

PRIVACY NOTICE

IDENTITY AND ADDRESS OF THE DATA CONTROLLER.

RESPUESTAS ÓPTIMAS EN MAYOREO, S.A. DE C.V. (hereinafter "**ROM REFACCIONES**"), with address for service and notification at Poniente 134 No. 680-A, Colonia Industrial Vallejo, Alcaldía Azcapotzalco, C.P. 02300, Mexico City, in compliance with the provisions of the Federal Law on Protection of Personal Data Held by Private Parties (hereinafter the "Law") and its Regulations, and for the purpose of guaranteeing the privacy of personal data, hereby informs you of this Privacy Notice.

PERSONAL DATA TO BE COLLECTED.

For **ROM REFACCIONES** to carry out the purposes described in this Privacy Notice, it will collect the following categories of personal data (hereinafter "Personal Data"):

- a. Identification data
- b. Contact data
- c. Financial and/or asset data
- d. Mobile device data and unique device identifier (IMEI)

If you visit our facilities by vehicle, we will also collect data on the license plates and model of the vehicle. It is important to note that **ROM REFACCIONES** will not collect or process sensitive personal data.

PURPOSES.

The information will be used for the following main purposes, which are necessary to provide you with our products and services:

- A. To identify you and verify your identity
- B. To record visitor arrivals and departures at our facilities.
- C. To control access and IT security at our facilities.
- D. To respond to and follow up on your requests for service, information, comments, and suggestions.
- E. To comply with the obligations set forth in the Law and applicable legislation.

The Data Subject cannot object to the processing of their Personal Data for the primary purposes indicated above, as the processing is necessary to comply with the obligations arising from the relationship between the Data Subject and **ROM REFACCIONES**.

Additionally, your information will be used for the following secondary purposes:

- a. To send you communications for marketing purposes and to provide you with information about solutions and services from industry suppliers.
- b. To conduct surveys to improve the quality of the products and services we offer.
- c. Your device's IMEI will not be used for marketing or advertising purposes.

If the Data Subject does not want their Personal Data to be processed for the secondary purposes indicated, or any of them, they can deny their consent from this moment on by sending us their request via email to arco.rom@gruporom.com, or by submitting their request in writing to Calle Poniente 134 No. 680-A, Colonia Industrial Vallejo, Alcaldía Azcapotzalco, C.P. 02300, Mexico City, for the attention of the Personal Data Protection Committee.

If the Data Subject expresses their refusal in this regard, it will not be a reason for **ROM REFACCIONES** to stop providing the products and/or services contracted with **ROM REFACCIONES**.

PERSONAL DATA PROTECTION COMMITTEE.

The **ROM REFACCIONES** Personal Data Protection Committee (hereinafter the "**Committee**") is responsible for the management and administration of the database and information concerning the Personal Data of the Data Subjects, as well as establishing and controlling a process for assisting Data

Subjects, granting them access to their data, and enabling them to exercise their rights of access, rectification, cancellation, and/or opposition (hereinafter the "ARCO Rights") regarding the processing of their Personal Data, as well as the limitation of its use and/or disclosure.

The Committee shall ensure that the Personal Data contained in the databases is relevant, accurate, and up to date for the purposes for which it was collected, and when it is no longer necessary for the fulfillment of the intended purposes, it shall be canceled.

The Data Subject may address any questions or comments regarding this Privacy Notice or exercise the ARCO Rights that correspond to them by law and its Regulations, in person before the **ROM REFACCIONES** Committee, located at Calle Poniente 134 No. 680-A, Colonia Industrial Vallejo, Alcaldía Azcapotzalco, C.P. 02300, Mexico City, or by sending an email to the following address: arco.rom@gruporom.com.

HANDLING, ADMINISTRATION, AND PROTECTION OF PERSONAL DATA.

The Committee is responsible for the confidential handling and administration of the database containing information concerning the Personal Data of Data Subjects, to regulate its lawful, legitimate, controlled, and informed processing, guaranteeing the privacy and protection of the property and moral rights of said data subjects.

TRANSFERS.

ROM REFACCIONES may transfer your Personal Data to third parties in accordance with the provisions of Article 36 of the Law.

Therefore, **ROM REFACCIONES** may transfer your Personal Data without requiring your consent to the following entities:

- i. Affiliated companies and related parties of **ROM REFACCIONES** or, where applicable, any company in the same group as **ROM REFACCIONES** operates under the same guidelines and Internal Policies regarding the protection of personal data.
- ii. Competent authorities in the cases provided for by the Law and applicable legislation.
- iii. Other transfers provided by the Law and its Regulations.

