

## Privacy Notice for Job Applicants

The protection of your privacy and the legal use of your Personal Data are matters of the utmost priority for Company México, S.A., a company established and existing under the laws of Mexico (hereinafter "Company", "we" or "us"), with a registered address at: Av. Benito Juárez 1102 Interior PB-C1, Colonia Centro, 64000 Monterrey, Nuevo León, and with website: [www.swbc.com](http://www.swbc.com) (the "Website").

Company is responsible for the use and protection of the Personal Data of Job Applicants (as such term is defined below) that is provided to us. According to the above, we have created this privacy notice (hereinafter, the "Privacy Notice"), which sets out the terms and conditions under which we will carry out the Processing of your Personal Data in order to protect your privacy and your right to informational self-determination, in accordance with the provisions of the Constitution of Mexico, the Law on Protection of Personal Data Held by Private Parties (the "Privacy Law"), the Regulations to the Privacy Law (the "Regulations to the Privacy Law"), and other applicable legal provisions in Mexico (hereinafter, all of the foregoing collectively or interchangeably referred to as the "Applicable Laws").

### I. DEFINITIONS

For the purposes of this Privacy Notice, the definitions of the terms "Personal Data", "Sensitive Personal Data," "ARCO Rights," "Days," "Data Processor," "Data Controller," "Data Subject," "Transfer," and "Processing" shall have, except as provided in this document, the same meaning ascribed to such terms in the Applicable Laws.

Likewise, the terms "Candidate" and "Job Applicant" refer to any Data Subject who applies for a vacant position at Company or provides their information for a job pool of Company.

### II. PERSONAL DATA COLLECTED

In order to carry out the purposes described in this Privacy Notice, we may collect and Process the following categories of Personal Data and information of Job Applicants:

- a) **ID and contact information.** Including full name, address (whether personal or work), telephone number (whether personal or work), mobile phone number (whether personal or work), email address (whether personal or work), current employer or business and job position.
- b) **Academic data.** Academic background, certificates and transcripts, information about education and academic performance, and information about courses, academic and/or professional programs, or certifications.
- c) **Employment data.** Employment history, curriculum vitae, awards or recognitions obtained, professional associations to which the Job Applicant belongs, employment references, and information related to previous jobs.
- d) **Data from public sources and/or received through consented transfers.** Data and information from public records, including criminal records, directories, social networks,

and other lawful sources available in the market, as well as Personal Data that has been shared with us by third parties to whom you have previously authorized.

e) **Financial information.** Credit history and credit bureau reports.

Company may also collect the following data and information, which is considered **Sensitive Personal Data**:

f) **Criminal background.** Letters, certificates, and any other information relating to criminal records, in accordance with applicable legal provisions.

The aforementioned Sensitive Personal Data will only be requested from candidates applying for job positions whose duties, by their nature, involve access to confidential, sensitive, and/or financial information of the Company, its customers, and/or employees.

The Personal Data described in the aforementioned sections are collected through any of the following methods: (i) the voluntary and direct provision of your information through our printed or digital forms, or by providing such information in person, (ii) the voluntary and direct provision of your information through the Website or any of our websites or those of other companies within the corporate group to which Company belongs, (iii) the voluntary and direct provision of your information by email or by phone, (iv) the voluntary and direct provision of your information through the use of professional platforms or social networks (e.g., LinkedIn), (v) the use of public access sources and other sources available in the market, including public records and social networks, and (vi) the transfer by other companies within the corporate group to which Company belongs, and other transfers consented to by third parties. The Personal Data and other information described in the preceding paragraphs may be contained in different documents, whether printed or in digital form. Company may request that you show original documentation and/or provide a copy thereof as evidence to support the information you provide.

### **III. PURPOSES OF PROCESSING**

**A. Necessary Purposes.-** The Personal Data we collect from you will be used for the following purposes, which **are necessary** to: (i) verify and confirm your identity and contact information; (ii) manage your recruitment, evaluation, and selection process, as well as to review and analyze your suitability for a possible job position with us; (iii) verify the provided information and analyze your job application and evaluate your knowledge, skills, abilities, and/or work skills; (iv) make a job offer according to our selection and/or hiring processes and criteria; (v) request employment references, as well as to conduct statistical reports; (vi) perform background checks and screening investigations as permitted by law to verify and confirm your information; (vii) manage your access to our facilities; (viii) to review and address your requests and/or comments; (ix) comply with applicable legal provisions, as well as to comply with the requirements of competent authorities; (x) comply with the obligations arising from the legal relationship between you and the Company; and (xi) send you notifications regarding changes to this Privacy Notice.

