

# PRIVACY NOTICE

## IDENTITY AND LEGAL ADDRESS OF THE RESPONSIBLE

**RESPUESTAS ÓPTIMAS EN MAYOREO, S.A. DE C.V.** (hereafter “**ROM REFACCIONES**”), located at Poniente 134 No. 680-A, Industrial Vallejo, Azcapotzalco, zip code 02300, Mexico City to listen to and to receive notifications, in accordance to the Federal Law on the protection of personal data held by private individuals (hereafter the “Law”) and its Regulation and, with the purpose of guarantee the privacy of personal data it makes of your knowledge this notice of privacy.

## PERSONAL DATA TO BE COLLECTED

In order for **ROM REFACCIONES**, to effect the described endings in this notice of privacy, it will collect the following categories of personal data.

- a. Identification data
- b. Contact data
- c. Bank data

It is important to mention that **ROM REFACCIONES** will not neither collect nor handle sensitive personal information.

## ENDINGS

The information will be used for the following main endings, which are necessary to provide our products and services.

- A. To identify you and verify your identity
- B. To make your registration in our facilities
- C. To attend and to follow up to your requirements of service, information, comments and suggestions.
- D. To accomplish with the obligations under the applicable law.

The Owner cannot oppose to the data processing for the main endings before set, derived from the fact that the data processing is necessary to accomplish the obligations derived from the partnership between the Owner and **ROM REFACCIONES**.

In addition to this, your information will be used for the following secondary endings:

- a. To send you marketing notices and, to send you information related to solutions and services of the industry's suppliers.
- b. To apply surveys in order to enhance the quality of the products and services we offer.

If the Owner does not want his/her personal data to be processed for the secondary endings set, or any of them, the Owner can deny his/her permission from this moment by sending us a request through the mail [arco.rom@gruporom.com](mailto:arco.rom@gruporom.com). In case the Owner express his/her refusal, this will not be a reason why **ROM REFACCIONES**, stops the provision of products and/or services before contracted with **ROM REFACCIONES**.

## DATA PROTECTION COMMITTEE

It is the responsibility of the Data Protection Committee of **ROM REFACCIONES** (hereafter “**Committee**”), the handling and management of the data base and of the related information to personal data of the Owners, in addition the establishment and management of a attention process to the Owners, to provide them access to such data, as well as the right to rectification, cancelation and opposition to the data processing, in addition to this the limitation to the use and/or disclosure of such data.

The Data Protection Committee ensures that the Personal Data contained in the data bases be relevant, correct and updated for the endings for such that data was collected and once they had stopped of being necessary for the accomplishment of the endings set, that data should be cancelled.

The Owner could make any question or comment from this Notice of Privacy or exercise the rights derived from the Federal Law on the protection of personal data held by private individuals and its Regulation corresponded to, before the “**Committee**” of **ROM REFACCIONES**, located at Poniente 134 No. 680-A, Industrial Vallejo, Azcapotzalco, zip code 02300, Mexico City or by sending an email to [arco.rom@gruporom.com](mailto:arco.rom@gruporom.com)

### **HANDLING, MANAGEMENT AND PROTECTION OF PERSONAL DATA**

It is responsibility of the “**Committee**”, the confidential management of the data base of the information related to the Personal Data of the Owners, with the purpose of regulate its legal, lawful, managed and informed treatment, which guarantee the privacy and protection of the property and moral rights of such holders.

### **TRANSFERS.**

**ROM REFACCIONES** could transfer the personal data to third parties pursuant to article 37 of “The Law”.

Therefore **ROM REFACCIONES**, could transfer the personal data without asking for consent to the following identities:

- i. The affiliate, subsidiary companies and related parties of **ROM REFACCIONES** or, when applicable, to any entity of the same group of **ROM REFACCIONES** which work under the same internal policies.
- ii. The competent authority in the case referred by the applicable Law.
- iii. Other transmission under the aforementioned Law and its Regulation.

Third parties and receiving identities of Personal Data assume the same obligations and/or responsibilities of **ROM REFACCIONES**, in accordance to this Notice of Privacy. **ROM REFACCIONES**, will grant that such third parties maintain administrative, technical and physical security measures needed to safeguard the Personal Data, as well as third parties use the Personal Data exclusively for the ending for which those were contracted and pursuant to this Notice of Privacy and to the Law and its Regulation.

### **ARCO RIGHTS AND/OR WITHDRAWAL OF CONSENT.**

The Owners could exercise their rights of Access, Rectification, Cancellation and/or Opposition (“ARCO” rights) pursuant to the Law. As a reference, hereunder, the rights of access, rectification, cancellation and opposition rights:

- I. **Access:** The Owner could ask to be informed of which are the personal data to be processed by **ROM REFACCIONES**, the origin of such data and communications which had been made with such.
- II. **Rectification:** The Owner could ask to be corrected or completed Personal Data which are incorrect or incomplete and that are processed by **ROM REFACCIONES**. The Owner have the obligation of informing to **ROM REFACCIONES**, whenever it is necessary to make a change or correction of the Personal Data and such act be of its own knowledge.
- III. **Cancellation:** The Owner could ask his/her data to be cancelled if those are still on the databases of **ROM REFACCIONES**. The cancellation process will be followed of a lock-out time through the storage of that data for a period of time, equivalent to the prescription of actions term which originated the personal data processing, or the time established by the Law.
- IV. **Opposition:** The Owner could oppose to the personal data process whenever there is a legal reason for such, even previously having expressed his/her consent for such treatment.

The Owner at any time could **revoke** the consent provided to **ROM REFACCIONES**, for the personal data treatment, to limit the use or disclosure of such, as well as to exercise the ARCO rights pursuant to the Law, by sending a request to the email: [arco.rom@gruporom.com](mailto:arco.rom@gruporom.com) through the “**Formato de Derechos ARCO**” file, the owner will describe the Personal Data referred and the ARCO right to be exercised.

