

**TOPTAL, S.C. (Stanton Chase)**

In accordance with the provisions of the Federal Law on the Protection of Private Information in Possession of Private Parties, its Regulations and the Privacy Notice Guidelines, we hereby provide you (indistinctly referred to as **“You”** or the **“Holder”**) with the Privacy Notice (hereinafter the **“Privacy Notice”**), which is supplied to the *employees; workers; clients; consultants; users; suppliers; contracting parties; and/or contractors of TOPTAL, S.C.* (**“Us”** or **“We”**).

In virtue of the above, we want **“You”** to understand our privacy policies, specifically the personal data and information that we compile, how such information is used, how and with whom such information is shared and what we do to protect it; additionally, we are committed by Law to ensure compliance with the principles of protection of your personal data by adopting the necessary measures for their application and following the privacy practices indicated by the applicable legal ordinances, as follows:

- a) **OUR IDENTITY AND ADDRESS:** **“We”** have our address at *Avenida Paseo de la Reforma No. 195, Piso 5, Colonia Cuauhtemoc, in Mexico City, Zip Code 6500*; we shall be responsible for treating the personal data you provide in accordance with this Privacy Notice, indicating the aforementioned address for all legal effects derived from the handling of the information supplied on the personal data registration forms contained on the website: [www.stantonchase.com](http://www.stantonchase.com) (the **“Site”**) and the other websites we own, or by any other means, be it electronic, optical, audio, visual or by any other means of contact, by means of which Personal Data is received and/or exchanged.
- b) **THE PERSONAL DATA WE COMPILE:** The data that **“You”** provide us with on the **“Site”**, through the available registration forms, freely and voluntarily supplied to be treated in accordance with Sections d) and e) of this Privacy Notice, includes: (i) First name(s), paternal surname and maternal surname; (ii) address; (iii) date of birth; (iv) landline and/or mobile telephone number; (v) email address; (vi) marital status; (vii) level of education and occupation; (viii) property or financial data; (ix) employment history; (x) Federal Taxpayers’ Registration code; (xi) Personal ID Registration Code; (xii) Social Security Number; (xiii) sex; (xiv) Level of Studies; (hereinafter the **“Data”**). **“We”** can make the investigations and actions that are deemed necessary in order to directly verify, or through third parties hired to this effect, agency or authority, the veracity of the **“Data”** provided to us.
- c) **THE SENSITIVE PERSONAL DATA WE COMPILE:** Part of the information provided to us as a consequence of our legal relationship may be considered, by Law, as **“Sensitive Personal Data”**, i.e., that intimate personal information or the improper use of which may lead to discrimination or a serious risk for the **“Holder”**. Specifically, the personal data we compile shall be used for the performance of the activities related to our contractual relationship, and therefore its inclusion in our database is duly justified by Law.

- d) **TREATMENT GIVE TO YOUR DATA:** The main purposes of using your **“Data”** is: (i) To corroborate your identity and the veracity of the supplied information, including that of your beneficiaries, references and interested third parties, as applicable; (ii) To form files, databases and the necessary systems for performing the corresponding operations; (iii) To maintain the generated legal relationship; (v) To develop, where applicable, the promotion of prizes, scoring systems and compliance with specific provisions and guidelines, as well as the corroboration, accreditation or training for certifications; (vi) To carry out a risk and financial solvency analysis; and to comply with safety and hygiene regulations, policies and measures; (vii) To carry out the investigations and actions that we deem to be justified, in order to verify, through third parties hired for this purpose, be it an agency or authority, the veracity of the **“Data”** supplied to us; as well as for any activity derived from our legal and contractual relationship.

Irrespective of the foregoing, your personal data may be used for the following secondary purposes: (i) marketing, advertising and commercial prospecting and the promotion of different products that are related or not with the line of business contracted in our basic legal relationship; (ii) to carry out a statistical analysis, the generation of information models and/or profiles of current and forecast behaviors; (iii) the preparation of technical studies, surveys, statistics, indexes and promotions; (iv) for the management of insurance; (v) to promote the hiring of labor; (vi) recruitment; (vii) psychometric evaluations; (viii) for statistical information and the generation of reports; (ix) for the analysis of productivity and job demand; (x) for the analysis of the promotion and use of products and services; (xi) for quality and satisfaction surveys; (xi) for the sending of notices about products and services operated and promoted by **“Us”** or any third party with whom we have a contractual or legal relationship that allows it; (xii) for the implementation of advertising campaigns and/or promotions; (xiii) for marketing, advertising and commercial prospecting purposes; as well as (xiv) for all purposes related to the performance of commitments and obligations derived from our legal and contractual relationship, including the offering and promotion of goods and services of **“Us”**, our affiliates and their clients, as well as for all the purposes related to the fulfillment of our obligations.

Notwithstanding the above, **“You”** may state your refusal so that your **“Data”** is not used for the purposes described in this point through the procedure described in this Privacy Notice; however, you must take into account that, by providing your information and accepting the terms and conditions hereof, **“You”** explicitly accept that we shall use such data for the aforementioned purposes.

