

## **Website Privacy Notice.**

The Company is committed to collecting and processing your personal data responsibly and in compliance with applicable data protection laws. This Privacy Notice ("Notice") explains how Proeza and its affiliates entities (together, the "Company," "we," "us," "our") collect, process, transfer and disclose personal data relating to all who visit and use our websites, [[www.proeza.com.mx](http://www.proeza.com.mx)], [[www.metalsa.com](http://www.metalsa.com)], [[www.citrofrut.com](http://www.citrofrut.com)], [[www.astrum.com.mx](http://www.astrum.com.mx)], [[www.proezaventures.com](http://www.proezaventures.com)], ("Site"). This Notice also describes the rights you have regarding the use of your personal data, the measures Proeza takes to protect the security of the data, and how you can contact us regarding our data protection practices.

### **1. Identifying the Data Controller of Your Personal Data**

When this Notice mentions the "Company", "we", "our", "us", it refers to the entity that is responsible for the collection and processing of your personal data, which is generally the entity obtains your personal data in the respective case. This entity also is referred to as the "Controller." When you access our Site and use our Services, your data is controlled by Proeza, S.A. de C.V., Av. Constitución No. 405 Pte. Pabellón M, Monterrey, N.L. 64000, Monterrey N.L., or one of its affiliated companies.

When you use the Site, you consent to the use of your personal data by the Company as outlined in this Privacy Notice.

### **2. What Personal Data We Process**

Our Site is not intended to receive personal information of a confidential nature from you. However, as part of the Notice, when you visit our Site, you may provide personal data about yourself. We may collect personal data about you including your name, age, email address, IP address, URL, the site from which you visit, phone number, cookies or similar devices, and social identification (in case you access from a social network).

the Company does not collect sensitive personal data (such as information related to racial or ethnic origin, political opinions, religion or other beliefs, health information, criminal background or trade union membership) without your explicit consent or as otherwise permitted by law.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **3. Other Personal Data We Collect**

As you navigate through our Site, we may use automatic collection technologies to collect certain information about your equipment, browsing actions and patterns, including, the details of your Site visits (e.g., resources that you access, traffic data, location data, logs, language); date and time of access; frequency, and other communication data; and information about your computer and internet connection, including your operating system, host domain, and browser type or detail.

The Company uses this information as statistical data to help us improve our Site and deliver a better and more personalized service by helping us determine traffic patterns, count the number of Site visits, determine traffic sources, and determine the frequency and last date of your visit to our Site.

#### **4. Cookies and Other Technologies**

Another form of data we collect directly is through cookies. Cookies are small data files which store data about your visit to the Site relating to how you entered our Site, where you navigate to and what data is of interest to you. We track and use this data for statistical purposes to help improve the products and services we provide to you.

#### **5. Why We Process Your Personal Data**

We only collect and process personal data when we have a legal basis to do so in accordance with applicable law.

We may process personal data where we have your consent to do so, including to provide you marketing communications and other materials that we think you might be interested in. Continuous use of our website, implies your consent to process your personal data.

#### **6. Recipients of Data**

We may disclose your personal data collected under this Notice on a need-to-know basis with our affiliates, trusted third parties and service providers, and in other instances as required or permitted by law, as further explained below:

- To our affiliates for the purposes described in this Notice.
- To our third-party distributors, contractors, vendors, service providers who provide services such as data analysis and storage, payment processing, order fulfillment, infrastructure provision, IT services, customer service, e-mail and direct mail delivery services, credit card processing, fraud prevention services, and other services in order to enable them to provide services.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We will only share personal data with companies, organizations or individuals outside the Company including where reasonably necessary to:

- Meet any applicable law, regulation, legal process or enforceable governmental request.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of the Company.
- In connection with a merger, acquisition, or other transaction or sell to a third party.
- When we have your consent to do so.

The Company does not collect or compile personal data for dissemination or sale to third parties for commercial purposes.

Where your personal data is transferred to third parties, we will require such persons to protect your personal data in accordance with applicable law (including by putting in place appropriate contractual arrangements with the agreements between the Company and third party vendors).

#### **7. International data transfers**

We are a global company. Your personal data may be stored and processed in any country where we have facilities or service providers, which may not have protections for personal data that are equivalent to those of your jurisdictions. By using our website, you acknowledge that we may transfer your personal data to countries outside your country of residence, and that these may provide different data protection rules than in your country and such rules may not be equivalent.

## **8. The Security of Your Personal Data**

The Company takes appropriate steps to maintain the security of your personal data and our Site. We have implemented appropriate technical, physical and organizational measures to ensure a level of security appropriate to your data (taking into account technology, cost and the nature of processing). In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Still, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee that your personal data is under absolute security with the existing security technology. If you have any questions about the security of our Site, you can contact us under "Contact Us" below.

## **9. Retention of Your Personal Data**

The Company retains your personal data for the period necessary to fulfill the purposes outlined in the Notice, unless a longer retention period is required by law or to fulfill a legal obligation.

## **10. Your Data Rights**

To the extent required by applicable law, you are entitled to access and obtain information on the processing of your personal data, to oppose to processing of your personal data, and to have your personal data rectified or cancelled. You also are entitled to withdraw any consent that you might have given with respect to the processing of your personal data at any time with future effect, and limit the use and disclosure of your personal data "Data Subject Rights".

If you would like to exercise your Data Subjects Rights or learn more about the processing of your personal data, please contact us using the information provided below under Section 13("Contact Us"). We will respond to your request(s) as soon as reasonably practicable, but in any case, within the legally required period of time.

If you are not satisfied with our response or believe that your personal data is not being processed in accordance with the law, you also may contact or lodge a complaint with the competent supervisory authority or seek other remedies under applicable law.

## **11. Use of Site by Minors**

The Site is not intended for use by individuals sixteen years of age or younger, and we request that these individuals not provide personal data through the Site.

If you are a parent or guardian of a child under the age of 16 and believe that he or she has disclosed his or her personal data to us, please contact us using the information provided under "Contact Us."

## **12. Changes to this Notice**

Our Notice may change when necessary. We will post any Notice changes on our Site.

### **13. Contact Us**

If you have any questions or concerns about the use of your personal data, please contact us at [arco.proeza@proeza.com.mx](mailto:arco.proeza@proeza.com.mx)

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