



## Comprehensive Privacy Notice — Grupo-GST

Responsible party: Grupo Gruest Sánchez de Tagle, S.A. de C.V. ("Grupo-GST")

Address: Sierra Fría 401, Bosques del Prado, Aguascalientes, C.P. 20127

Tel. & WhatsApp: +52 4494009932

Privacy Email: [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com)

### 📍 Applicable Framework

- ◆ This Notice is issued in compliance with the *Federal Law on Protection of Personal Data Held by Private Parties* (LFPDPPP), its Regulations, and the Guidelines on privacy notices.
- ◆ When Grupo-GST interacts with public entities ("sujetos obligados"), the provisions of the applicable personal data legislation will be observed.

### 🏢 1) Identity and Address of the Controller

Controller: Grupo-GST is the entity that decides on the processing of your personal data.

📍 Address for receiving notices and communications:  
Sierra Fría 401, Bosques del Prado, Aguascalientes, C.P. 20127.

✉️ Contact for the Personal Data Department:  
[privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com) | +52 4494009932.

### 📝 2) Personal Data We May Collect

#### 👤 Identification and contact data:

Full name, address, landline/mobile/WhatsApp numbers, email address, RFC (Tax ID).

#### 💼 Commercial relationship:

Purchase/service history, billing data, terms and commercial references.

#### 💳 What we do **not** collect:

We do not request or process full credit/debit card numbers, CVV, PIN, or other confidential banking data; any charges are, where applicable, made through authorized institutions and platforms.

#### 🔒 Sensitive data:

As a general rule, we do not collect sensitive personal data. If, in a specific case, it becomes necessary (e.g., certificates or documents containing sensitive information required to access certain facilities), you will be informed and your express, written consent will be requested.



### ⌚ 3) Purposes of the Processing

#### ⌚ Primary purposes (necessary):

- To provide the products and/or services you request.
- To manage registrations, orders, deliveries, warranties, support, and post-sale service.
- To invoice, collect (through authorized third parties), and comply with contractual and legal obligations.
- To handle requests, inquiries, and customer service.
- To assess quality and satisfaction, as well as to carry out anti-fraud and security controls.

#### ✨ Secondary purposes (optional):

- To send commercial information about products, services, promotions, or events.
- To perform statistical analyses, internal studies, and surveys for continuous improvement.
- To create basic commercial profiles in order to recommend solutions aligned with your interests.

ⓧ If you do not want your data to be used for secondary purposes (marketing, advertising, and commercial prospecting), you may request your registration in Grupo-GST's "**Advertising Exclusion List**" by writing to: [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com).

### 🤖 4) Automated Processing, Profiling and Use of AI

- We may apply analytical models and AI (machine learning algorithms) for: commercial segmentation, product/service recommendations, fraud prevention, enhanced support, and operational efficiency.
- Where possible, we use pseudonymization and/or anonymization to minimize direct identification.
- We do not make decisions based solely on automated processing that produce legal effects or significantly affect you in a similar way without human involvement.
- You may object to the use of your data for profiling for marketing purposes, or request a human review of any relevant automated evaluation, by writing to: [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com).



## 🍪 5) Cookies, Web Beacons and Similar Technologies

- 🌐 On Grupo-GST's websites and subdomains, and those of its Divisions, we use cookies and related technologies to: remember preferences, keep sessions active, analyze content usage, improve features, measure performance, and personalize communications.
- ⚙️ Types of cookies: essential (site operation), performance/analytics, and personalization.
- 👍 By browsing our sites, you accept the use of these technologies. You can disable them in your browser settings; however, some features may be limited.
- 🚫 We do not use cookie "centers" or "banners" for consent management; your choices are exercised directly in your browser or through the opt-out/objection mechanisms described in this Notice.

## ⚖️ 6) Legal Bases for Processing

- 📄 Consent of the data subject (express, tacit, or written, as applicable).
- 🤝 Performance of a contract or pre-contract to which you are a party.
- 📚 Compliance with legal obligations (tax, security, responding to authorities, etc.).
- .Security and fraud prevention.
- 🔧 Support and improvement of services and operations, under principles of proportionality, quality, fairness, and accountability.

