

Global Privacy Notice

This Global Privacy Notice describes the types of personal data that we, Andromeda Services, S.A. de C.V. (Andromeda), collect, the purposes for which we collect, use, disclose and process that personal data, as well as the measures we take to protect the security of such information.

In addition, we inform you about your rights and options regarding the use of your personal data, as well as the ways you can contact us about our privacy practices.

Our privacy practices may vary since these adhere at all times to the established requirements within the regulation of each one of the countries where our customers are located.

1. Identity and Address of the Responsible Entity

Andromeda Services, S.A. de C.V. is a corporation organized under the laws of Mexico, having its registered office at Petén, no. 410, Colonia Vértiz Narvarte, Alcaldía Benito Juárez, Mexico City, C.P. 03600.

For any matter related to this Global Privacy Notice, please feel free to write to us to the following e-mail: legal@andromeda.mx

2. Personal data

Any information related to an identified or identifiable natural person that we may use to identify, locate or contact a prior, current or potential customer, provider and/or employee, which has been shared with Andromeda through its web pages, forms, chatbots, social media, apps, e-mails, interviews, contracts, as well as the attention provided through its employees and managers either remotely or face-to-face.

The categories of personal data that we may collect are:

a) Contact information and other identifiers: name, e-mail address, Internet Protocol (IP) address, geo-tracking, signature, telephone number, position, area and/or department of the company/institution where the natural person works, official identification number, driver's license number and/or passport number, bank account number, taxpayer identification number or code, among others.

b) Usage data: information on the internet, devices and mobile apps activity, including, but not limited to, browsing history, search history and information on the interaction of a user with a web site, app or advertisement, collected by automated means, such as cookies or similar technologies.

c) Job application data: the data indicated on subsection a) concerning the contact information and other identifiers, including academic data, professional data, family data, social security number, work history, personal and work references, Population Registry Unique Code, among others.

As a visitor to our web site, you do not have to provide personal data in order to use it, since the web site only collects, through a contact form, personal contact data that are voluntarily provided by the visitors, in case they want to contact us.

This information consists of the name of the company or institution where you work, your name, institutional e-mail, telephone number, country and city.

We do not request sensitive information (for example, data related to race or ethnicity, religious beliefs, criminal records, physical or mental health, or sexual orientation) of the visitors.

If necessary, for human resources purposes, we will obtain your express consent in writing to collect and use said information.

3. Purposes of processing of your personal data

We can use your personal data to:

- a) Identify and contact you.
- b) Incorporate your dossier as customer/supplier or potential customer/provider and register you in our systems.
- c) Create, keep and update a database with personal and professional information of our employees.
- d) Draw up the corresponding employment and provision of service agreements, as well as to inform the need to make amendments thereof.
- e) Verify that there are no conflicts of independence with our employees or partnerships.
- e) Train and evaluate our employees.
- d) Prepare quotations and provision of service proposals.

- e) Provide you with the services that you contract with us and to comply with the obligations undertaken with you.
- e) Comply with the applicable regulation.
- f) Carry out the process related to invoicing.
- g) If applicable, carry out collection management.
- h) Evaluate the quality of our service.
- i) Defend our statutory rights.
- j) For advertising, marketing and promotional purposes.
- k) Process your job application.
- l) Support our daily commercial purposes, such as account management, quality control, web sites management, business continuity and disaster recovery, information security, corporate governance, notification and legal compliance.
- m) If requested by any relevant authority or by writ.

The processing (use) with regard to personal data of the Holders will be only for the aforementioned purposes and through the employees or individuals designated by Andromeda, being expressly prohibited its disclosure, therefore, through this notice, the confidentiality obligation for anyone who has access to said personal data is forewarned, indicating that, in case of non-compliance with this obligation, they shall be subject to the corresponding civil and criminal consequences, holding Andromeda harmless.

The foregoing is applicable even when this information was processed by a third party, upon request and entering into a third-party personal data transmission and protection agreement, and only for the purposes of covering any necessary internal process, keeping the confidentiality at all times. Andromeda takes all the necessary and sufficient actions to ensure that this global privacy notice is fulfilled by Andromeda or by any third party with whom it has any sort of relationship to provide the corresponding services.

