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INVESTOR PRIVACY NOTICE
(Valid from January, 2022)

This Privacy Notice is applicable to Personal Data provided by You by directly through any contact means between the Holder and the Responsible Party: by electronic, optical, sound, or visual means, or any other means or technology, as well as through any third party authorized by Quálitas Controladora, S.A.B. de C.V. (hereinafter, Quálitas Controladora).

• “Interested Parties” means: any individual providing his/her Personal Data, through any means for the purposes indicated in the applicable section.

1. IDENTITY AND ADDRESS OF THE RESPONSIBLE PARTY: Quálitas Controladora, S.A.B. de C.V., with address in Jose Maria Castorena 426 San Jose de los Cedros, C.P. 05200, Cuajimalpa de Morelos, Mexico City.

2. INFORMATION COLLECTED FROM THE HOLDERS (PERSONAL DATA SUBJECT TO PROCESSING): Quálitas Controladora hereby informs you that it may collect and will process your Personal Data regarding:

- Identification
- Contact
- Family Information
- Financial Data

In accordance with the general rule, the consent by the holder for the processing of personal data will be “tacit”, considering this Notice accepted when the same is made available through any means authorized by the law and the delivery of the personal data by the Holder.

In case of requesting financial data, Quálitas Controladora; whether by means of printed form or through the use of electronic means, will procure the “Express Consent” of the Holder for the processing of said data.

3. EXPRESS INDICATION OF THE SENSITIVE DATA THAT WILL BE PROCESSED: Quálitas Controladora will not process **sensitive data**.

4. PURPOSES FOR WHICH THE PERSONAL DATA COLLECTED WILL BE PROCESSED:

4.1. PRIMARY PURPOSES OF THE PROCESSING. – The personal data mentioned above will be processed for all purposes related to contact, communication, interaction and forwarding of public relevant information which Quálitas Controladora reports before the *Bolsa Mexicana de Valores* (Mexican Stock Exchange) and the investing public; whenever applicable, for purposes of fulfillment with the *Ley del Mercado de Valores* (Stock Exchange Law) and related stipulations.

4.2. SECONDARY PURPOSES OF THE PROCESSING.- Your personal data may be processed for the following secondary purposes: Communications for purposes of statistics; dissemination and invitation to programs and activities; and, in general, any activity aimed at promoting, maintaining, enhancing, and assessing the relationship that could exist with Quálitas Controladora.

In case you do not want your personal data to be used for any (or all) of these secondary purposes, you can oppose to the processing of your data for the secondary purposes through the means made available to you for the exercise of your ARCO rights in section 6.

5. DATA TRANSFERES:

5.1. By means of statutory order, the data referred to in this notice may be transferred to:

- Competent authorities for purposes of fulfilling the stipulations in the *Ley de Instituciones de Seguros y de Fianzas* (Insurance and Bonding Institutions Act).

- Mexican Judicial Authorities, for the purpose of complying with judicial notices, requirements, or official documents.
- Mexican Financial Authorities, for the purpose of complying with obligations resulting from laws or international treaties as insurance institution, tax obligations, as well as for the fulfillment of official notices or requirements.
- IMSS (Mexican Institute of Social Security), for purposes of the fulfillment of obligations included in the social security legislation.
- Institutions, organizations or entities of the insurance sector, corporations, or associations for purposes of preventing frauds, unlawful transactions, and risk selection.

In case we conduct any additional transfer requiring your express consent, this consent will be priorly obtained.

6. MECHANISMS FOR REQUESTING THE EXERCISE OF ARCO RIGHTS AND WITHDRAWAL OF CONSENT, AS WELL AS OPTIONS AND MEANS OFFERED BY QUÁLITAS FOR LIMITING THE USE OR RELEASE OF PERSONAL DATA:

You may request the Access, Rectification, Cancellation and Opposition to the processing of your Personal Data as well as limiting its use and withdrawal of consent, in writing at the address indicated in numeral I of this Notice or via E-mail to: smonroy@qualitas.com.mx and/or angonzalez@qualitas.com.mx and/or rleetoy@qualitas.com.mx

The personal data collected Will be protected by the appropriate administrative, technical, and physical security measures Against damage, loss, altering, destruction or the unauthorized use, access, or processing, in accordance with the stipulations in the LFPDP (by the acronym in Spanish for Federal Law on the Protection of Personal Data Held by Individuals) and other applicable legislation.