Third parties and entities receiving Personal Data assume the same obligations and/or responsibilities as **ROM REFACCIONES**, in accordance with the provisions of this Privacy Notice. **ROM REFACCIONES** will ensure that such third parties maintain the necessary administrative, technical, and physical security measures to safeguard your Personal Data, and that such third parties use your Personal Data solely and exclusively for the purposes for which they were contracted and in accordance with this Privacy Notice and the Law and its Regulations.

ARCO RIGHTS AND/OR WITHDRAW CONSENT.

Data Subjects may exercise their ARCO Rights as provided for in the Law. The ARCO Rights are described below:

- I. **Access:** The Data Subject may request to be informed of the type of Personal Data being processed by **ROM REFACCIONES**, the origin of such data, and any communications that have been made with it.
- II. **Rectification:** The Data Subject may request that any Personal Data held by **ROM REFACCIONES** that is incorrect or incomplete be corrected or completed. The Data Subject shall be obliged to inform **ROM REFACCIONES** when a change or correction must be made to their Personal Data and this fact is only known to them.
- III. **Cancellation:** The Data Subject may request that their Personal Data be canceled if it is still stored in the databases of **ROM REFACCIONES**. The cancellation process will be preceded by a blocking period during which their data will only be stored for a period of time equivalent to the limitation period for the actions that gave rise to the processing of their Personal Data or the period established by law.
- IV. **Opposition:** The Data Subject may oppose the processing of their Personal Data when there is a legitimate reason for doing so, even if they have previously expressed their consent to such processing.

The Data Subject may at any time **withdraw** consent given to **ROM REFACCIONES** for the processing of their Personal Data, limit the use or disclosure thereof, as well as exercise the ARCO Rights provided for in the Law, by sending their request to arco.rom@gruporom.com through the document called "**ARCO Rights Form**", In this document, the Data Subject shall describe the Personal Data to which they refer and the ARCO Rights they wish to exercise.

Likewise, the Data Subject may also exercise their ARCO Rights by sending a written request including their full name, telephone number, address, or email address for receiving notifications and a simple copy of their official identification to the address of **ROM REFACCIONES**, located at: Poniente 134 No. 680-A, Colonia Industrial Vallejo, Alcaldía Azcapotzalco, C.P. 02300, Mexico City. Attention: Committee.

If the information provided in the request is insufficient or erroneous to respond to it, or, where applicable, the necessary and essential documents for its attention are not attached, the Committee may request, within a period not exceeding 5 (five) business days, the information required to process it. In accordance with the above, the applicant will have a period of 10 (ten) business days after receipt to respond to the request.

It is important to mention that, if the information provided by the Data Subject is sufficient, the deadline for issuing a resolution will be 20 (twenty) business days from the date of receipt of the request.

In accordance with the provisions of the second paragraph of Article 31 of the Law, the period may be extended once for an equal period, if it is justified.

In the event that the request to exercise ARCO Rights is admissible and the Data Subject has been notified, said request shall be effective within 15 (fifteen) business days. The period may be extended once for an equal period, provided that it is justified. The Data Subject shall be notified of this through the means of contact previously established. **ROM REFACCIONES** shall be deemed to have complied at the time it delivers the correspondence to the postal service or on the date it responds to your email.

LIMITS ON THE USE OR DISCLOSURE OF PERSONAL DATA.

Likewise, the Data Subject of the Personal Data may limit the use or disclosure of their Personal Data in accordance with the following:

- Register with the Public Registry to Avoid Advertising (REPEP) belonging to the Federal Consumer Protection Agency (PROFECO). For more information regarding With this option, you can contact PROFECO directly or visit the following link: <https://repep.profeco.gob.mx/> or call 96 28 00 00 from Mexico City, Guadalajara, and Monterrey, and 800 962 8000 from the rest of Mexico.
- You can file your complaint at the following link <https://repep.profeco.gob.mx/Denunciar.jsp>, entering the requested information.
- Request that **ROM REFACCIONES** add you to its "Exclusion List" so that you do not receive information about our products and services. If applicable, the Data Subject will be registered on the **ROM REFACCIONES** Exclusion List.

PERSONAL DATA PROTECTION.

To protect your Personal Data, **ROM REFACCIONES** has a Privacy Policy, training courses, restricted access to personal information only to authorized users, an inventory of Personal Data, exclusion lists, risk analysis, and contractual clauses that allow the protection of Personal Data to comply with the security measures established in the Law and its Regulations.