By virtue of the foregoing, such third parties shall not be able to use the information provided by Andromeda in any other way different from the provisions set forth in this notice. These transfers of personal data shall be carried out implementing all the appropriate security measures, in accordance with the principles set forth in the Federal Law on the Protection of Personal Data

in the Possession of Private Parties, its Regulations and the Privacy Notice Guidelines, in the case of Mexico It is worth mentioning that, depending on the country you are from, we will process your personal data only when we have a legal basis for it.

4. Use, transfer and/or disclosure limitation of your personal data

In Andromeda, we do not transfer or disclose your personal data, except in cases where any of the exceptions established in the international regulations and in the regulations of each country is updated, for example:

- a) In compliance with the requirements, or court or administrative orders, including the regulatory authorities and the courts of each country, for the safeguarding of the public interest, or for the law enforcement and administration of justice.
- b) When the transfer is necessary under an agreement entered into or to be entered into in the interest of the personal data holder, by and between Andromeda and a third party.
- c) When the transfer is necessary for the maintenance or compliance with a legal relationship between the responsible entity and the holder.
- d) With third parties whose functionalities (e.g., third parties' cookies, widgets, plug-ins) are integrated into our services or our web site.
- e) With social media when you interact directly with said social media.

The data that we collect from you are transferred, accessed, processed or stored in a jurisdiction which is likely to be different from its origin, therefore, the data is subject to the compliance requirements of several countries. It is possible that some of these jurisdictions, including the United States, do not provide equivalent data protection levels, therefore, at all times, we adhere to the necessary requirements to comply with all the international, foreign and domestic regulations.

5. Rights of the personal data holders

For the purposes of this notice, the following terms shall have the meaning described below and, for those that are not defined, it shall be understood that they will be supplied by the applicable international or local regulation.

a) "ARCO rights": shall mean the rights of access, rectification, cancelation and opposition that each holder has in regard to the personal data collected by the responsible entity and/or the person in charge, and which are described below:

i) "Right to Access": is the right that the holder has to know about the personal data related to himself/herself held by the corresponding responsible entity or the person in charge, as well as to know to whom the data had been shared with and for what purpose.

ii) "Right to Rectification": each holder has the right to have his/her personal data rectified when these are inaccurate or incomplete.

iii) "Right to Cancelation": each holder has the right to request at any time to have his/her personal data removed, which will happen once the data lock period is over. The data lock implies the identification and retention of personal data once the purpose for which they were collected is fulfilled, and aims to determine the possible responsibilities regarding their processing, until the legal or contractual lapsing term of these. Once the corresponding data is canceled, the responsible entity will give the corresponding notice to the holder. In case the personal data had been transferred prior to the rectification or cancelation date and are still processed by third parties, the responsible entity shall inform to the corresponding third party about said rectification or cancelation request, so that the third party proceeds accordingly.

iv) "Right to Opposition": each holder may oppose the responsible entity to process the personal data in the following assumptions:

- When personal data are processed based on a public interest task or on legitimate interest, including the creation of automated profiles.

In this case, Andromeda will stop processing the data, unless it proves there are compelling reasons that prevail over the interests, rights and liberties of the interested party, or for filing, lodging or defending a claim.

- When the processing aims to direct marketing, also including the previously mentioned creation of profiles.

When exercising this right for this purpose, the personal data will cease to be processed for said purpose.

b) "Right to be forgotten or erasure": the holder may request the total elimination of his/her personal data in certain cases, such as the following:

- i) When they are no longer necessary according to their purpose.
- ii) Withdrawal of consent.
- iii) Exercising the right to opposition on said data or when they are illegally processed.
- iv) When one of the following circumstances occur:
 - Personal data are no longer necessary in regard to the purposes for which they were collected, or they are otherwise processed differently.
 - The holder withdraws the consent on which the processing is based, and this consent is not based on another legal grounds.
 - The holder opposes the processing under the right to opposition, for personal reasons or marketing, and no other legitimate reasons prevail for the processing.
 - The personal data had been illegally processed.
 - The personal data must be removed to comply with a legal obligation.

c) "Right to Limitation": it allows the interruption of the holder's data processing in some cases, such as challenges, or data retention even in the cases in which it is not necessary for some administrative or legal reason.

d) "Right to Portability": each holder will have the chance to request a copy of his/her data to the processing responsible entity and to have it in a standardized and mechanized format.