Besides the exercise of your Withdrawal or ARCO rights, you may limit the use or release of your personal data, by registering the same in the *Registro Público de Usuarios Personas Físicas (REUS)* (Public Registries of Individual Users).

7. COOKIES:

“Cookies” are data files stored in the hard drive of the computer equipment or electronic communication device of a user in a specific web site; which enable exchanging status information between said site and the user’s browser. The status information may disclose session identification, authentication means or user preferences, as well as any data stored by the browser related to the web site.

Due to the above, Quálitas Controladora hereby informs you that, at any time, you may disable the use of these mechanisms, in accordance with the instructions that the company owner of the browsers (browser of internet viewer) has implemented to activate and disable the aforementioned “Cookies”.

8. MEANS THROUGH WHICH THE PRIVACY NOTICE AND UPDATES ARE AVAILABLE TO YOU:

Quálitas Controladora may modify, at any time, this Privacy Notice, by publishing it in its web page www.qinversionistas.qualitas.com.mx, we therefore recommend you visit said web page periodically, or by means of communicating it to the Holder of the Personal Data, via electronic or any other means.

**COMPREHENSIVE PRIVACY NOTICE FOR MEMBERS OF THE BOARD,
STATUTORY TELLERS AND CONTROLLING BENEFICIAL OWNERS
(Valid from January, 2022)**

1. Quálitas Controladora, S.A.B. de C.V. and its present¹ and future subsidiaries (hereinafter, "**Grupo Quálitas**"), with address in Avenida San Jerónimo 478, Colonia Jardines del Pedregal, Alcaldía Álvaro Obregón, C.P. 01900, Mexico City, is responsible for the processing and protection of personal data provided by you physically or directly through any means of contact: physical, electronic, optical, sound, visual or any other means or technology; also, through any third party authorized by Grupo Quálitas.

The following will be considered holders:

- Members of the Board of Directors
- Statutory Tellers
- Controlling Beneficial Owners
- Spouse and/or common-law husband and/or common-law wife (if applicable).

INFORMATION COLLECTED FROM THE HOLDERS (PERSONAL DATA SUBJECT TO PROCESSING):

Grupo Quálitas hereby informs you that it may collect and process your Personal Data, which consist of:

I) IDENTIFICATION: Full name, alias, sex, date of birth and death, country of birth and nationality, marital status, Federal Taxpayer Registry, Unique Population Registry Code, type and number of official identification, employment and academic data, professional career and immigration data.

II) CONTACT DATA: Home and tax address, e-mail, landline and cell phone.

III) PATRIMONIAL OR FINANCIAL DATA: Data on compliance with tax, labor and social security status and obligations, financial statements, credit history, stock ownership, etc.

IV) SENSITIVE PERSONAL DATA:

1) Information to prevent conflicts of interest in the following cases:

- Kinship ties (blood or affinity) with shareholders, directors and officers of Grupo Quálitas, as well as with Politically Exposed Persons (i.e., individuals with prominent public functions).
- Shareholding or patrimonial and influence links in other companies.
- Pending litigation against the Mutual Institution or Society or entities that are members of Grupo Quálitas, legal situation regarding the declaration of no criminal record for patrimonial crimes or disqualification to engage in commerce, or to hold a job, position or commission in the public service or in the Mexican Financial System.

2) Advanced electronic signature.

By providing personal data related to your family members, you acknowledge that you have their consent for the data controller to process their data for the purposes set forth in this Notice and the applicable regulations

¹ Quálitas Compañía de Seguros, S.A. de C.V.
Quálitas Salud, S.A. de C.V.
Activos Jal, S.A. de C.V.
Logíflekk, S.A. de C.V.
Autos y Salvamentos, S.A. de C.V.
Optimización de Talento, S.A. de C.V.
Asistencia AVQ, S.A. de C.V.

2. PURPOSES FOR WHICH THE PERSONAL DATA COLLECTED WILL BE PROCESSED:

2.1. PRIMARY PURPOSES OF THE PROCESSING.

1. Prevent conflicts of interest.

2. To comply with the purposes related to the legal relationship we have with you, including: processing of fees, access to the physical and technological infrastructure of the responsible to fulfill its functions as advisor or commissioner, send you information to evaluate, allow audits.

3. To integrate the files required by the applicable regulations, and to comply with our obligations in stock exchange, insurance, tax, contractual and Corporate Governance matters.

