

## Privacy Notice for Employees

The protection of your privacy and the legal use of your Personal Data are matters of the utmost priority for SWBC México, S. de R.L. de C.V., 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 its Employees (as such term is defined in this Notice) 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 Process 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 Federal 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", “Sharing” and "Processing" shall have, except as provided in this document, the same meaning ascribed to such terms in the Applicable Laws.

“Employee” is an individual who provides personal, subordinated work as defined in Article 8 of the Federal Labor Law, who has entered an employment agreement with the 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 our Employees:

- a) **Identification and Contact Data.**- Including, full name, address (whether personal or tax), landline phone number, mobile phone number, email address, date and place of birth, taxpayer identification number (RFC for its acronym in Spanish), Unique Population Registry Code (CURP for its acronym in Spanish), affiliation number with the Mexican Social Security Institute (IMSS for its acronym in Spanish) and other relevant authorities, photograph and signature, voter identification, passport or similar form of identification, marital status, names of beneficiaries.
- b) **Academic and Employment Data.**- Employment history and references, academic degrees and background, and other similar personal data.
- c) **Financial or Asset Data.**- Information regarding salary, earnings, and other employment benefits, debit card number and bank account information (including account

holder's name, bank account number, CLABE and bank of origin), and information regarding retirement fund administrators (AFORE for its acronym in Spanish) and credits from the National Workers' Housing Fund Institute (INFONAVIT for its acronym in Spanish) and the National Fund for Consumer Credit (FONACOT for its acronym in Spanish).

d) **Legal Proceedings.-** Information related to legal proceedings in which the Employee is involved, including proceedings where alimony payments are ordered.

e) **Data from public sources and/or received through authorized transfers.-** This includes data and information obtained from public records, including criminal records, directories, social networks, and other legally available sources in the market, as well as Personal Data that has been shared with us by third parties whom you have previously authorized.

Company may also collect the following data considered **Sensitive Personal Data**:

f) **Health Data.-** health information and medical history, as well as the results of medical examinations and/or studies that the Company may need to conduct in compliance with labor laws and other applicable legal provisions.

g) **Geolocation Data.-** Exact location data, including GPS coordinates and IP address, obtained through the use of geolocation or similar technologies installed in computers, cell phones and/or other mobile devices that the Company may provide to its Employees as work tools.

The Data described in the aforementioned sections may be collected through any of the following methods: (i) the voluntary and direct provision of your information through our printed or digital forms or by the provision of such information by the Data Subject in person, (ii) the voluntary and direct provision of your information by email, by phone, through the Website, or any other system (software) used by the Company, (iii) the provision of your information through the use of computers, cell phones and/or other mobile devices provided by the Company as work tools, (iv) the use of public sources or other sources available in the market, including public registries, search engines and social media, and (v) the transfer by other companies within the corporate group to which the 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) carry out the employment relationship and to fulfill the obligations arising from the legal relationship between you and us, (ii) process payroll and provide you with the employment benefits offered to you or due under applicable law and your employment agreement, (iii) compile and maintain your human resources

record, (iv) send you information about your employment relationship with Company, including relevant policies and regulations, (v) conduct technical assessments and evaluate your abilities, (vi) assess your qualifications for a position or role, and to communicate with you regarding available positions or services we offer, (vii) conduct research and analysis, generate statistical reports, establish compensation packages, and assess the performance and growth of Company, its affiliates, employees, and the labor market, (viii) create profiles and work structures that enhance and improve productivity, as well as for any other purposes that Company deems necessary for the improvement of working conditions, (ix) provide medical, life or other insurance, if eligible, (x) process medical leaves when ordered by the Social Security Institute, (xi) comply with our legal obligations regarding safety, health and hygiene, including the performance of medical examinations in accordance with applicable legal provisions, (xii) manage your access to our facilities and computer systems, (xiii) establish a digital fence or virtual perimeter that limits or restricts the use of computers, cell phones and/or other mobile devices provided by the Company to a certain geographic area, in order to protect the information and data contained therein, and for which it is required to collect data concerning the real-time location of the Employee, (xiv) for administrative purposes, to fulfill its legal obligations and comply with requests of competent authorities, as well as to resolve or defend against legal complaints and claims, and (xv) to send you notifications regarding changes to this Privacy Notice.

**B. Secondary Purposes.-** Additionally, your Personal Data may be used for the following secondary purposes, which **are not necessary** to fulfill the obligations arising from the legal relationship between the Company and you but help us provide better service:

- To prepare and issue employment certificates and references.
- To manage and send you notifications about offers, events, campaigns, notices, and/or promotional messages.

If you do not wish for your Personal Data to be used for these secondary purposes, please contact our Human Resources Department in accordance with the procedure outlined in Section VII of this Privacy Notice.

In the event that Company needs to use your Personal Data for purposes other than those stated in this Privacy Notice, you will be informed and/or notified 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, unauthorized use, access or processing, as well as unauthorized damage, alteration or modification.

Access to your Personal Data will only be granted to 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, both within and outside the country, with the following individuals and for the following purposes:

<b>Recipient of Personal Data</b>	<b>Purposes</b>
Other companies within the same corporate group as the 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.
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.
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.
Prospective buyers or acquirers	In the event of a merger or acquisition of the Company or other entities within the same corporate group, to allow the prospective acquirer or buyer to evaluate the legal and/or commercial situation of the Company.

## **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 the 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 internal records,

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 Human Resources 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 and the Personal Data to which you want to apply any of those 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 request 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 his/her 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 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 Human Resources 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 Human Resources 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 Human Resources 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, and (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 indicated in this Privacy Notice, including the Transfer of Personal Data if applicable.

Last updated: May 23, 2025

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[Signature]

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[Data Subject's full name]

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[Date]