In addition to this, the Owner, too, could exercise his/her Rights by sending a written request in which include full name, phone number, address or email address to receive notifications and a simple copy of the ID Card to Poniente 134 No. 680-A, Industrial Vallejo, Azcapotzalco, zip code 02300, Mexico City, to the Data Protection Committee.

If the provided information contained in the request is either insufficient or incorrect to be attended, or in case, the necessary or essential files are not attached for its attention, the Data Protection Committee could ask the Owner within a five-day-time, the information required to process such. The before set, the owner will count on a ten-business-day term after its reception in order to attend the request.

It is important to mention that, if the provided information by the Owner is enough, to emit a resolution will be a twenty-business-day term counted on the reception day of the request.

In accordance to what it is established in the Federal Law on the protection of personal data held by private individuals, the term before mentioned, could be expanded only one time for the same period of time, only if it is justified.

In the event that the request of the exercise of the ARCO rights results applicable and, the notification had been made it will be effective within a fifteen-business-day term, the before mentioned term, could be expanded only once for the same period of time, only if it is justified. The before mentioned, should be made of the Owner's consent through the means of contact previously established. It will be considered that **ROM REFACCIONES**, accomplished at the moment it delivers the correspondence to the post service, or in the date in which it answers the email.

#### **RESTRICTIONS IN THE USAGE OR DISCLOSURE OF PERSONAL DATA.**

Additionally, the Owner of the personal data could restrict the usage or disclosure of the personal data in accordance to the following:

- To register in the Public Registry Procuraduría Federal del Consumidor. For further information related to this option, you could directly contact the PROFECO or to access to the following link: <http://repep.profeco.gob.mx/> or making a phone call from Mexico, Guadalajara and Monterrey to 96 28 00 00 and from the rest of the Mexican Republic to 800 962 8000.
- To make a complaint through the following link: <http://repep.profeco.gob.mx/Denunciar.jsp>, by providing the data required.
- To ask for to **ROM REFACCIONES**, your register to the “Listado de Exclusión”, with the purpose of not receiving information related to our products or services. If applicable, the Owner will be registered in the Listado de Exclusión of **ROM REFACCIONES**.

#### **PROTECTION OF PERSONAL DATA**

In order to **ROM REFACCIONES** protect your Personal Data it counts on a privacy policy, training courses, limited access to personal data to authorized users, an inventory of Personal Data, listings of exclusions, risk analysis and contractual provisions that let the safeguard of Personal Data accomplish with the established security measures in the Law.

#### **VIDEOTAPING AREAS.**

**ROM REFACCIONES** could make video recording of common areas related to visitors to its facilities. The images and sounds collected by means of the usage of cameras of video surveillance will be used for the

Security Endings, as specified in the Notice of Privacy for video recording areas which could be checked in the video recording areas inside the facilities of **ROM REFACCIONES**.

### **USE OF COOKIES.**

To ensure that the web site is being well- managed and to facilitate a better browsing **ROM REFACCIONES** makes use of cookies. A cookie is a file downloaded in the user's device at the time of access to specific web pages in order to storage and recover information about the browsing made from such device. For additional information on how cookies are used by us and other follow-up technologies and the way they can be managed, you can check our Cookies Policy.

Cookies can be deactivated or disabled if you follow the internet browse procedures it uses.

### **CHANGES TO THE NOTICE OF PRIVACY**

**ROM REFACCIONES** reserves the right to modify this Notice of Privacy as convenient. The before mentioned, based on the changes of the Legislation or in the inhouse Policies or new requirements.

**ROM REFACCIONES** will inform you and make available the updated Notice of Privacy whenever relevant changes be made, through its web page <https://www.romrefacciones.com>, in the Notice of Privacy section, indicating the date of the last version of the Notice.

It is important to mention that, once the change is published, it will come into effect the next day after its publishing, through the pointed means of communications before mentioned.

### **DOUBTS AND COMPLAINTS.**

**ROM REFACCIONES** makes available for the Owner the email address [arco.rom@gruporom.com](mailto:arco.rom@gruporom.com) in order to contact in case there is either complaints or questions related to the services. Additionally, the Owner could pass their complaint or question on to the address of **ROM REFACCIONES**, located in Poniente 134 No. 680-A, Industrial Vallejo, Azcapotzalco, zip code 02300, Mexico City.

**ROM REFACCIONES** acknowledge that it is possible that the eb site <https://www.romrefacciones.com> can often fails, whenever this event occurs, you should send an email to the following email address: [arco.rom@gruporom.com](mailto:arco.rom@gruporom.com)

### **QUESTIONS OR COMMENTS.**

If any questions come up related to this Notice of Privacy, please contact **ROM REFACCIONES** by sending an email to: [arco.rom@gruporom.com](mailto:arco.rom@gruporom.com)

### **DENOUNCEMENT.**

If the Owner considers that his/her Right to the Personal Data Protection has been object of an improper or opposite treatment to pursuant provisions in the Federal Law on the protection of personal data held by private individuals and its Regulations, the Owner could lodge a complain before the Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI), for further information:

- Contact the Centro de Atención a la Sociedad (CAS) -free phone service- INAI pone 800 835 43 24. Business hours form: 09:00 to 18:00 hrs, from Monday to Thursday and on Friday from 09:00 to 15:00 hrs in the center of the country;
- The Owner, as well, can visiti to the address located in Insurgentes Sur No. 3211, Insurgentes Cuicuilco, Coyoacán, Zip.Code. 04530; or
- Search the link: <https://home.inai.org.mx/>

***Last update date in October 2020***