

PRIVACY NOTICE

Pursuant to what is set forth in the Federal Law for the Protection of Data Held By Private Companies or Individuals (hereinafter referred to as "the Law"), we would like to inform the following:

1.- INDIVIDUAL OR ENTITY IN CHARGE OF THE PERSONAL DATA

Protección Dinámica Agente de Seguros y de Fianzas S.A. de C.V., (hereinafter referred to as the Corporation), having as its address for the purposes of this Privacy Notice that located at Avenue Periférico Sur number 5452, Olímpica, Coyoacán, Mexico City, Zip Code 04710, Mexico, will be the entity in charge of the Personal Data and/or Sensitive Personal Data to be provided to the same by the relevant individuals (hereinafter interchangeably referred to as the Data Subject or Data Subjects).

2.- PERSONAL DATA REQUIRED FROM DATA SUBJECTS

For the purposes referred to in this Privacy Notice, the Corporation may collect the Personal Data from the Data Subjects provided or interested in being provided with any services, goods, or products rendered by the Corporation, such as their names (official ID (including photograph) and, in case of foreigners, their migratory documents in force), the image from the Data Subject when entering into the Corporation facilities captured through security and video-surveillance cameras, the citizenship, address (both private and business addresses), telephone numbers (both home and work telephone numbers), mobile telephone number, electronic mail, date of birth, Federal Taxpayers' Registry (RFC, in Spanish), Individual Population Registration Code (CURP, in Spanish), occupation or professional activity, information on assets (updated financial statements and, if applicable, audited financial statements, monthly income, list of owned property), and bank account information, as well as Sensitive Personal Data¹ concerning personal habits and detailed health information.

Furthermore, Data Subjects interested in being provided with any services, goods, or products rendered by the Corporation and who have been entrusted with or are currently entrusted with prominent public functions in the national territory or abroad (PPE)² are also required to provide the information concerning the public functions they were or are in charge of and for how long. Due to its character, such information is handled by the Corporation as Sensitive Personal Data.

¹ Article 3, Paragraph VI, of the Federal Law for the Protection of Data Held By Private Companies or Individuals establishes that Sensitive Personal Data are those affecting the most private sphere of the Data Subject or whose misuse can lead to discrimination or involves a serious risk to the same. Particularly sensitive are considered those that can reveal aspects such as racial or ethnic origin, current or future health status, genetic information, religious, philosophical and moral beliefs, union membership, political opinions, sexual preferences.

² Politically Exposed Persons (PPE, in Spanish): Those individuals who are entrusted with or have been entrusted with prominent public functions in the national territory or abroad, including without limitation, heads of state or government, political leaders, government officers, law enforcement officers, or high-ranking military officers, senior executives from state enterprises, or major officers or members of political parties. The term PPE comprises the spouse, concubine, and relatives by blood or marriage to the second degree, as well as the entities with which the PPEs have business links.

On the other hand, individuals acting as Beneficiaries with respect to any goods, products, or services provided to the Data Subject by the Corporation are hereby notified that the latter only requires their Personal Data concerning full name, the image from the Data Subject when entering into the Corporation facilities captured through security and video-surveillance cameras, telephone numbers (both home and work telephone numbers), mobile telephone number, address, date of birth, and kinship with the Data Subject being provided with such goods, products, or services by the Corporation. The Beneficiaries are also Data Subjects of such Personal Data pursuant to this Privacy Notice and they are not required at all to provide Sensitive Personal Data.

Spouses of Data Subjects interested in being provided with any goods, products, or services rendered by the Corporation and who have not been entrusted with or are not currently entrusted with prominent public functions in the national territory or abroad are notified that the Corporation requires only the following personal data from them: Name (official ID), the image from the Data Subject when entering into the Corporation facilities captured through security and video-surveillance cameras, and marital status (copy of marriage certificate and, in case of being married by marital property regime, they shall also be required to submit their asset information). Spouses own these Personal Data pursuant to this Privacy Notice and they are not required at all to provide Sensitive Personal Data.

Relatives (including Spouses) of Data Subjects interested in any goods, products, or services rendered by the Corporation and who have previously been entrusted with or are currently entrusted with prominent public functions in the national territory or abroad are notified that the Corporation requires the following personal data from them: Full name, the image from the Data Subject when entering into the Corporation facilities captured through security and video-surveillance cameras, citizenship, Federal Taxpayers' Registry (RFC), country of residence, and kinship with the Data Subject interested in being provided with the Corporation Services (as such term in hereinafter referred to), as well as their Sensitive Personal Data concerning the public function the are or were in charge of and for how long. These Personal Data and Sensitive Personal Data are owned by the former pursuant to this Privacy Notice.