## 🔄 7) Data Transfers and Disclosures

- 📦 **Disclosures to Processors (service providers):**  
Hosting, messaging, support, call center, transactional email, analytics, and cybersecurity services, with confidentiality agreements and appropriate security measures.
- 🌐 **Transfers (third parties):**  
We may share strictly necessary data with: competent authorities; auditors; legal advisors; affiliates or commercial partners solely for purposes compatible with this Notice.
- 📄 **Without consent:**  
In the cases permitted by law (e.g., authority requests; compliance with legal obligations; emergencies that may potentially harm an individual; recognition, exercise, or defense of rights).
- ✉️ If other transfers arise that *do* require your consent, we will request it in advance, indicating the purposes and recipients.



## 8) Security Measures

- **Administrative:** Internal policies, access controls on a need-to-know basis, training, and confidentiality agreements.
- **Technical:** Encryption in transit and/or at rest where applicable, network segmentation, access logs, security testing, backup, and recovery.
- **Physical:** Access controls to facilities, safekeeping of files and storage media.

## 9) Data Retention

- We keep your data only for the time necessary to fulfill the purposes informed and to comply with legal/contractual obligations.
- As a reference, for contractual relationships we keep information for the duration of the relationship and, afterwards, for a reasonable period (e.g., up to 5 years) to meet legal obligations, warranties, defense of rights, and audits.
- Once these periods expire, the data are securely deleted or anonymized.

## 10) Means to Limit the Use or Disclosure of Your Data

- Request your registration in the **Advertising Exclusion List** by writing to [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com) in order to stop receiving advertising, marketing, or commercial prospecting communications.
- You can choose not to receive promotional messages using the unsubscribe links (where applicable) or by emailing the privacy contact.

## 11) ARCO Rights and Withdrawal of Consent

### ARCO Rights:

Access, Rectification, Cancellation, and Opposition to the processing of your personal data. You may also withdraw your consent.

### How to exercise them:

1. Send an email to [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com) including:
  - The identity of the data subject (full name, preferred contact method, and a copy of an official ID or, where applicable, proof of power of attorney/representation).
  - A clear description of the right you wish to exercise and the data involved.
  - Supporting documents, where applicable (e.g., correct data for rectification).



## 2. Response times:

- ⌚ We will inform you of our determination within a maximum of 20 business days from receipt of your complete request.
  - If your request is granted, implementation will take place within the following 15 business days.

- ✉️ We will notify you via the means you indicate (email, unless you specify otherwise).

## 💡 Withdrawal of consent:

You may withdraw your consent at any time, without retroactive effect. Please note that, due to legal or contractual obligations, we may be required to keep certain data for additional periods.

## 👶 12) Minors and Individuals with Limited Legal Capacity

- We do not knowingly process data of minors without authorization from their mother, father, or legal guardian. If we believe we have collected data without such authorization, we will delete it upon request.

## 📍 13) Complaints or Claims

- If you believe your right to personal data protection has been violated by Grupo-GST's actions or you suspect any breach of the applicable regulations, you may first contact us at: [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com).
- You also have the right to approach Mexico's data protection authority (INAI) in accordance with the legal timelines and requirements.

## 🔄 14) Changes to this Privacy Notice

- 🖌️ Grupo-GST may modify or update this Notice to reflect legislative, internal, or service-related changes.
- 🌐 The current version will be available on our websites and subdomains of Grupo-GST and its Divisions. If any change requires new consent, we will request it using your registered contact details.

## ✉️ 15) Contact Details of the Personal Data Department

- 🌐 Name: Personal Data Department — Grupo-GST
- ☎️ Tel. & WhatsApp: +52 4494009932
- ✉️ Email: [privacidad@mail.grupo-gst.com](mailto:privacidad@mail.grupo-gst.com)

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