The purpose of this Privacy Notice is to comply with the principle of information established in Article 15 of the Law² and 23 of its Regulations³; as well as to inform that the processing of the information collected will be done in accordance with the provisions of Article 10 section I of the Law, and therefore, the consent of the holder is not required for the information to be processed.

2.2 SECONDARY PURPOSES OF THE PROCESSING:

Your personal data Will not be processed for secondary purposes.

3. DATA TRANSFERS:

Grupo Quálitas may conduct transfers of personal data without requiring the consent of the Holder, whether domestic or international, in the cases provided for in Article 37 of the Federal Law for the Protection of Personal Data Held by Individuals (LFPDP, by its acronym in Spanish) or in any other case of exception provided for by the same or other applicable legislation.

In the event that we carry out any additional transfer that requires your express consent, the same shall be previously obtained.

4. MECHANISMS FOR REQUESTING THE EXERCISE OF ARCO RIGHTS AND WITHDRAWAL OF CONSENT, AS WELL AS OPTIONS AND MEANS OFFERED BY QUÁLITAS FOR LIMITING THE USE OR RELEASE OF PERSONAL DATA:

You may request the Access, Rectification, Cancellation and Opposition to the processing of your Personal Data as well as limiting its use and withdrawal of consent, in writing at the address indicated in numeral I of this Notice or via E-mail to datospersonales@qualitas.com.mx, in accordance with the stipulations to the Procedures which are available at the webpage <https://ginversionistas.qualitas.com.mx> in the section "Privacy Notice". In the Procedures at the end of said notice, you will find the means for response to the various requests, depending on the contents of the same.

5. COOKIES:

"Cookies" are data files stored in the hard drive of the computer equipment or electronic communication device of a user in a specific web site; which enable exchanging status information between said site and the user's browser. The status information may disclose session identification, authentication means or user preferences, as well as any data stored by the browser related to the web site.

Due to the above, Grupo Quálitas hereby informs you that, at any time, you may disable the use of these mechanisms, in accordance with the instructions that the company owner of the browsers (browser of internet viewer) has implemented to activate and disable the aforementioned "Cookies."

² Federal Law for the Protection of Personal Data Held by Individuals (*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*).

³ Regulations to the Federal Law for the Protection of Personal Data Held by Individuals (*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*).

6. INFORMATION ABOUT THE PERSONAL DATA AREA:

You may contact the DEPARTAMENTO DE DATOS PERSONALES (Personal Data Department) in order to solve any doubt or comment regarding your proceeding(s), through the following means:

- E-mail: datospersonales@qualitas.com.mx
- Free writing addressed to the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), with address in Avenida San Jerónimo 478, Colonia Jardines del Pedregal, Delegación Álvaro Obregón, C.P. 01900, Mexico City.
- Service Hours: 09:00 to 14:00 hours

7. VIDEO SURVEILLANCE AND PHOTOGRAPHY

Any person entering any of the facilities of Grupo Quálitas may be videotaped and/or photographed by our security cameras and records will be kept that may be used to safeguard the safety of visitors and personnel, with the purpose of remote monitoring in real time of the properties and thus mitigate any emerging risk condition, as well as to control access to our facilities.

8. MEANS THROUGH WHICH THE PRIVACY NOTICE AND ITS UPDATES ARE AVAILABLE TO YOU:

Grupo Quálitas may modify, at any time, this Privacy Notice, by publishing a notice in its web page <https://ginversionistas.qualitas.com.mx>, we therefore recommend you visit said web page periodically, or by means of communicating it directly to the Holder of the Personal Data, via electronic or any other means.

****We inform you that, for your security and that of third parties from whom we may collect information through you, the use and processing of the same will be in the same terms established in this Privacy Notice and in no way will be given a different protection than that of the data provided here. It is also important that you keep in mind that such data will not be transferred to any third party other than those set forth herein..***



I ACCEPT, NAME AND SIGNATURE

Latest Update, January 2022

APPENDIX 1: PROCEDURE – EXERCISE OF ARCO RIGHTS

I REQUEST:

THE PERSONAL DATA SUBJECT MAY REQUEST THE EXERCISE OF HIS/HER RIGHTS IN THE FOLLOWING WAYS:

- A) In writing:
 - Submit the request for the exercise of ARCO Rights to the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), located at Avenida San Jerónimo 478, Col. Jardines del Pedregal, Alcaldía Álvaro Obregón, C.P. 01900, in Mexico City.
 - The Data Subject must show his/her official identification and a legible copy of it or; deliver a copy of the same certified before a public attestor.
- B) Electronic Mail:
 - Must send the request for the exercise of ARCO Rights to the e-mail datospersonales@qualitas.com.mx.
 - Must include the FIRMA ELECTRÓNICA AVANZADA (*Advanced Electronic Signature*) in the e-mail for identification purposes.
- *Official Identification: Term established by the General Population Law and its Regulations.

