotions, offered by Turicard or related to the same or national or foreign third parties with whom Turicard maintains commercial alliances.
- (c) Any complementary or auxiliary activity necessary to carry out the above purposes.

In the event that the User does not want their personal data to be processed or transferred for these additional purposes, they may express it immediately when acquiring our services, otherwise it will be understood that they accept the use of data for these purposes, additionally they may at any time request their right of opposition for these purposes through the procedures indicated in the section "Rights of the Holders". The refusal to use personal data for these additional purposes may not be a reason to deny the products and/or services requested and/or contracted by the User with the person in charge.

#### 3. Data Transfer.

The owner accepts that their data may be transferred with the understanding that those responsible will communicate this privacy notice and the purposes to which the owner subjected their treatment when dealing with third parties other than the person in charge and that the third party will assume the same obligations that correspond to the person in charge who transferred the data, so that the treatment of the data will be done in accordance with what is agreed in this privacy notice:

Data transfers may be carried out without the consent of the owner if they are necessary by virtue of the acquisition of any service requested and of interest to the owner or for the conclusion of an agreement in the interest of the owner, by Turicard and a third party when required to the maintenance or fulfillment of a commercial or legal relationship, between the person in charge and the owner.

Turicard only makes data remissions to comply with the obligations contracted with customers, employees, suppliers, and any other person with whom it maintains or has maintained a commercial, labor, patrimonial or business relationship and will only share data when required by court order to comply with procedural provisions.





### 4. Cookies and Web Beacons.

In order to improve the User's experience on its website, it is reported that the Website may use "cookies" and "web beacons" or other technologies through which it is possible to monitor the behavior of Internet users. For the purposes of this Privacy Notice, "cookies" will be identified as the text files of information that a website transfers to the hard drive of the user's computer in order to store certain records and preferences. On the other hand, the "web beacons" are images inserted in an Internet page or email that can be used to monitor behavior, the Website only collects information about the IP address and the time of interaction on the website.

These cookies and other technologies can be disabled. To find out how to do it, the User must consult the tools of his Internet browser.

## 5. Facebook and Instagram.

Turicard on Facebook and Instagram respects your privacy and the use of this application is subject to this Privacy Policy. The use of Facebook and Instagram in general and your relationship with Facebook and Instagram are subject to Facebook and Instagram's own privacy policy and other terms and policies that Turicard does not control. This privacy policy describes that Turicard can use the information we obtain with this application on Facebook and Instagram and with whom we can share it

The personal information we collect:

- 1. Information we receive from Facebook and Instagram. The information and content we receive from Facebook and Instagram is provided by the User or other users of Facebook and Instagram or was associated by Facebook with a particular user.
- 2. Independent Information. Information and content that is provided directly to us through a form in this application.

We will protect the information we receive from Facebook and Instagram from unauthorized access, use or disclosure.

The cache collected from Facebook and Instagram will be used to improve the user experience and for future updates.

User data obtained from Facebook and Instagram cannot be transferred to a data intermediary or sold.





### 6. Sensitive data.

In the event that sensitive data is requested, the owner must grant their express written consent for their treatment, through their handwritten signature or electronic signature.

For this purpose, sensitive data is considered to be those personal data that affect the most intimate sphere of the owner, or whose improper use may give rise to discrimination or entail a serious risk for the latter. In particular, those that may reveal aspects such as racial or ethnic origin, present and future state of health, genetic information, religious, philosophical and moral beliefs, union affiliation, political opinions, sexual preference are considered sensitive.

The sensitive personal data that the User provides will be treated and protected with a high standard of security and strict confidentiality and will be used only for the purposes of the legal relationship in full compliance with the provisions of this privacy notice.

# 7. Rights of the holders – ARCO.

The holders may exercise their rights of ACCESS to the personal data held by the person in charge; RECTIFICATION of any personal data that is inaccurate or incomplete; CANCELLATION of any of your personal data if it is not provided for in any legislation as mandatory or OPPOSITION to the processing of your personal data for legitimate reasons.

The owner may also at any time choose to limit the use or disclosure of their personal data, express their refusal to process and transfer their personal data for those purposes that are not necessary, nor have they given rise to the legal relationship with the person in charge. , or revoke your consent to the processing of your personal data; for which he must request it at any time through the same means, after having given his express consent with this notice.

Likewise, the owner may request clarifications by the same means when he has doubts or presumption that his personal data has been transferred for purposes other than those indicated in this Privacy Notice, provided that the case is not considered in the regulation applicable to the company. corresponding.





The request to exercise any of these rights can be made by contacting Turicard through the privacy line:

From Mexico City: tel: +525579699408

Email: datospersonales@turicard.com

With office hours from Monday to Friday from 9 am to 6 pm, except holidays.

To carry out the requests to exercise any of the aforementioned rights, the following requirements will be necessary:

- Indicate the right you wish to exercise.
- Name of the owner and address or other means to communicate your request;
- Documents that prove the identity or, where appropriate, the legal representation of the owner;
- Clear and precise description of the personal data with respect to which one seeks to exercise any of the aforementioned rights;
- Indicate the right you wish to exercise.

The response will be issued within a maximum period of 120 days, counted from the date on which the corresponding request was received, which, if appropriate, will be made effective within a period of fifteen days after the date on which the response is communicated. to the owner, which may be done through any of the following means: Customer service, email, by phone.

8. Conservation of the data provided.

The person in charge will ensure that the personal data contained in the databases are pertinent, correct and updated for the purposes for which they were collected.

When the personal data is no longer necessary for the fulfillment of the purposes set forth in the privacy notice and the applicable legal provisions, they must be cancelled. The person in charge of the database will be obliged to eliminate the information related to the breach of contractual obligations, once a period of seventy-two months has elapsed, counted from the calendar date on which the aforementioned breach occurs.

The cancellation of personal data will give rise to a blocking period after which the data will be deleted. The person in charge may keep them exclusively for the purposes of the responsibilities arising from the treatment. The blocking period will be equivalent to the limitation period of the actions derived from the legal





relationship that grounds the treatment in the terms of the applicable Law in the matter. Once the data is canceled, the owner will be notified.

9. Changes and consent of the Privacy Notice.

Turicard may make changes to this privacy notice at any time and will be made aware of it by any of the following means:

Through a registered email;

With a message or note visible on our Website.

We recommend the User to permanently review the content of this privacy notice, on our Website at the address: http://www.turicard.com/avisodeprivacidad

The User declares that the personal data provided to Turicard has been obtained in a free, informed, voluntary and unequivocal manner and consents to Turicard processing them in terms of the Law and this Notice.

Date of last update of this Privacy Notice: February 09, 2023.

