

ASSEMBLA

PRIVACY NOTICE

I. Identity of Assembla Law, S.C.

Assembla Law, S.C. (the "Firm"), located at Prolongación Paseo de la Reforma 1196, 15th Floor, Lomas de Santa Fe, Cuajimalpa, Zip Code 05300, Mexico City, is responsible for the collection, use and protection of your personal data in accordance with the Federal Law for the Protection of Personal Data in the Possession of Private Parties (the "Law"), as well as its Regulations and Guidelines (hereinafter and collectively with the Law referred to as the "Personal Data Legislation"). Therefore we inform you of the following:

The Firm is a law firm that offers various services related to legal advice across multiple areas of law, hereinafter referred to as the "Services". In order to provide, quote and deliver these Services, the Firm requires to collect and transfer personal data, including sensitive personal data, as well as financial or economic data. This data collection is necessary for evaluating legal contingencies, drafting documents related to client operations, engaging third-party services such as notaries public, obtaining official documentation from various governmental institutions at municipal, local and federal levels, coordinating with third parties involved in clients transactions, conducting legal due diligence over assets or individuals, and planning, executing and monitoring the necessary processes and procedures on behalf of its clients in connection with the Services provided by the Firm.

One of the Firm's top priorities is a commitment to privacy and safeguarding the processing of personal data gathered from its clients. As such, the Firm provides this Privacy Notice (the "Privacy Notice") as a commitment to regulate the handling of their personal data, encompassing its collection, utilization, disclosure, or storage, through any means, to ensure their privacy and right to informational self-determination. In line with this commitment, the Firm will undertake the necessary and adequate measures, as per the Law, to ensure compliance with this Privacy Notice, either by the Firm directly or by third parties with whom it maintains a legal relationship.

II. Obtainment of personal data.

The Firm obtains personal data, which is treated in accordance with this Privacy Notice, in the following ways: (i) when the Holder provides it to us directly by any means; (ii) when they visit our website; and (iii) when we obtain information through other sources that are permitted by law.

The personal data that we obtain by various means may include, but is not limited to: (i) full name; (ii) personal or office telephone number; (iii) email address; (iv) official identification; (v) occupation; (vi) date of birth; (vii) nationality; (viii) Federal Taxpayers Registry (RFC); (ix) tax and/or financial information; (x) tax domicile; (xi) social security number; (xii) Unique Population Registry Code (CURP); and (xiii) any information that in each particular case the Firm deems appropriate or requires in general for the provision of services, advertising purposes and/or any other related activities.

Please be informed that we use Cookies and Web Beacons to obtain personal information, which may include the following: (i) your browser type and operating system; (ii) the websites you visit; (iii) the links you follow; (iv) the IP address; and/or (v) the site you visited before entering our site. These cookies and other technologies can be disabled, to learn how to do so, please send us an email to the following address: contact@assembla.law

Additionally, the personal data collected through other means permitted by Law include business cards, either physical or electronic, that are turned in or sent to us by the Holders themselves, or the information that such Holders provide us when they contact us by phone or by email.

III. Sensitive personal data.

Assembla
Prolongación Paseo de la Reforma 1196, Piso 15
Lomas de Santa Fe
Cuajimalpa
05300, Ciudad de México

contact@assembla.law

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The Firm hereby notifies you that, with the purpose of fulfilling certain objectives outlined in this Privacy Notice, sensitive personal and patrimonial data will be collected. This may include information regarding racial or ethnic origin, current or future health status, genetic information, religious, philosophical and moral beliefs, syndical affiliation, political opinions, sexual preferences, nationality, marital status, financial capacity, economical solvency and, if married, patrimony regime, as well as information related with certain assets or resources that might be involved in the operations that you pretend to perform. Likewise, the Firm reaffirms its commitment with the Holders of such personal sensitive and patrimonial data in this regard. These data shall be managed under safety measures that guarantee its confidentiality.