VIDEO-RECORDED AREAS.

ROM REFACCIONES may record video in common areas of visitors to the facilities. The images and sounds collected by video surveillance cameras will be used for security purposes, as specified in the Privacy Notice for video-recorded areas, which can be consulted in the video recording areas at the **ROM REFACCIONES** facilities.

VIRTUAL VIDEO CONFERENCING PLATFORMS.

Please be advised that **ROM REFACCIONES** may convene and, where appropriate, hold meetings and/or any other type of gathering ("the event") via virtual videoconferencing platforms in order to meet with other people virtually. Therefore, if during your participation in "the event" you voluntarily turn on your camera and/or microphone during a recording, **ROM REFACCIONES** may capture, record, process, and store your voice, image, and video data. Please note that you may also participate in the event without the system accessing your image and/or voice.

Please also note that such Personal Data may be processed by the virtual video conferencing platform used, which will do so in accordance with its own privacy notice, in relation to the use of its online platform through which the events organized by **ROM REFACCIONES** will be held. However, the use of such platform is entirely independent and outside the responsibility of **ROM REFACCIONES**. If you do not agree with the processing of data by the virtual video conferencing platform, please do not register, and please note that in this case you will not be able to participate in "the event."

USE OF COOKIES.

To ensure that this website is well managed and to facilitate better navigation, **ROM REFACCIONES** uses cookies. A cookie is a file that is downloaded to the user's device when accessing certain web pages to store and retrieve information about the navigation that is carried out from that device. For additional information on how we use cookies and other tracking technologies and how you can control them, please see our **Cookies Policy**.

Cookies can be deactivated or disabled by following the procedures of the internet browser you use.

CHANGES TO THE PRIVACY NOTICE.

ROM REFACCIONES reserves the right to modify this Privacy Notice as it deems appropriate. This may be due to changes in applicable legislation or in its internal policies.

ROM REFACCIONES will inform you and make the updated Privacy Notice available to you when significant changes are made to it, through its website <https://www.romrefacciones.com>, in the Privacy Notice section, indicating the date of the latest version of the Notice.

It is important to mention that, once the change is published, it will take effect the day after its publication in the **ROM REFACCIONES** media indicated above.

CONSENT.

Your consent to this Privacy Notice is given at the time your Personal Data is collected for the purpose of requesting information about the services or products offered by **ROM REFACCIONES**, contracting the services provided by **ROM REFACCIONES**, and/or at the time you express your will through the physical and/or electronic means established for that purpose, for which you acknowledge that:

- a. You have been made aware of this Privacy Notice;
- b. You expressly consent to the processing of your Personal Data as indicated in this Privacy Notice.

QUESTIONS AND COMPLAINTS.

ROM REFACCIONES provides the Data Subject with the email address arco.rom@gruporom.com to contact in case of any complaints or questions regarding the services. The Data Subject may also send their questions or complaints to the address of **ROM REFACCIONES**, located at Poniente 134 No. 680-A, Colonia Industrial Vallejo, Alcaldía Azcapotzalco, C.P. 02300, Mexico City.

ROM REFACCIONES acknowledges that the website <https://www.romrefacciones.com> may experience malfunctions. If you encounter any problems on this site, please send an email to the following address: arco.rom@gruporom.com

QUESTIONS OR COMMENTS.

For any questions, concerns, or comments regarding this Privacy Notice, please contact **ROM REFACCIONES** via email at: arco.rom@gruporom.com

EXERCISE OF RIGHTS.

If the Data Subject considers that their Right to Personal Data Protection has been improperly processed or contrary to the provisions of the Law and its Regulations, they may obtain advice on exercising their rights regarding Personal Data Protection through the CONECTA Transparency Office, which belongs to Secretaría Anticorrupción y Buen Gobierno. For more information:

- Call the following telephone number: CONECTA 800 835 43 24. Hours of operation are from 9:00 a.m. to 5:30 p.m., Monday through Friday.
- You can also make an appointment to visit the office located at Avenida Insurgentes Sur 3211, Colonia Insurgentes Cuicuilco, Alcaldía Coyoacán, Postal Code 04530 in Mexico City. Office hours are from 9:00 a.m. to 5:30 p.m., Monday through Friday.
- Visit the following link: <https://transparencia.gob.mx/home.html>
- Or, by accessing the National Transparency Platform: <http://www.plataformadetransparencia.org.mx/>

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