REQUEST SUBMITTED THROUGH THE REPRESENTATIVE OF THE DATA SUBJECT

In case the Data Subject desires to exercise any of his/her ARCO Rights through a representative, he/she may do so in accordance with any of the following ways:

- The representative of the Data Subject must exhibit the public instrument or power of attorney signed before two witnesses, in which he/she is recognized as such, which must contain sufficient authorities for representing him/her.
- *It is required that the attorney-in-fact exhibits his/her official identification and a simple copy of it or a copy of the same certified before a public attestor.
- * In case the public instrument or power of attorney does not include a certified copy of the official identification of the principal, it will be necessary for the attorney-in-fact to exhibit it together with the request.
- The Data Subject must appear with his/her representative to declare the appointment of the latter and the powers he/she wishes to grant him/her.
- * In this case, both the Data Subject and its representative must appear with their official identification and a simple copy or a certified copy of the same.

If the Data Subject or his/her attorney-in-fact does not comply with the identification schemes set forth in this policy, or if the information provided in the corresponding request is insufficient or erroneous making it impossible to service said request, the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) may request compliance with the aforementioned schemes or, a complete or correct request, only once within 5 (FIVE) business days following the receipt of the request; in order for the Data Subject to submit any of the above within 10 (TEN) business days from the day following the receipt of such request. If no response is given within such term, the respective request shall be deemed not submitted.

Regarding the exercise of the Right of Rectification of Personal Data, the Data Subject must indicate, in the corresponding request, the modifications or corrections of his/her Personal Data and; for this purpose, he/she must provide sufficient documentation to support his/her request. The DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) may request, only once within 5 (FIVE) business days following the receipt of the request, any missing documents, in order for the Data Subject to submit the same within 10

(TEN) business days as of the day following the day in which such request is received. If no response is provided within such term, the respective request shall be deemed not submitted.

CHANNEL FOR RECEIVING RESPONSE TO YOUR REQUEST

In the request for the exercise of ARCO rights, the Data Subject must indicate the channel through which he/she prefers to receive a response:

- Electronic Mail.
- Certified Mail.
- By means of a visit to the office where the exercise of ARCO rights was requested. In the event that the Data Subject has chosen this option as the response means, the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) will indicate, in the response notifying the Data Subject about the admissibility of its request; the date (which may not exceed 15 working days from the date of notification of the response of admissibility, in case the Data Subject does not appear on the established date it will be necessary to submit a new request), address, preferential schedule and name of the person who will attend the visit. **This channel is valid only to enforce the Right of Access to Personal Data.*
- *Due to the fact that there are 2 stages in the exercise of ARCO rights: the first, "Admissibility or Inadmissibility of the request for the exercise of ARCO Rights"; and the second, "Enforceability of the exercise of ARCO Rights", (in case of admissibility) the Data Subject must indicate the response channels for each of the mentioned stages.

II. RESPONSE REGARDING THE ADMISSIBILITY OR INADMISSIBILITY OF THE REQUEST FOR THE EXERCISE OF ARCO RIGHTS:

The Controller, through the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), will process the request for the exercise of ARCO rights. The maximum term to determine whether your request is admissible or not is 20 (twenty) business days from the day on which it has been received by the Controller. The response on whether or not the request is admissible or inadmissible will be made through the channels which the Data Subject has established in his/her request, in accordance with the provisions of this policy.

III. RESPONSE REGARDING THE ENFORCEABILITY OF THE EXERCISE OF ARCO RIGHTS:

Once the admissibility of the request for the exercise of ARCO Rights has been notified, the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) will enforce all things intended in such request, in accordance with the channel chosen by the Data Subject, which shall be provided for in this document. The DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) shall have a term of 15 (FIFTEEN) business days to comply with the provisions of this paragraph.