The Firm does not collect or process sensitive personal data in the ordinary course of business. If sensitive personal data is collected and processed, such data will be collected, maintained and processed with strict security and confidentiality for purposes related to the provision of services in accordance with this Privacy Notice and in compliance with the provisions of the Federal Law for the Protection of Personal Data in the Possession of Private Parties.

IV. Purposes.

The information that the Firm collects from the Holders, either prospects or clients, shall be used for the following commercial legitimate purposes:

- 1.- To provide the information related to the Services requested or contracted by the Holders;
- 2.- To evaluate and analyze the information received for the provision of Services specialized by the Firm;
- 3.- To understand the profile of the Holders in their capacity as clients or prospects of the Firm;
- 4.- To adhere to the legal relationship assumed with the Holders or other clients, even after termination, and for the statute of limitations periods for the causes of action that might derive from such relations in accordance with Law;
- 5.- To inform the Holder about any amendments, supplements or extensions in the Services, either contracted by the Holder or those which, at the discretion of the Firm, could be of the interest of the Holder;
- 6.- For internal purposes, such as to evaluate the quality of the Services we provide to the Holder or to perform internal surveys, such as statistical information, actuarial, consumer profile and consumption habits; as well as to compare the information received with similar cases in which the Firm participates at any moment;
- 7.- To take advantage of and enrich the infrastructure of the Firm at the local and international levels, as well as the supervision and monitoring of the performance of different clients and alliances with other law firms of the Firm (both at local and international level); reflect the information of the Holder in the Services that the Firm prepares for her as well as for advertising and promotional purposes at the Firm's Internet webpage and the various materials and media that we produce and update from time to time for such purposes;
- 8.- Notify immediately to the Holders in the event of a security violation occurring in the database that significantly affects their patrimonial or moral rights. If any security violation exists in the safety measures implemented to protect the personal data, the Firm shall give immediate notice through its email to the Holders;
- 9.- Fulfil any obligations (whether administrative, regulatory or normative) that the Firm, the Services or the Holders are required to comply before any competent authority, including but not limited to the Federal Law for the Prevention and Identification of Transactions with Illicit Source Resources (Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita) its Regulations and General Character Rules referenced by such law; and
- 10.- Communicate the Holders the changes that, as the case may be, the Firm makes to this Privacy Notice.

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V. Consent.

The Holder grants the Firm its consent so that the information provided to the Firm may be processed in accordance with this Privacy Notice and the applicable legal provisions. Likewise, the Holder grants the Firm the right to obtain, use (use may include any action of access, handling, use, transfer or disposal of the personal data), disclose or store its personal data by the means that the Firm deems appropriate, for as long as necessary, subject to the limits established by law, in order to meet the purposes set forth in this Privacy Notice and to comply with the legal provisions applicable to the Firm or the Holders themselves are subject to.

VI. Transfers of personal data.

By means of this Privacy Notice, the Firm informs the Holders that their personal data may be transferred and processed inside and outside the country, to people other than the Firm. Such transfers may be made to people who are not related parties of the Firm, as well as law firms and other service providers in different parts of the world for the purpose of sharing relevant information in accordance with the purposes set forth in this Privacy Notice, which will be informed about the limitations and purposes of this Privacy Notice.

Notwithstanding the provisions of this clause or any other clause of this Privacy Notice, the Holder acknowledges and accepts that the Firm does not require authorization or confirmation from such Holder to transfer personal data nationally or internationally in the cases provided for in Article 37 of the Law or in any other case of exception provided for in such Law, its Regulations or the Guidelines. In turn, the Firm will transfer personal data when requested by governmental authorities by means of a duly grounded and motivated requirement, or by any court order issued by any competent judicial authority.

If, in your capacity as Holder, you do not express your opposition to the transfer of your personal data, it will be understood that from this moment you authorize it and that you have also given your consent to do so.

VII. Principles.

The Firm undertakes to implement the necessary measures to ensure that the processing of personal data is carried out in accordance with the principles of legality, consent, information, quality, purpose, loyalty, proportionality and responsibility established by the Law. Likewise, the Firm undertakes to keep the personal data contained in its databases accurate, in such a way that they are pertinent, correct and updated for the purposes for which they were collected, and to process them in the manner that is necessary, adequate and relevant in relation to the purposes set forth herein and in accordance with the terms of this Privacy Notice.