6. Procedure and mechanisms for the holder to exercise his/her rights regarding his/her personal data

Any holder or, when applicable, his/her legal representative may exercise the rights to access, rectification, cancelation, opposition, oblivion or erasure, limitation and/or portability, and the responsible entity shall provide the means to allow them a timely exercise of their rights.

The exercise of each of the aforementioned rights may be requested in writing to the responsible entity's address, or to this e-mail: legal@andromeda.mx, in accordance with the following:

- a) The written and/or electronic request for access, rectification, cancelation or opposition shall contain and include:
 - i) The name and address of the holder or any other means to communicate the response to his/her request.

ii) The documents certifying the identity or, when applicable, the legal representation of the holder.

iii) The clear and accurate description of the personal data for which any of the aforementioned rights is sought to be exercised.

iv) Any other item or document that facilitates the tracing of personal data.

b) In the case of rectification requests, the holder shall indicate the amendments to be made and provide the supporting documentation for his/her request.

c) The responsible entity shall communicate to the Holder within twenty business days from the date on which the access, rectification, cancelation, opposition, oblivion or erasure, limitation or portability request was received, the resolution adopted so that, if appropriate, it is implemented within fifteen days after the date on which the response is communicated. In the case of access to personal data requests, the delivery, prior accreditation of the identity of the applicant or legal representative, shall proceed, as appropriate. The aforementioned periods may be extended only once by an equal period, provided that the case's circumstances so warrant.

d) The consent withdrawal may be done at any time, without retroactive effects. In order to initiate the withdrawal process, you must accurately indicate in writing the type of consent you want to withdraw or send an e-mail to: legal@andromeda.mx.

The withdrawal and exercise of the aforementioned rights shall be free of charge, you shall only cover the justified shipping costs, or the cost of hard copy reproduction or any other format established in your request.

7. Personal data retention period

The personal data provided to the responsible entity may be retained for a period of up to 10 years, or the necessary time, by physical and/or electronic means, and subsequently discarded in order to avoid an improper processing of data.

The obligation of access to the information shall be deemed as fulfilled when the personal data are made available for the holder; or by the issuing of uncertified copies, electronic documents or any other means provided by the responsible entity.

In case the holder requests the access to the data to an individual presumed to be the responsible and this person turns out not to be so, it shall suffice for the holder to be informed through any of the printed (no proceeding letter) or electronic (e-mail, optical means, etc.) means, to fulfill the request.

8. Safety measures to protect your personal data

Your personal data shall be safeguarded under strict confidentiality and in order to reasonably avoid the unlawful use or disclosure of data, we have implemented both physical and technical, as well as administrative safety measures, in accordance with the applicable regulation.

In particular, we have a privacy policy, training courses for our employees, restricted access to personal information only to the authorized users, a privacy officer, a personal data inventory, risk analyses and contractual clauses.

The responsible entity may deny the access to personal data, the rectification, cancelation or granting of opposition to data processing in the following assumptions:

- a) When the applicant is not the holder of the personal data, or the legal representative is not duly certified to be so.
- b) When in its database the applicant's personal data are not found.
- c) When a third party's rights are undermined.
- d) When there is a legal impediment, or the resolution of a relevant authority that restricts the access to personal data, or that does not allow the rectification, cancelation or opposition to data processing.
- e) When the rectification, cancelation or opposition has been previously carried out.