Data Subjects interested in being provided with any goods, products, or services rendered by the Corporation and who provide the latter with Personal Data and/or Sensitive Personal Data from Data Subjects acting as Beneficiaries, Spouses, and/or with respect to their relatives and who have been entrusted with or are currently entrusted with prominent public functions in the national territory or abroad shall notify the latter that their Personal Data and/or Sensitive Personal Data have been provided to the Corporation, as well as of the contents of this Privacy Notice, the foregoing regardless of the notice provided by the Corporation to such Data Subjects about the Privacy Notice when first making contact with the latter.

In accordance with Article 14 of the Law Regulations, if the Corporation should not let Data Subjects know this Privacy Notice in a direct or personal manner but in an indirect manner, Data Subjects will have 5 (five) business days after the Privacy Notice was made available for them to express views opposed to the fact that their Personal Data and/or Sensitive Personal Data are intended to be used by the Corporation for purposes not required to comply with the legal relationship with the same. They shall express such an opposition according to what is set forth in section five (5) of this Privacy Notice and, if Data Subjects should not express their opposition, it will be understood that they grant their consent to the Corporation.

Personal Data and/or Sensitive Personal from Data Subjects may be collected in any of the following manners: i) when the Data Subject personally or directly provides them; ii) when the Corporation indirectly obtains them; and/or iii) when such data are obtained by the Corporation through sources allowed by the legislation.

Data Subjects shall ensure that the Personal Data and/or Sensitive Personal Data personally or directly provided to the Corporation by the former are full and accurate. The former shall also provide the Corporation with notice of any modifications of the same in order to comply with the obligation of keeping the information updated.

3.- REASONS TO COLLECT PERSONAL DATA

Information on Personal Data and/or Sensitive Personal Data, which is collected by the Corporation from Data Subjects interested in being provided with or being provided with any services, goods, or products rendered by the Corporation, shall be used as follows: i) to provide the services, goods, or products rendered by the Corporation (hereinafter referred to as the Services); ii) to identify Data Subjects; iii) to manage the Services; iv) to analyze the Services; v) to make procedures in order for the Data Subject to enter into contracts with Insurance and/or Bonding Institutions; vi) to update the Data Subject information; vii) to have a link with the Insurance and/or Bonding Institutions providing any products or services to the Data Subject; viii) to request the authorization from Data Subjects for the acquisition of new products and/or services; ix) to follow-up insurance policies and/or bonds purchased by the Data Subject (to issue checks for returns of premiums, to process premium collection, to coordinate the handling of incidents, and to pay claims from Data Subjects); x) to fill in the forms referred to as "Know your Customers", as well as to comply with the applicable provisions concerning money laundering; xi) to provide security to the Corporation facilities and to the Data Subjects entering into the same; and x) to provide advice to Subject Data regarding insurance policies, bonds, and prevention, which are required to comply with the obligations under the legal relationship of the Corporation with Data Subjects.

Personal Data from Data Subjects interested in being provided with any services, goods, or products rendered by the Corporation are used by the latter to perform trade research activities that are not required to comply with the obligations resulting from a certain legal relationship. Therefore, if the Data Subject should not agree with the fact that the Corporation uses its Personal Data for such purposes, the former shall express its opposition according to what is established in section five (5) of this Privacy Notice. If the Data Subject should not express its opposition, it shall be understood that it provides the Corporation with its consent.

Concerning the Personal Data collected by the Corporation from Data Subjects acting as Beneficiaries regarding services provided by the Corporation to a Data Subject, it is notified that their Personal Data are used by the former in order to identify the Data Subject and keep its data updated, as well as for those purposes required to comply with the obligations resulting from the legal relationship between the Corporation and such Beneficiaries as a result of being appointed as such according to the relevant contract, as well as to provide security to the Corporation facilities and to the Data Subjects entering into the same. Such purposes are required in order to comply with the obligations resulting from the legal relationship between the Corporation and Data Subjects.

Concerning the Personal Data from the Spouse of a Data Subject interested in being provided or being provided with any Services rendered by the Corporation, who is married by separate property regime and who is not or has not been entrusted with prominent public functions in the national territory or abroad, they are hereby notified that the reasons for which their Personal Data will be used are to provide security to the Corporation facilities and to the Data Subjects entering into the same. Such a purpose is required to comply with the obligations resulting from the legal relationship with Data Subjects, as well as to identify them, to update the files of Data Subjects being provided with any Services rendered by the Corporation, as well as to disclose such information pursuant to what is set forth in the following section four (4) when such a disclosure is required in order for the Data Subjects interested in being provided with any Services rendered by the Corporation are able to hire such Services. Such purposes are not required in order to comply with the obligations resulting from a certain legal relationship and therefore, if the Data Subject should not agree with the fact that the Corporation uses its Personal Data for such purposes, the former shall express its opposition according to what is established in sections four (4) and/or five (5) of this Privacy Notice and, if the Data Subject should not express its opposition, it shall be understood that it provides the Corporation with its consent.