- e) **TRANSFER OF YOUR DATA:** In order to fulfill the purpose of this Privacy Notice and the acceptance given by **“You”** of its terms and conditions, **“We”** are authorized to transfer your **“Data”** to natural or legal third parties, be they Mexican or foreign, and to affiliated or subsidiary companies, belonging to any branch of industry and/or services, and therefore, in case of refusal to this regard, we would be most grateful if in continuation you would indicate the following:

\_\_\_ I accept \_\_\_ I do not accept the transfer of my personal data.

Notwithstanding the above, your data shall be used for the same purposes indicated in the above point and kept on different secure media allowed by technology, the access of which shall be limited only to those natural and/or legal persons with whom we share your information, accordingly. We have suitable security measures to protect the use of your **“Data”** by unauthorized third parties. In the case of a requirement by any authority, your **“Data”** may be made available thereto, in strict compliance with the applicable legal ordinances.

- f) **LIMITING OF THE USE OR DISCLOSURE OF PERSONAL DATA:** We have adopted the security levels and for the protection of personal data required by Law, irrespective of that other technical measures and means may be implemented to prevent the alteration or unauthorized access of the personal data provided by **“You”**.

The supplied information may be revoked at any time in accordance with the procedure mentioned in this Privacy Notice, except for that which: must be treated by legal provision; refers to the parties to a private, social or administrative contract and is necessary for its implementation and performance; when it hinders court or administrative procedures linked to tax obligations, the investigation and persecution of crimes or the imposition of administrative sanctions; that required to protect the legally protected interested of the **“Holder”**; that required to perform an action in accordance with public interest; and, that required to comply with an obligation that is legally assumed by **“You”**.

- g) **MEANS FOR EXERCISING ARCO RIGHTS:** At all times **“You”** have a right of access to your **“Data”** so as to request the rectification, cancellation or opposition thereof (hereinafter the **“ARCO Rights”**).

To exercise your ARCO Rights, you should send your respective written request to the following email address: [datospersonales@stantonchase.com.mx](mailto:datospersonales@stantonchase.com.mx) addressing your message to **TOPTAL, S.C.** and for the attention of Lizzeth Yadira Ramirez Castellanos.

The request to exercise your ARCO Rights must contain and be accompanied by the following: (i) the name of the **“Holder”**, address and/or email address and/or any other means of notification of the reply to your request; (ii) the official documents that prove the identity or, if applicable, the legal representation of the **“Holder”** (iii) a clear and precise description of the reasons for your request or claim and the precepts you believe have been infringed, as well as the **“Data”** regarding which you wish to exercise any of the aforementioned rights; and, (iv) any other element or document that facilitates the localization of the **“Data”**.

Once the written request indicating the use of your ARCO Rights has been received, we shall have THIRTY business days in which to analyze, attend and send you the corresponding reply. The means by which we shall send you our conclusion shall be the one **“You”** indicated in your request or, failing this, by the same means by which you sent us your written request.

- h) **MEANS OF COMMUNICATION:** Any communication that “**You**” wish to send us with regards to this Privacy Notice or to limit the use or disclosure of your “**Data**”, other than the procedures that we have established in this Privacy Notice, must be sent to the addresses provided for the exercise of the ARCO Rights, clearly and precisely stating: (i) the name of the “**Holder**”, address and/or email address; (ii) the official documents that prove the identity or, if applicable, the legal representation of the “**Holder**”; and, (iii) the purpose of your communication.
- i) **REMOTE MEDIA:** If, for any reason, “**You**” provide us with your “**Data**” using electronic media, including our website (Internet), “**You**” understand, accept and acknowledge that:
1. Our website may include links to third party websites that, in case of accessing them, will cause you to leave our website, and therefore we assume no liability with regards to third party websites.
  2. Our website may include links to social networking sites, in which case “**You**” accept that by providing any type of information, including your “**Data**” to such sites, will mean that it may be read, visited, accessed, retransmitted and used by any person, releasing us of all liability.
  3. It is possible that our systems compile addition data to that provided by “**You**” to us, such as the type of browser, the operating system, the visited Internet pages, the IP address, etc., by means of “*cookies*” or “*web beacons*”, among others. To disable these systems, you should go to the “*Internet Options*” menu in the “*Tools*” bar of your browser.

Similarly, “**We**” shall attend and reply to any communication sent to us within THIRTY business days following reception of such communication. The means by which we reply shall be the way “**You**” indicated, or failing this, we shall use the same means by which your communication was sent to us.

- j) **AMENDMENTS TO THE PRIVACY NOTICE:** This Privacy Notice may be amended by “**Us**” as many times as we deem necessary, to both maintain congruency with the applicable legal provisions, and at the request of the competent authorities and/or at our own discretion. Whilst we continue to use your information, or in the case that we change our identity, we require more “**Data**” from “**You**” in addition that mentioned herein, we change the purpose of this Privacy Notice and/or the transfer conditions change, any change that we make shall be made available to “**You**” through our website [www.stantonchase.com](http://www.stantonchase.com) and therefore we recommend that “**You**” visit it periodically.

# STANTON CHASE

I consent to that all my information mentioned in Section b) shall be used solely for the purpose indicated in Sections d) and e) of this Privacy Notice.

Understood and agreed

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Name; Signature; and (if applicable)  
Organization or Legal Entity you represent