On the other hand, the responsible entity shall limit the use of the data upon express request by the holder, and shall not be bound to cancel the personal data when:

- a) They involve the parties of a private, corporate or administrative agreement, and they are necessary for its development and compliance.
- b) They must be processed pursuant to legal provisions.
- c) They hamper court or administrative records linked to tax obligations, investigation and prosecution of criminal offences, or the update of administrative penalties.
- d) They are necessary to protect the legally safeguarded interests of the holder.
- e) They are necessary to file an action in accordance with the public interest.

f) They are necessary to comply with a legally acquired obligation by the holder.

9. Additional information for certain jurisdictions

In this section we establish additional information as per the current privacy law requirements in certain jurisdictions.

a) For California residents

In this section we provide information for California residents as per the California privacy law requirements, including the CCPA, which requires us to provide them with certain specific information on how to handle the personal information, whether it is collected online or offline.

This section does not address nor applies to our handling of:

i) Publicly available information made legally available by state or federal governments.

ii) Personal information subject to waiver under Section 1798.145(c) – (f) of the CCPA (such as medical information protected which is subject to the Health Insurance Portability and Accountability Act, HIPAA, or to the California Medical Information Act, and the non-public information subject to the Gramm-Leach-Bliley Act or to the California Financial Information Privacy Act).

iii) Personal information that we collect on job applicants, independent contractors or employees and staff, current or prior full-time, half-time and temporary Andromeda executives, managers or owners.

iv) Personal information on the people working for other company or on its behalf, to the extent the information is related to our transactions with said company, products or services we receive or provide to said company, or related communications or transactions (except when said people have the right to exclude themselves from any sale of their personal information and are not subject to any type of discrimination for exercising this right).

b) Categories of personal information we collect and disclose.

Our collection, use and disclosure of personal information of a California resident shall vary depending on the circumstances and the nature of our interactions or relationship with said resident.

c) California residents' rights.

California law grants California residents certain rights and imposes restrictions on private business practices as set out below:

i) Do not sell: California residents have the right to exclude themselves from our sale of their personal information. As stated above, Andromeda does not sell any type of information containing personal data of third parties.

ii) Initial notice: we are obliged to notify California residents, before or at the moment of the collection of their personal information, the categories of personal information collected and the purposes for which this information is used.

iii) Elimination request: California residents have the right to request the elimination of their personal information we have collected on them, and to have said personal information deleted, except for when a waiver applies. We will respond to the received verifiable requests from California residents as required by the law.

iv) Information request: California residents have the right to request and, subject to certain waivers, receive a copy of the specific personal information we have collected, used, disclosed and sold about them within the previous 12 months and to receive it, free of charge, whether (a) by mail or (b) electronically in a portable format and, to the extent technically feasible, readily usable, that allows the individual to convey this information unhindered. California residents also have the right to request us to provide them with certain information on how we have handled their personal information in the past 12 months, which includes:

- The categories of personal information we collect.
- The categories of personal information sources.
- The business or commercial purposes for collecting their personal information.
- The categories of third parties with whom we have shared their personal information.
- The categories of disclosed personal information for a commercial purpose within the previous 12 months, and for each identified category, the categories of third parties to whom we disclose that particular category of personal information.

California residents may perform two requests of information every 12 months. We will respond to the received verifiable requests from California residents as required by the law.

v) Right to non-discrimination: the CCPA prohibits the discrimination against California residents for the exercise of their rights under the CCPA.

There might be discrimination if a business denies or provides a different level or quality of goods or services, or if it charges (or suggests it will charge) different costs, fees or penalties to the residents that exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data.

vi) Financial incentives: a company may offer financial incentives for the collection, sale or elimination of California residents' personal information, to the extent the incentive is not unfair, unreasonable, coercive or usurious, and is made available in accordance with the applicable requirements for accountability, informed consent and exclusion. California residents have the right to be notified about any offer of financial incentives and their essential conditions, the right to exclude themselves from said incentives at any time, and they cannot be included in said incentives without their prior informed consent for such inclusion. At this moment, we do not offer such incentives.

vii) Submission of requests. The Do Not Sell requests (exclusion option), the information requests and the elimination requests may be submitted:

- By sending a request to the e-mail: legal@andromeda.mx.
- Via a telephone call to this phone number (+52) 55-5929-3081.