Concerning the Personal Data from Spouses of Data Subjects interested in being provided or being provided with any Services rendered by the Corporation, who are married by marital property regime and who are not or have not been entrusted with prominent public functions in the national territory or abroad, they are hereby notified that the reasons for which their Personal Data will be used is to identify them, to provide security to the Corporation facilities and to the Data Subjects entering into the same, to create the relevant guarantees for bonds, and to disclose such information according to what is herein established in the following section four (4). Such purposes are required in order to comply with the obligations resulting from the legal relationship with Data Subjects.

On the other hand, concerning the Personal Data and/or Sensitive Personal Data collected by the Corporation from Data Subjects who are relatives (including Spouses) of a Data Subject interested in being provided or being provided with any Services rendered by the Corporation and who is or has been entrusted with prominent public functions in the national territory or abroad, they are hereby notified that the reasons for which their Personal Data and/or Sensitive Personal Data will be used are only those required to comply with the applicable provisions regarding money laundering, as well as to provide security to the Corporation facilities and to the Data Subjects entering into the same. Such purposes are required in order to comply with the legal provisions and with the obligations resulting from the legal relationship of the Corporation with Data Subjects.

Concerning the Personal Data and/or Sensitive Personal Data from Data Subjects who in the past were customers of the Corporation and who are not customers anymore, as well as those from Data Subjects interested in being provided with any Services rendered by the Corporation, but who are not actually provided with the same, as well as from Beneficiaries, Spouses and/or relatives (who are entrusted with or have been entrusted with prominent public functions in the national territory or abroad) of such Data Subjects, they are hereby notified that the Corporation only keeps their Personal Data and/or Sensitive Personal Data pursuant to what is set forth in Article 25 of the Law, that is, during the blocking period³ established in such a legal framework. Thus, once such a blocking period has come to an end, their Personal Data and/or Sensitive Personal Data will be deleted.

³ Article 3, Paragraph III, of the Federal Law for the Protection of Data Held By Private Companies or Individuals establishes that Blocking is the identification and maintenance of personal data once the reason for which they were collected has come to an end, with the sole purpose of determining potential liabilities regarding their handling, until the term established by law or contract has elapsed. During such a term, personal data may not be used and, when it has come to an end, they shall be deleted from the relevant database.

4.- TIMEFRAMES, REFERRALS, AND TRANSFERS

Timeframes to handle Personal Data and/or Sensitive Personal Data from Data Subjects shall depend on the legal relationship between the former and the Corporation, as well as on the obligations required by the legislation in force and the relevant authorities. However, concerning the Personal Data related to the images from Data Subjects that are captured using video-surveillance cameras, such information shall be kept by the Corporation only for a term of 30 (thirty) business days following the date on which it has been obtained and it shall be then deleted.

The information delivered to the Corporation shall be kept and protected by the latter pursuant to what is set forth in the legislation in force in order to keep such information as confidential in nature.

Pursuant to what is established by the Law, the Corporation shall provide access to the Personal Data and/or Sensitive Personal Data from the Data Subjects (by means of referrals) to those individuals acting as Data Controllers⁴, such as service suppliers, business partners, or third parties of the Corporation having a legal relationship with the same and who, as a result of such a legal relationship, need to know the information and commit to keep the same strictly confidential and reserved, and who shall state they know the terms and conditions of the present Privacy Notice and commit to comply with the same.

On the other hand, the Personal Data and/or Sensitive Personal Data from the Data Subjects being provided with any Services rendered by the Corporation, from the Spouses of such Data Subjects married by marital property regime, and from the Beneficiaries of such Data Subjects are disclosed by the Corporation to the Insurance and/or Bonding Institutions (whether national or international) with the purpose of entering into insurance and/or bonding contracts and complying with the applicable provisions regarding money laundering. Such disclosures shall not require the consent from Data Subjects under Article 37 of the Law.

Concerning the Personal Data and/or Sensitive Personal Data from the relatives (including Spouses) of Data Subjects interested in being provided with or being provided with any Services rendered by the Corporation and who are entrusted with or have been entrusted with prominent public functions in the national territory or abroad, they are hereby notified that the Corporation discloses their data to the third parties indicated in the preceding paragraph in order to comply with the applicable provisions regarding money laundering. Such disclosures shall not require the consent from Data Subjects under article 37 of the Law.

Concerning the Personal Data from the Spouses of Data Subjects interested in being provided with any Services rendered by the Corporation, who are married by separate property regime and who are not entrusted with or have not been entrusted with prominent public functions in the national territory or abroad, they are hereby notified that the Corporation discloses their data to the third parties indicated in paragraph four of this section whenever such a disclosure is required in order for Data Subjects interested in being provided with any Services rendered by the Corporation to be able to be provided with the requested Service.