IV. CONTACT:

To solve any doubts or comments regarding your ARCO Rights exercise procedure, you may contact us through the following means:

- Electronic Mail: datospersonales@qualitas.com.mx.
- Written document addressed to the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), with address in Avenida San Jerónimo 478, Col. Jardines del Pedregal, Alcaldía Álvaro Obregón, C.P. 01900, in Mexico City.
- Service hours from 9:00 am to 2:00 pm.

APPENDIX 2: PROCEDURE – REVOCATION OF CONSENT

I REQUEST:

THE PERSONAL DATA SUBJECT MAY REQUEST THE REVOCATION OF HIS/HER CONSENT IN THE FOLLOWING WAYS:

- A) In writing:
 - Submit the request for the revocation of consent to the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), located at Avenida San Jerónimo 478, Col. Jardines del Pedregal, Alcaldía Álvaro Obregón, C.P. 01900, in Mexico City.
 - He / She must show his/her official identification and a legible copy of it or; deliver a copy of the same certified before a public attestor.
- B) Electronic Mail:
 - Must send the request for revocation of consent to the e-mail datospersonales@qualitas.com.mx.
 - Must include the FIRMA ELECTRÓNICA AVANZADA (*Advanced Electronic Signature*) in the e-mail for identification purposes.
- *Official Identification: Term established by the General Population Law and its Regulations.

REQUEST SUBMITTED THROUGH THE REPRESENTATIVE OF THE DATA SUBJECT

In case the Data Subject submits this request for revocation of consent through a representative, he/she may do so in accordance with any of the following ways:

- The representative of the Data Subject must exhibit the public instrument or power of attorney signed before two witnesses, in which he/she is recognized as such, which must contain sufficient authorities for representing him/her.
- *It is required that the attorney-in-fact exhibits his/her official identification and a simple copy of it or a copy of the same certified before a public attestor.
- * In case the public instrument or power of attorney does not include a certified copy of the official identification of the principal, it will be necessary for the attorney-in-fact to exhibit it together with the request.
- The Data Subject must appear with his/her representative to declare the appointment of the latter and the powers he/she wishes to grant him/her.
- * In this case, both the Data Subject and its representative must appear with their official identification and a simple copy or a certified copy of the same.

If the Data Subject or his/her attorney-in-fact does not comply with the identification schemes set forth in this policy, or if the information provided in the corresponding request is insufficient or erroneous making it impossible to service said request, the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) may request compliance with the aforementioned schemes or, a complete or correct request, only once within 5 (FIVE) business days following the receipt of the request; in order for the Data Subject to submit any of the above within 10 (TEN) business days from the day following the receipt of such request. If no response is given within such term, the respective request shall be deemed not submitted.

CHANNEL FOR RECEIVING RESPONSE TO YOUR REQUEST

In the request for the revocation of consent, the Data Subject must indicate the channel through which he/she prefers to receive a response:

- Electronic Mail.
- Certified Mail.
- *Due to the fact that there are 2 stages in the revocation of consent: the first, "Admissibility or Inadmissibility of the request for Revocation of Consent"; and the second, "Enforceability of the Revocation of Consent", (in case of admissibility) the Data Subject must indicate the response channels for each of the mentioned stages.

II. RESPONSE REGARDING THE ADMISSIBILITY OR INADMISSIBILITY OF THE REVOCATION OF CONSENT:

The Controller, through the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), will process the request for revocation of consent. The maximum term to determine whether your request is admissible or not is 20 (twenty) business days from the day on which it has been received by the Controller.

The response on whether or not the request is admissible or inadmissible will be made through the channels which the Data Subject has established in his/her request, in accordance with the provisions of this policy.

III. RESPONSE REGARDING THE ENFORCEABILITY OF THE REVOCATION OF CONSENT:

Once the admissibility of the request for revocation of consent has been notified, the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) will enforce it, in accordance with the channel chosen by the Data Subject, which shall be provided for in this document. The DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*) shall have a term of 15 (FIFTEEN) business days to comply with the provisions of this paragraph and will notify the Data Subject regarding the effects of his/her revocation of consent..

IV. CONTACT:

To solve any doubts or comments regarding your revocation of consent procedure, you may contact us through the following means:

- Electronic Mail: datospersonales@qualitas.com.mx.
- Written document addressed to the DEPARTAMENTO DE DATOS PERSONALES (*Personal Data Department*), with address in Avenida San Jerónimo 478, Col. Jardines del Pedregal, Alcaldía Álvaro Obregón, C.P. 01900, in Mexico City.
- Service hours from 9:00 am to 2:00 pm.