The period of time that the Firm will keep the collected personal data will be the necessary to comply with the purposes of this Privacy Notice and the obligations that the Firm has contracted with the Holders of such personal data.

VIII. Security measures.

The Firm maintains and shall adopt the safety, administrative, physical and technical measures, actions, procedures and mechanisms that privilege the Holder's interests, and which guarantee the due treatment and protection of the personal data that it collects, in the same way, it guards its own.

IX. Exclusion lists.

If you no longer want to receive advertising emails or postal mail from the Firm, you can request it in the "Unsubscribe" section of our website, or request it through the following email: contact@assembla.law

X. Exercise of the rights of Access, Rectification, Cancellation, Opposition (hereinafter "ARCO Rights") to the processing of the Holder's personal data.

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The Firm informs you that it is your right to request the correction of your personal information in case it is outdated, inaccurate or incomplete (Rectification); that we remove it from our records or databases when you consider that it is not being used in accordance with the principles, duties and obligations set forth in the regulations (Cancellation); as well as to oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO rights.

To exercise any of the ARCO rights, you must do so through the procedure described below:

1. The ARCO Rights must be exercised by the Holder or his/her representative, in accordance with the following:
 - a. The Holder must verify his identity, by presenting a copy of his identification document, and showing the original for comparison.
 - b. By the representative of the Holder, upon providing:
 - i. Verification of the Holder's identity;
 - ii. Verification of the representative's identity; and
 - iii. Confirmation of the representative's authority, either through a notarized document or power of attorney signed in the presence of two witnesses, or a declaration made by the Holder in person.
2. The Holder or his/her representative shall submit a request, by means of a document, addressed to the person responsible for personal data of the Firm, at its offices located at Prolongación Paseo de la Reforma 1196, 15th Floor, Lomas de Santa Fe, Cuajimalpa, Zip Code 05300, Mexico City, which shall contain the following data:
 - a. Name of the Holder, address, telephone number or email address, so that the person in charge of personal data at the Firm can provide a response.
 - b. A clear and precise description of the personal data with respect to which the Holder seeks to exercise any right.
 - c. Any element or document that facilitates the location of personal data in our databases.
 - d. In the case of requests for rectification of personal data, the Holder must also indicate the modifications he/she intends to carry out and provide the documentation supporting his/her request.
3. The Firm will communicate to the Holder the decision it adopts within a maximum period of 20 (twenty) days from the date on which the request was received.
4. If the determination mentioned in the previous point is appropriate, the Firm shall make it effective within 15 (fifteen) days from the date on which it communicates the response to the Holder.
5. The Firm may deny access, rectification, or cancellation of personal data, or oppose the processing thereof in the cases indicated in article 34 of the Law, which in its relevant part states:

"(...) The data controller may deny access to personal data, or to carry out the rectification or cancellation or grant opposition to the processing thereof, in the following cases:

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- I. When the applicant is not the holder of the personal data, or the legal representative is not duly accredited to do so;
- II. When the applicant's personal data is not found in its database;
- III. When the rights of a third party are harmed;
- IV. When there is a legal impediment, or the resolution of a competent authority, which restricts access to personal data, or does not allow the rectification, cancellation or opposition thereof, and;
- V. When the rectification, cancellation or opposition has been previously made (...)"

The Firm designates Ana Canales McGregor as the Controller of personal data, who can be reached at the address mentioned above and via email contact@assembla.law.

XI. Modifications to the Privacy Notice.

The Firm reserves the right to modify or update this Privacy Notice at any time to comply with new legislation, internal policies, new service offerings, or other reasons. These modifications will be made publicly available through the www.assembla.law website in the "Legal Notices" and/or "Privacy Notice" section, or if applicable, will be sent to the last email address provided by the Holder.

Last update: March 1st, 2024.