⁴Article 3 Paragraph IX of the Federal Law for the Protection of Data Held By Private Companies or Individuals establishes that the Data Controller is the individual or entity that individually or jointly handles personal data on behalf of the Individual or Entity in Charge of such data.

Due to the foregoing, if Data Subjects being Spouses of the Data Subjects interested in being provided with any Services rendered by the Corporation and who are married by separate property regime should not express with a mark (x) their opposition to the fact that their Personal Data are disclosed according to what is set forth in the preceding paragraph to the third parties referred to in paragraph four of this section or through any means established in section five (5) of this Privacy Notice, it will be understood that their consent has been granted.

If the Personal Data and/or Sensitive Personal Data should be required by any kind of authorities or if they should be disclosed to the latter according to the legislation in force, such data shall be made available according to the law. Such a disclosure shall not require the consent from Data Subjects under article 37 of the Law.

5.- RIGHTS OF PERSONAL DATA ACCESS, CORRECTION, CANCELLATION, OPPOSITON, RENEWAL, AND LIMITATION

Data Subjects shall have the right to require the access, correction, revocation, cancellation, or opposition, as well as the limitation of use or disclosure of their data, by means of:

1.- A written request submitted to the Department of Personal Data of **Protección Dinámica Agente de Seguros y de Fianzas S.A. de C.V.**, to the following address: Avenue Periférico Sur number 5452, Olímpica, Coyoacán, Mexico City, Zip Code 04710, Mexico, from 09:00 a.m. to 05:00 p.m., in business days; or

2.- A request sent to the electronic mail datospersonales@protecciondinamica.com.

The Corporation shall provide a reply to the requests from Data Subjects, provided exceptions established in the Law do not apply and the requestor complies with what is set forth in article 29 of such a legal framework that establishes the requirements for the requests submitted by Data Subjects.

In order for the Corporation to process requests from Data Subjects regarding the access, correction, revocation, cancellation, opposition, and/or limitation of use or disclosure of their data, the latter shall attach the following information and documentation to their requests:

The name of the Data Subject, as well as its address and any other means in order for the Corporation to provide the reply to its request. The documents evidencing the identity or legal status of the Data Subject legal representatives (official ID of the Data Subject or legal representative and the power of attorney of the latter).

An accurate and precise description of the Personal Data and/or Sensitive Personal Data for which the right of access, correction, revocation, cancellation, opposition, limitation of use or disclosure is requested, as well as any other information or document that may contribute to find the relevant Personal Data.

The Corporation shall provide a reply to the request of a Data Subject regarding the access, correction, revocation, cancellation, opposition, and/or limitation of use or disclosure of its data within the terms established by the Law, that is, within a term of twenty (20) days following the reception of the Data Subject request. In case the request is practicable, it shall be implemented within a term of 15 (fifteen) days following the date on which the Data Subject is provided with the reply to its request. Such terms may be extended by the Corporation pursuant to what is set forth in Article 32 of the Law.

The obligation of information access shall be deemed as complied with by the Corporation if, in case of being requested by the Data Subject, a non certified copy of its Personal Data and/or Sensitive Personal Data is made available to the latter at the Corporation's address during a term of 15 (fifteen) business days following the date on which the Data Subject is provided with the reply to its request, or through any of the means set forth in Article 33 of the Law, which will be notified to the Data Subject in such a reply to its request.

6.- MODIFICATIONS TO THE PRIVACY NOTICE

In case the Corporation requires to use the Personal Data for purposes other than the ones agreed upon according to the legal relationship with Data Subjects and in the present Privacy Notice, or if the same should require from Data Subjects Personal Data other than those stated in the present Privacy Notice or changes in the disclosures of Personal Data and/or Sensitive Personal Data, Data Subjects shall be notified in writing, by phone, electronically, or by means of any other visual, audio, or optical means, or any other allowed by the technology currently or in the future, explaining the new intended uses for such an information, in order to obtain its consent. With the present Privacy Notice, Data Subjects are duly informed about the data being collected from them and for what purposes, as well as about the fact that such a Privacy Notice may be looked up at all times at the Corporation website www.protecciondinamica.com

The Corporation reserves its right to modify this Privacy Notice in order to adapt the same to the latest jurisprudences or legislative innovations, as well as to principles of authority and trade practices. In such cases, the relevant changes shall be posted in the website www.protecciondinamica.com

This Privacy Notice, as well as the general compliance with the Law by the Corporation, shall be ruled by the legislation in force and applicable in the Mexican United States. Any controversies resulting from such enforcement shall be settled by the National Institute of Transparency, Access Information and Protection of Personal Data (INAI, in Spanish) or before the relevant Courts from Mexico City, Mexico.

Latest update: March 9th, 2016.

Note: The English translation of the Privacy Notice uploaded in Prodisa's website is a courtesy only. In any case, the terms of the Spanish versions will prevail.