

## **PRIVACY NOTICE**

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Garrigues México, S.C. (“**Garrigues**” or the “**Controller**”), with registered office at Paseo de la Reforma 412, Piso 24, Colonia Juárez, Delegación Cuauhtémoc, México, D.F., C.P. 06600, is the party responsible for the use and protection of your Personal Data and, in compliance with the provisions of the Federal Law for the Protection of Data Held by Individuals, its implementing regulations and other applicable provisions (the “**Data Protection Legislation**”), informs you of the following:

### **1. Purposes. For what purposes will we use your Personal Data?**

- The Personal Data we collect from you will be used for the following purposes, which are necessary for the service requested by you: (i) the maintenance, development, control and execution of the professional relationship held with Garrigues in the context of the provision of the Services; (ii) compliance with the applicable anti-money laundering legislation; (iii) invoicing, clarification and monitoring of payment collections; and (iv) personnel recruitment, selection processes, payroll and other related payments.
- Additionally, we will use your personal information for the following secondary purposes, which are not necessary for the requested service but will enable us to provide better client service: (i) the sending of information, advertising, communications and legal notices; (ii) the preparation of a report on the advisory services forming part of the Services in order to include them as Garrigues credentials, and (iii) other direct marketing, advertising or market research purposes.

### **2. Personal Data collected. What Personal Data will we use for these purposes?**

For the purposes described in this Privacy Notice, we will use the following personal data (the “**Personal Data**”):

- Identifying particulars (name, surname(s), date and place of birth, nationality, etc.).
- Contact details (address, telephone number, fax number, email address, etc.).
- Employment data (position, address, institutional email address, telephone number, academic transcript, professional certificate, etc.).
- Migration data (passport, immigration status, etc.).

- Billing data (name of payee, tax domicile, Federal Tax ID number or taxpayer identification number).
- Financial data (bank accounts, methods of payment, etc.).

**3. Personal Data Transfers. Who do we share your personal information with and for what purpose?**

We inform you that your Personal Data are transferred within and outside the country to the following individuals, companies, organizations and authorities other than us, for the following purposes and in the following cases:

- to other companies in the Garrigues Group, where it is deemed necessary to subcontract some or all of them, or any third party, for the provision of the services, for the sole purposes of the provisions of the Data Protection Legislation; and,
- to companies providing management and technical support services to Garrigues, to the extent that such access is essential for the performance by Garrigues of the services it provides.

The processing of the Personal Data by any subcontractor shall be in keeping with the instructions of the data subject, on the terms provided for in the Data Protection Legislation.

We undertake not to transfer your personal information to third parties without your consent, save in the exceptional cases provided for in article 37 of the Federal Law for the Protection of Data Held by Individuals, and to carry out such transfer on the terms established in that law.

If you do not object to the transfer of your Personal Data, it will be deemed that you have given your consent.

**4. Rights of access, rectification, cancellation and objection (ARCO). How can you access, rectify or cancel your Personal Data, or object to their use?**

You have the right to know what Personal Data we hold about you, the purpose for which it is used and the conditions of its use (Access); you also have the right to request the rectification of your personal information in the event it is out of date, inaccurate or incomplete (Rectification); you have the right to request the elimination of your data from our records or databases if you consider it is not being used appropriately (Cancellation); and you have the right to object to the use of your Personal Data for specific purposes (Objection). These rights are known as “**ARCO**” rights.

In order to exercise any of your ARCO rights, you should send a written request by mail to Garrigues at Paseo de la Reforma 412, Piso 24, Colonia Juárez, Delegación Cuauhtémoc, México, D.F., C.P. 06600, or send an email to the following email address: [privacidad.mexico@garrigues.com](mailto:privacidad.mexico@garrigues.com).

In relation to the procedure and requirements for exercise of your ARCO rights, we inform you of the following:

- The pertinent request must indicate and include (i) your name and address or any other means of notifying you of the response to your request; (ii) a copy of an official document evidencing your identity or, as the case may be, the identity of the legal representative, along with a document evidencing his/her representative authority; (iii) a clear and precise description of the Personal Data with respect to which you wish to exercise any of your ARCO rights; and (iv) any other element or document that facilitates the location of the Personal Data.
- If the request meets the above requirements, you will receive a response from our department within 15 calendar days, via the same means by which the request was sent (ordinary mail or email).

## **5. Personal Data Department**

The contact details of the personal data individual or department in charge of handling ARCO rights requests are as follows:

- Name of the personal data department: Department of Administration and Finance.
- Address: Paseo de la Reforma 412, Piso 24, Colonia Juárez, Delegación Cuauhtémoc, México, D.F., C.P. 06600.
- Email: [privacidad.mexico@garrigues.com](mailto:privacidad.mexico@garrigues.com)
- Telephone: +52 55 1102 3570

## **6. Revocation of consent to use your Personal Data or restrictions on its use and disclosure**

You may revoke any consent granted to us for the processing of your Personal Data. However, it is important to bear in mind that we may not always be able to heed your request or stop using your data immediately, since we may be under a legal obligation to continue processing your Personal Data. You should also take into consideration that, for certain purposes, the revocation of your consent will mean that we will no longer be able to continue providing the service requested by you, or will imply the termination of your relationship with us.

In order to revoke your consent, or to limit the use or disclosure of your personal information, you can send an email to the following email address [privacidad.mexico@garrigues.com](mailto:privacidad.mexico@garrigues.com) or contact our Administration and Finance Department directly at the address provided.

## **7. Changes to the Privacy Notice**

We reserve the right to make modifications, changes or updates to this Privacy Notice at any time in order to reflect legislative and judicial developments, internal policies, our needs or new requirements for the provision or offering of our services, market practices, or for other reasons.

We undertake to keep you informed of any changes to this Privacy Notice through our website [http://www.garrigues.com/en\\_GB/page/legal-terms](http://www.garrigues.com/en_GB/page/legal-terms), posting any change within a maximum of 10 business days after it is made.

Date of last update of this Privacy Notice: October 11, 2018.