**B. Secondary Purposes.-** In addition, your Personal Data may be used for the following secondary purposes, which are **not necessary** for the recruitment, evaluation, and selection

process for employment but allow us to provide you with better service: (i) to maintain physical and/or electronic records of your data and information for our job pool for future employment opportunities; (ii) to evaluate and improve our recruitment, evaluation, and/or selection procedures for employment, and (iii) to communicate news and/or invite you to job-related events.

If you do not wish for your Personal Data to be used for these secondary purposes, please contact our People Department in accordance with the procedure outlined in Section VI of this Privacy Notice. The refusal to use and process your Personal Data for these secondary purposes will not impact or be a reason for us to deny or reject your participation in our recruitment, evaluation, and selection process for employment.

In the event that Company needs to use your Personal Data for purposes other than those stated in this Privacy Notice, you will be notified and/or informed in writing, by phone, electronically, or by any optical, sound, visual, or other means that technology allows now or in the future, explaining the new uses and/or purposes intended for your Personal Data in order to obtain your corresponding consent, whether express or implied, if necessary.

#### **IV. SECURITY MEASURES**

Company is committed to making its best efforts to safeguard the confidentiality of your Personal Data. Therefore, in compliance with applicable laws, Company maintains security measures to protect your Personal Data from unauthorized loss or destruction, theft, misplacement or unauthorized copying, use, access or processing, or unauthorized damage, alteration or modification.

Access to your Personal Data will only be granted to those individuals strictly authorized by us, including our representatives and employees, and the representatives and employees of other companies within the same corporate group to which Company belongs, as well as those third parties who, in their capacity as Data Processors, carry out the Processing of your Personal Data on behalf of Company.

#### **V. TRANSFER AND SHARING OF PERSONAL DATA**

Your Personal Data may be shared, within or outside the country, with the following individuals and for the following purposes:

<b>Recipient of Personal Data</b>	<b>Purpose</b>
Other companies within the same corporate group as Company	For corporate management and/or operational support by the corporate group of companies to which Company belongs; for purposes of analysis or labor prospecting; and for statistical purposes.

Competent authorities	To comply with any legal requirements or requests from competent authorities; to safeguard a public interest; for the pursuit or administration of justice; for the recognition, exercise, or defense of a right in a judicial process; as well as in other cases permitted by Applicable Laws and other current regulations.
Data Processors	Service providers and other Data Processors that process Personal Data on behalf of the Company, for the purpose of assisting the Company in fulfilling the purposes set forth in this Privacy Notice, including the performance of background checks and other screening investigations as permitted by Applicable Laws to verify and confirm the Data Subject's data and information.

## VI. ARCO RIGHTS AND CONTACT INFORMATION

At any time, you have the right to (i) access your Personal Data that we hold, (ii) rectify your Personal Data when it is inaccurate or incomplete, to the extent it is not impossible or requires disproportionate efforts, (iii) cancel your Personal Data, except in cases provided by Applicable Laws or this Privacy Notice, (iv) oppose to the Processing of your Personal Data for legitimate reasons and specific purposes, including objecting to the automated processing of your Personal Data in accordance with Applicable Laws, except when such Personal Data is necessary for Company to fulfill its legal obligations, (v) withdraw or revoke your consent and object to the processing of your Personal Data, except in cases where such Personal Data is collected and/or processed for purposes necessary for our recruitment, evaluation, and/or selection process for hiring, and/or to comply with obligations derived from the legal relationship between you and us (collectively referred to as "ARCO Rights").

You can exercise these ARCO Rights either directly or through your legal representative by submitting a written request (the "ARCO Request") addressed to our People Department at the following email address: [humanresources@swbc.com](mailto:humanresources@swbc.com), or to the following physical address: Av. Benito Juárez 1102 Interior PB-C1, Colonia Centro, 64000 Monterrey, Nuevo León, which will process your ARCO Request in accordance with the applicable laws.

To process the ARCO Request, Company requires the following information and accompanying documents:

- Full name of the data subject, and their email address or any other contact method to communicate the response to the ARCO Request;
- Documents that verify your identity and that of your legal representative, if applicable (photocopy in printed or electronic format of your ID or passport, and, if applicable, a photocopy in printed or electronic format of the public deed or power of attorney of your legal representative, along with a copy of their respective ID or passport);
- A clear and precise description of your request and/or the ARCO Rights you seek to exercise, as well as the Personal Data to which you want to apply any of such rights;
- Any other information or document that facilitates the location of your Personal Data; and,
- In the case of rectification requests, they must indicate the modifications to be made and provide the documentation that justifies such modification (when applicable).

