



COMPREHENSIVE PRIVACY NOTICE SWBC MÉXICO

Pursuant to the Federal Law on the Protection of Personal Data Held by Private Parties ("LFPDPPP"), its regulations, and other applicable provisions in Mexico, we hereby inform you that SWBC México, S. de R.L. de C.V., a company duly organized and existing under the laws of Mexico ("SWBC" or the "Company"), with its address for purposes of this comprehensive privacy notice (the "Privacy Notice") located at Av. Benito Juárez 1102, PB-C1, Col. Centro, Monterrey, Nuevo Leon, Mexico 64000, and with the following website: www.swbc.com/swbc-mexico (the "Website"), is the Data Controller responsible for the Processing of the Personal Data collected by SWBC.

I. DEFINITIONS. For purposes of this Privacy Notice, the terms "Personal Data," "Sensitive Personal Data," "ARCO Rights," "Days," "Data Processor," "Disclosure," "Data Controller," "Data Subject," "Transfer," and "Processing" shall have, unless otherwise provided herein, the meanings assigned to such terms under the LFPDPPP and its regulations.

"Employee" means any natural person who provides subordinate personal services as defined in Article 8 of the Federal Labor Law and who has executed an individual employment agreement with the Company. Likewise, the terms "Candidate" and "Job Applicant" refer to any Data Subject who applies for a job opening at the Company or provides information for the Company's employment database

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:

- a) **Identification and contact data.** Including full name, age, gender, date and place of birth, nationality, telephone number, email address, home address, Federal Taxpayer Registry Code (RFC), Unique Population Registry Code (CURP), official identification, affiliation number with the Mexican Social Security Institute (IMSS) and other relevant authorities, marital status, photograph, physical and digital signature, and the names of beneficiaries.
- b) **Academic data.** Academic background, degrees, diplomas, transcripts, educational history, academic performance, and information related to academic or professional courses, certifications, or programs.
- c) **Employment data.** Employment history, résumé or curriculum vitae, awards or recognitions received, professional memberships, employment references, and information related to previous jobs.
- d) **Financial or asset-related data.** Information relating to salary, compensation and other employment benefits, credit history and credit bureau reports, tax information, bank account details (including account holder name, account number, CLABE, and originating bank), information relating to Retirement Fund Administrators (AFORE), and credit information from the National Workers' Housing Fund Institute (INFONAVIT) and the National Workers' Consumer Fund Institute (FONACOT).
- e) **Identification and contact data of beneficiaries.** Identification and contact information of dependents and/or beneficiaries of Employees, including full name, age, gender, date and place of birth, relationship to the Employee, telephone number, email address, home address, marital status, and copies of official identifications and/or birth, marriage or death certificates, as applicable.

f) **Legal proceeding data.** Information related to legal proceedings in which you are involved, including proceedings in which child support or alimony payments are ordered.

g) **Data from public sources and/or received through authorized transfers.** Information obtained from public records, including directories, social networks, and other legally available sources, as well as Personal Data shared with us by third parties whom you have previously authorized.

h) **Data for accessing online services.** Username, password, and other credentials managed by you on our online portals to access our online services.

i) **Personal data collected through automatic data-capture tools on our Website (cookies, email links, etc.).** Type of browser, language, date and time of your visit, time spent on the Website, IP address, referring URL, pages visited, operating system used to access the Website, and information about the system, browser and devices used, as well as data arising from or related to your interaction with our emails and/or our Website.

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

j) **Health data.** Medical and life insurance information. Medical history and health status, and the results of medical examinations and/or tests that the Company may be required to conduct in accordance with labor laws and other applicable legal provisions.

k) **Criminal background data.** Letters, certificates, and other information related to criminal records, in accordance with applicable legal provisions.

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

The Personal Data described in the foregoing 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 submitting such information in person; (ii) the voluntary and direct provision of your information by email, by telephone, through the Website, or through any other system (software), platform, or social network used by the Company; (iii) the provision of your information through the use of computers, mobile phones, and/or other mobile devices provided by the Company as work tools; (iv) the use of publicly accessible sources and other sources available on the market, including public records and social media; and (v) the Transfer of your information by other companies within the corporate group to which the Company belongs, as well as other authorized Transfers performed by third parties, including Employees.

The Personal Data and other information described in the preceding paragraphs may be contained in various documents, whether printed or in digital format. The Company may request that you present original documents and/or provide copies as evidence to support the information you submit.