We will use the following process to verify the information requests and the elimination requests: we will acknowledge receipt of your consumer request; we will verify it through the processes required by the law, then we will process and respond to your request as required by the law. In order to verify such requests, it is likely that we will require you to provide us the following information:

- In the case of a request to know the personal information categories that we collect, we will verify your identity until a reasonable certainty degree by aligning at least two data points provided by you with the information in our systems, which is deemed reasonable reliable for the purposes of consumer identity verification.
- For a request to know specific personal information or for requests of elimination, we will verify your identity with a high certainty degree by aligning at least three personal data provided by you with the personal information safeguarded in our systems, and also by obtaining a signed statement under penalty of perjury stating that the applicant is the consumer whose personal information is the subject matter of the request.

An authorized agent may make a request on behalf of a California resident by providing a valid power of attorney under the California law, or by providing

the following: (1) evidence that proves the consumer authorized the agent to make the request; (2) verification of his/her own identity in regard to the right to know the categories, the right to know the specific personal data, or the requests of elimination described above; and (3) direct confirmation that the consumer has granted the authorized agent permission to submit the request.

We will respond to the received verifiable requests from California residents as required by the law. For further information, please feel free to write us to the following e-mail: legal@andromeda.mx

b) For the European Union/European Economic Area residents

The European Union (EU) and European Economic Area (EEA) residents have the following rights, under the RGPF, in regard to their personal information:

i) Right to access: they have the right to get from us the confirmation of whether their personal information is being processed or not and, in that case, request access to the personal information. The information to which they have access to includes, but is not limited to, the purposes of processing, the categories of the relevant personal information and the recipients or categories of recipients to whom the personal information has been disclosed or will be disclosed. They have the right to receive a copy of the personal information that is being processed. In the case of additional copies requested by you, we may charge a reasonable fee based on the administrative costs.

ii) Right to rectify and complete the personal information: you may request the rectification of inaccurate data and the completion of incomplete data. We will inform the relevant third parties to whom we have transferred your data about the rectification and completion if we are legally bound to do so.

iii) Right to elimination (right to be forgotten): you have the right to request us the elimination of the personal information related to you in limited circumstances, such as:

- When the information is no longer needed for the purposes for which it was collected.
- When you withdraw your consent (when the data processing has been based on your consent).
- Secondary to a successful right to objection.
- When the information has been illegally processed.
- When the data must be deleted to comply with a legal requirement to which Andromeda is subject to.

We are not bound to comply with your request for deleting personal information if the processing of your personal information was necessary for:

- The compliance with a legal requirement.
- The filing, lodging or defending of legal claims.

iv) Right to processing restriction: you have the right to obtain from us the restriction to process your personal information. In this case, the respective data will be marked and will only be processed for specific purposes. This right can only be exercised when:

- The accuracy of your personal information is disputed, to allow us to verify its accuracy.
- The processing is illegal, but you do not wish that your personal information is deleted.
- The information is no longer necessary for the purposes for which it was collected, but you still need it to file, lodge or defend legal claims.
- You have exercised the right to object, and the verification of the prevailing foundations is pending.

v) We may continue using your personal information after a request for restriction, in the following cases:

- If we have your consent.
- To file, lodge or defend legal claims.
- To protect the rights of another natural or legal person.

vi) Right to data portability: you have the right to receive the personal information related to you, which you have provided to us in a structured, commonly used and machine-readable format, and you have the right to convey such data to another entity unhindered on our part, but in each case, only if the processing (a) is based on your consent or in the execution of an agreement with you and (b) is also being done by automated means.

vii) Right to object: you have the right to object at any time any processing of your personal information that has our legitimate interests as legal basis. You may exercise this right without incurring any costs. If you raise an objection, we have the chance to prove we have compelling legitimate interests that override your rights and liberties. The right to object does not exist, in particular, if the processing of your personal information is necessary to take actions before executing an agreement or to execute an already concluded agreement.