Company will respond to the Data Subject's ARCO Request within 20 (twenty) business days from the date it is received, informing the Data Subject whether the request is granted or not. If the ARCO Request is accepted, it will be implemented within 15 (fifteen) business days following the date when Company informed the Data Subject of the acceptance. These deadlines may be extended once for an equal period when justified.

If the documents and/or information provided in your ARCO Request are incorrect or insufficient, or if the corresponding documents are not provided, Company may request you to provide the necessary information or documents to process your request. You will have 10 (ten) business days following the date of receiving our request for additional documents and/or information to provide such documents and/or additional information. Please note that if you fail to provide the requested documents and/or information during this period, your ARCO Request will be considered as not submitted.

Regarding requests for access to Personal Data, disclosure of such Personal Data shall be made after verifying the identity of the Data Subject and, if applicable, that of their legal representative. It will be considered that access to your Personal Data has been granted when they are made available to you, regardless of the medium or format used.

Please note that the revocation of your consent will only apply in certain cases as provided by the Applicable Laws and this Privacy Notice. Furthermore, the revocation of consent will not have retroactive effects and cannot prevent us from fulfilling our obligations.

If you have any questions regarding the Processing of your Personal Data or the procedure to exercise your ARCO Rights, please contact our People Department at the following email address [humanresources@swbc.com](mailto:humanresources@swbc.com), or by sending a written request to the following physical address: Av. Benito Juárez 1102 Interior PB-C1, Colonia Centro, 64000 Monterrey, Nuevo León.

## **VII. LIMITATION OF USE AND DISCLOSURE OF INFORMATION**

We will only retain and maintain your Personal Data for as long as necessary to fulfill the purposes established in this Privacy Notice, or as long as required to comply with applicable legal obligations.

To limit the use and disclosure of your Personal Data, please contact our People Department at the following email address: [humanresources@swbc.com](mailto:humanresources@swbc.com) or by sending a written request to the following physical address: Av. Benito Juárez 1102 Interior PB-C1, Colonia Centro, 64000 Monterrey, Nuevo León.

## **VIII. SENSITIVE PERSONAL DATA; PROTECTION OF MINORS, PERSONS UNDER INTERDICTION OR INCAPACITY**

Except as otherwise specified in this Privacy Notice, we do not knowingly collect or process Sensitive Personal Data or Personal Data of minors, persons under interdiction, or individuals with a disability that prevents them from making an informed decision. We encourage parents and/or guardians to take an active role in the online activities of their children and/or represented individuals. If we become aware that any Personal Data constitutes Sensitive

Personal Data or has been provided by any of the aforementioned individuals contrary to the provisions of this Privacy Notice, we will promptly delete such Personal Data. If you become aware that any Personal Data collected by Company constitutes Sensitive Personal Data or has been provided by any of the aforementioned individuals, please contact our People Department at the following email address: [humanresources@swbc.com](mailto:humanresources@swbc.com) or by sending a written request to the following physical address: Av. Benito Juárez 1102 Interior PB-C1, Colonia Centro, 64000 Monterrey, Nuevo León.

## **IX. CHANGES TO THE PRIVACY NOTICE**

Company reserves the right to modify this Privacy Notice at any time, especially if there are changes in our operations or applicable laws. Changes to this Privacy Notice will be published and made available through the Website, and/or will be sent to the email address you have provided, and/or communicated to you by any other permitted means.

## **X. DATA SUBJECT'S CONSENT**

The Data Subject represents and warrants that: (i) this Privacy Notice has been made available to him/her and accordingly disclosed by Company prior to the collection and/or Processing of his/her Personal Data, (ii) he/she has agreed to the terms and conditions set forth in this Privacy Notice, (iii) the Personal Data provided by the Data Subject to Company is clear, correct, and up to date for the purposes for which they were collected, (iv) he/she is legally capable to provide such Personal Data to Company, (v) he/she is of legal age and in full possession of his/her mental faculties, (vi) he/she will not provide directly or indirectly to Company any Sensitive Personal Data, other than the Sensitive Personal Data listed in this Privacy Notice.

The Processing of your Personal Data will be carried out in accordance with this Privacy Notice. By signing, you represent that you know and understand the content of this Privacy Notice and that you consent to the Processing of your Personal Data in accordance with the terms and conditions provided for in this Privacy Notice, including the Transfer of your Personal Data and the performance of background checks and screening investigations, where applicable.

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[Signature]

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[Data Subject's full name]

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[Date]

Last updated: May 23, 2025