III. PURPOSES OF PROCESSING.

3.1 Necessary Purposes.- The Company may use Personal Data for the following purposes, **which are necessary** for the existence, maintenance, and/or fulfillment of the commercial, employment, and/or legal relationship between the Company and you:

a) Clients and Suppliers: (i) manage and develop the commercial relationship, and comply with the obligations arising from the legal relationship between you and us; (ii) purchase, sell, provide, deliver, or receive products and/or services, as well as grant any type of credit; (iii) provide or receive information regarding the status of purchases, sales, deliveries, or receipt of products and/or services; (iv) manage product returns, exchanges, or service modifications; (v) install and/or assist in the assembly, setup, or delivery of products, or in the provision of services; (vi) evaluate whether the Data Subject or a third party may become, or continue to be, a supplier, distributor, reseller, or client of SWBC, and register such person in our database; (vii) manage and administer your access to our facilities, computer systems, and Website; (viii) for administrative purposes and to comply with legal obligations and the requirements of competent authorities; (ix) to resolve or defend legal claims and demands; (x) review and respond to your requests and/or comments; and (xi) send you notifications regarding changes to this Privacy Notice.

b) Candidates (Job Applicants): (i) manage the recruitment, evaluation, and selection process, and review and analyze your suitability for a potential job position with us; (ii) verify and confirm your identity and contact information; (iii) verify the information you provide and review your job application to assess your knowledge, skills, abilities, and/or job-related aptitudes; (iv) make a job offer in accordance with our internal hiring and selection processes; (v) request employment references and prepare statistical reports; (vi) conduct background checks and screening processes as permitted by applicable law to verify and confirm your information; (vii) carry out socioeconomic studies to understand the social, economic, and cultural environment of Candidates; (viii) manage and administer your access to our facilities; (ix) for administrative purposes and to comply with legal obligations and the requirements of competent authorities; (x) to resolve or defend legal claims and demands; (xi) review and respond to your requests and/or comments; and (xii) send you notifications regarding changes to this Privacy Notice.

c) Employees: (i) manage and develop the employment relationship and comply with the obligations arising from the legal relationship between you and us; (ii) process payroll and provide the employment benefits offered to you or to which you are entitled under applicable law and your employment agreement; (iii) create and maintain your human resources file; (iv) send you information regarding your employment relationship with the Company, including applicable policies and regulations; (v) conduct technical examinations and evaluate your competencies; (vi) assess whether you are qualified for a given position or function and communicate with you regarding available positions or services offered by the Company; (vii) conduct research and analysis, prepare statistical reports, establish compensation structures, and evaluate the performance and growth of the Company, its affiliates, employees, and the labor market; (viii) generate work profiles and organizational structures to increase and improve productivity, and fulfill any other purposes the Company deems necessary to improve working conditions; (ix) provide medical, life, or other insurance benefits, if applicable; (x) process disability leaves when authorized or ordered by the Mexican Social Security Institute; (xi) comply with legal obligations regarding health, safety, and hygiene, including performing medical examinations in accordance with applicable legal provisions; (xii) manage and administer your access to our facilities, computer systems and Website; (xiii) to 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 and to comply with legal obligations and the requirements of competent authorities; (xv) to resolve or defend legal claims and demands; (xvi) to review and respond to your requests and/or comments; and (xvii) send you notifications regarding changes to this Privacy Notice.

d) Beneficiaries: (i) verify and confirm their identity; (ii) share their information with insurance brokers and insurance companies in order to enroll, process and/or administer benefits under applicable insurance policies offered to Employees; (iii) contact them in the event that the Employee suffers an accident or in case of an emergency; (iv) review and respond to their requests and/or comments; and (v) send them notifications regarding changes to this Privacy Notice.

e) Visitors and Third Parties: (i) verify and confirm their identity; (ii) manage and administer their access to our facilities, computer systems and Website; and (iii) carry out video surveillance for security and theft-prevention purposes.

3.2 Secondary Purposes.- In addition, 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 which enable us to provide you with better service: (i) send or receive notifications about new products and/or services, whether or not related to those already acquired or contracted; (ii) send or receive information regarding changes to products and/or services; (iii) evaluate the quality of products and/or services; (iv) send or receive promotions; (v) carry out or participate in satisfaction surveys; (vi) communicate news and/or invite you to events; (vii) include a Candidate's information in our employment database for future job opportunities; (viii) provide employment references; and (ix) for marketing and/or commercial prospecting purposes.

If you do not wish your Personal Data to be used for any of these secondary purposes, please contact our Data Protection Department by sending an email to: humanresources@swbc.com

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. The Company is committed to making its best efforts to safeguard the confidentiality of your Personal Data. Accordingly, and in compliance with the LFPDPPP, the Company maintains administrative, physical and technological security measures designed to protect your Personal Data against damage, loss, alteration, destruction, or misuse, as well as against unauthorized access, processing or disclosure.

Access to your Personal Data will be strictly limited to those individuals duly authorized by the Company, who are required to maintain confidentiality and to Process such data in accordance with the terms set forth in this Privacy Notice.

While we adopt all reasonable measures and precautions to safeguard your Personal Data, it is not possible to guarantee the security of information transmitted over the internet. In this regard, please be advised that email is not a secure means of communication and therefore should not be used to send confidential or sensitive information.