viii) Right to object our use of your personal information for purposes of direct marketing: you may request us to change the way in which we communicate with you for marketing purposes. You may request us not to transfer your personal information to non-affiliated third parties for purposes of direct marketing or any other purpose.

ix) Right to withdraw consent: if you have given us your consent for the processing of your personal information, you have the right to withdraw your consent at any time, without any impact on the legality of the processing based on the consent prior to its withdrawal.

x) Right to receive a copy of the security measures: you may request to receive a copy of the protection measures under which your personal information is transferred outside the EU/EEA. We may elaborate agreements of data transfer to protect the trade terms.

xi) Right to file a complaint to your local supervisory authority: you have the right to file a complaint to your local supervisory authority if you have any concern about how we are processing your personal information. We kindly ask you to try to address any problem with us first, although you have the right to contact your supervisory authority at any time.

c) For Brazil residents

The following information is applicable to the personal data of any individual who is related to the territory of Brazil that we process under the General Law for the Protection of Personal Data (LGPD):

i) Scope: in addition to the circumstances established above, the LGPD is applicable when we process the personal data subject to the protection of the fundamental rights to freedom, privacy and free development of the individuals' personality.

ii) Confidential personal data under the LGPD: the confidential personal data under the LGPD include personal data (as previously defined in the section Scope of this Notice) on the racial origin or ethnicity, religious beliefs, political opinion, trade union membership or organization of religious, philosophical or political nature, data related to health or sex life, genetic or biometric data, when linked to a natural person. Refer to the previous section on Personal Information Collected for further information on how we process the confidential personal data.

iii) Individual rights: under the LGPD, the individuals have certain rights related to their personal data, subject to other limitations in this law, as follows:

- Acknowledgement of the existence of data processing.
- Access to your personal data.
- Correction of incomplete, inaccurate or outdated data.
- Anonymization, lock or elimination of unnecessary or excessive data, or processed data in breach of the LGPD.

- Portability of data to another product or service provider, subject to the LGPD.
- Elimination of personal data, to the extent permitted by the LGPD.
- Information on the entities with which we have shared personal data.
- Information on the possibility to refuse consent and the consequences of such refusal.
- Withdrawal of consent.

iv) Children's personal data processing: we process personal data belonging to children and adolescents, defined as individuals of 12 years old or younger. In this case, in accordance with the LGPD, we process the children's personal data when it's in their best interest and with the specific consent of at least one of their parents or legal representatives.

v) How to contact us in Brazil: if you have any question or comment on this global privacy notice, in regard to the LGPD or our processing activities in Brazil, please contact our Data Protection Manager by sending an email to: legal@andromeda.mx.

10. Intellectual property rights; prohibition of the use of Andromeda's name, logos and trade notices

This web site and its contents are protected by copyright and/or industrial property rights, such as trademarks, logos and trade notices, among others, registered in Mexico and/or other countries. Thus, Andromeda and/or its shareholders of such intangible assets, reserve all related rights, therefore, you will not be able to use any of the names, trademarks or distinctive marks of any press release, advertisement or any other promotional, marketing or communication material, whether it be in written, oral, electronic, visual or any other form without prior authorization.

To request such written authorization, please contact us via the following e-mail: legal@andromeda.mx

The references to third parties' names or trademarks in this web site are merely for identification purposes and do not mean these parties have approved this web site or its contents. These terms of use do not grant in any way the right to use a third party brands.

11. Amendments to the global privacy notice

Changes to this global privacy notice may be made by the responsible entity at any time it is deemed necessary, whether it be due to the addition of new services or due to regulatory amendments. The changes will be available on Andromeda's web site; therefore, the holders will be informed of the updated terms and contents of this notice at any time.

12. Tacit consent regarding the contents and scope of the global privacy notice

Nevertheless, if the holder provides his/her personal data to the responsible entity, it means he/she has read, understood and accepted its contents and scope; therefore, he/she agrees with the entirety of the aforementioned terms in regard to the use and processing of his/her personal data.

Last review: 07/07/2022.