V. TRANSFERS AND DISCLOSURES OF PERSONAL DATA. Your Personal Data may be shared, whether within or outside of Mexico, with the following parties and for the following purposes:

Recipient	Purpose
Other companies within the same corporate group as SWBC	For operational support and/or assistance from the corporate group to which the Company belongs; for employment or commercial prospecting purposes; and for statistical purposes.

Competent authorities	To comply with any legal requirements or requests from competent authorities; to safeguard the public interest; for the procurement or administration of justice; for the recognition, exercise or defense of a right in judicial proceedings; and in any other cases permitted by applicable law.
Data Processors	Service providers and other Data Processors that process Personal Data on behalf of the Company, for the purpose of helping us fulfill the purposes set forth in this Privacy Notice.
Prospective buyers or acquirers	In the event of a merger or acquisition of the Company, or of other companies within the same corporate group, so that the prospective acquirer or buyer may analyze the legal and/or commercial status of the Company.

The Company does not sell your Personal Data under any circumstances. Your Personal Data will only be shared with the recipients expressly identified in this Section, as well as in the other exceptional cases expressly permitted under applicable law.

VI. LIMITATION ON THE USE AND DISCLOSURE OF INFORMATION. We will retain and store your Personal Data only for the period necessary to fulfill the purposes set forth in this Privacy Notice, or for as long as required to comply with applicable legal obligations.

To limit the use or disclosure of your Personal Data, you may contact us at the following email address: humanresources@swbc.com, or by submitting a written request to the following address: Av. Benito Juárez 1102, PB-C1, Col. Centro, Monterrey, Nuevo Leon, Mexico 64000.

VII. 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, employment and/or commercial 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 Data Protection Department at the following email address: humanresources@swbc.com, or to the following physical address: Av. Benito Juarez 1102, PB-C1, Col. Centro, Monterrey, Nuevo Leon, Mexico 64000, which will process your ARCO Request in accordance with the applicable laws.

To process an ARCO Request, the 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, the 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 do not provide the requested documents and/or information within this period, your ARCO Request will be deemed 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 us at the addresses indicated above.

VIII. SENSITIVE PERSONAL DATA; PROTECTION OF MINORS, PERSONS UNDER LEGAL INCAPACITY, OR PERSONS WITH DISABILITIES. Except as provided in this Privacy Notice, we do not knowingly collect or process Sensitive Personal Data, nor do we knowingly collect or process Personal Data from minors, individuals under legal incapacity, or individuals with disabilities that prevent them from making an informed decision. We encourage parents and/or legal guardians to take an active role in the online activities of their children and/or individuals under their care.

If we become aware that any Personal Data constitutes Sensitive Personal Data or has been provided by any of the foregoing individuals in violation of this Privacy Notice, we will promptly delete such Personal Data. If you become aware that certain Personal Data collected by the Company constitutes Sensitive Personal Data or has been provided by any of the individuals mentioned above in violation of this Privacy Notice, please contact our Data Protection Department at the following email address: humanresources@swbc.com, or at the following address: Av. Benito Juarez 1102, PB-C1, Col. Centro, Monterrey, Nuevo Leon, Mexico 64000.

IX. CHANGES TO THIS PRIVACY NOTICE. The Company reserves the right to modify this Privacy Notice at any time, particularly if there are changes in our operations or in applicable laws. Any changes to this Privacy Notice will be published and made available through the Website, and/or sent to the email address you have provided, and/or communicated or disclosed to you through any other legally permissible means.

X. GOVERNING LAW AND JURISDICTION. This Privacy Notice shall be governed by and construed in accordance with the LFPDPPP and other applicable laws of Mexico. All parties expressly and irrevocably submit themselves to the exclusive jurisdiction of the competent courts located in Monterrey, Nuevo Leon, Mexico, expressly waiving any other jurisdiction that may correspond to them by reason of their present or future domicile, or for any other cause or reason.

XI. DATA SUBJECT CONSENT. The Processing of your Personal Data will be carried out in accordance with this Privacy Notice.

From the moment you: (i) use the Website and/or any of its subsites; (ii) complete and submit an employment or commercial application, or a request for access to our facilities; or (iii) directly provide us with your Personal Data or that of your beneficiary(ies), whether through our printed or digital forms, in person, by email, or by telephone, through the Website or any of its subsites, and/or through any professional platforms or social networks (for example, LinkedIn), it shall be understood that you and, where applicable, your beneficiary(ies) have read and are aware of this Privacy Notice and that you consent to the Processing of your Personal Data in accordance with the terms and conditions set forth herein, including the Transfer of your Personal Data when applicable. The foregoing is based on the understanding that your consent shall be deemed tacitly granted when, having been made available to you, you do not express your opposition.

Notwithstanding the foregoing, when applicable legal provisions require the Data Subject's consent to be expressed explicitly, such authorization or consent may be granted or recorded through the documents or means established by the Company for such purposes.

Last updated: December 1, 2025