

COMPREHENSIVE PRIVACY NOTICE CUSTOMERS, SUPPLIERS, VISITORS AND GENERAL PUBLIC

ITP AERO MEXICO, the trade name by which ITP MEXICO, S.A. DE C.V. and its subsidiaries ITP MEXICO FABRICACIÓN S.A. DE C.V., ITP INGENIERÍA Y FABRICACIÓN S.A. DE C.V., INDUSTRIA DE TUBERÍAS AERONÁUTICAS MÉXICO S.A. DE C.V. TURBORREACTORES S.A. DE C.V and ITP MEXICO CASTINGS S.A. DE C.V. in compliance with the Federal Law of Protection of Personal Data in Possession of Individuals, as Responsible for the Use and Protection of your personal data, committed to protecting your privacy, discloses its privacy notice which informs how we treat and protect your personal data, the procedures for the collection, storage, use and transfer of your personal data. [It is recommended that you read this information so that you can know and accept the way we obtain, use and process the data you entrust to us.](#)

CORPORATE IDENTITY

ITP AERO MEXICO, as a group of companies formally established under Mexican law, has an address to hear and receive notifications in all matters relating to PERSONAL DATA, at Acceso IV No. 6, Zona Industrial Benito Juárez, Querétaro, Querétaro, Mexico, C.P. 76120.

CONTACT: For any matter related to personal data, you may contact the person responsible **for the protection of personal data** at the address mentioned in the previous paragraph or, if you prefer, at privacidaddatosmex@itpaero.com.

For the purposes outlined in this privacy notice, we may collect your personal data in different ways: when you provide them personally through physical documents; **directly**, for example, through electronic systems when you send us information by email or upload it to our website, our internal systems, public pages or establish contact by industrial conventions or send your information by courier; or **indirectly**, if they appear in social networks public and / or legal or governmental bases.

The legal bases for the processing of your personal data are:

- a) The execution of a contract to which the data subject is a party or for the implementation at the request of the data subject or his employer in dealings with ITP Aero.
- b) Compliance with legal obligations applicable to the controller under employment law in its dealings with third parties.
- c) Legitimate interest for the communication of data between ITP Aero companies on the basis of the LFPDPPP and CD 48 of the European Union's GDPR.

The personal data provided shall be kept for the duration of the relationship and, in any case, for the applicable legal periods and for the time necessary to comply with the purpose for which they were collected and to determine the possible liabilities that may arise from said purpose and the processing of the data.

OF THE DATA SUBJECTS, PERSONAL DATA THAT ARE PROCESSED; AND THE PURPOSES FOR WHICH THEY ARE PROCESSED.

I.- IN RELATION TO CLIENTS

The data we process are name, work telephone number, work address, work email address, RFC/Tax ID or Equivalent, job position, official identification, signature, bank accounts and Corporate appointments or powers that will be used for the purpose of following up your request for information about the services we offer and to send you the requested quotations, review or draft the contract, due diligence and business integrity processes, proceed with the contracting and formalisation of the commercial relationship, carry out invoicing and collection management processes and perform the activities inherent to the contracted service.

When performing activities in the facilities of ITP Aero Mexico, your personal image will be used through video surveillance in order to carry out access control, monitor the proper use of the facilities, ensure the safeguarding of their physical integrity, perform control actions and response to security incidents including health measures ordered by the SSA to control the pandemic, monitoring the policies of ITP Aero Mexico and compliance with regulations, requirements or exercise of legal actions.

Secondary purposes

Your data such as name, work telephone number and work email address will be used to follow up on the service provided, to provide customer service, to carry out surveys to evaluate the quality of service, to generate our customer directory. In case you do not want your data to be processed for these additional purposes, you can follow the procedure described in the chapter "[refusal of data processing](#)".

II.- IN RELATION TO SUPPLIERS

Once the proposal for services and / or supplies is accepted, personal data consisting of: name, address, telephone, e-mail, signature, official identification RFC/Tax ID or equivalent, CURP, tax information, social security number, place of birth, language, nationality, position or appointments, workplace address, work telephone, training, socio-economic study, current debts, credit history, bank accounts, judgments, in order to carry out the initial contact with the supplier, credit history, bank accounts, judgments, in order to carry out the initial contact for tendering services, carry out the study and selection of supplier according to our policies of "reliable" supplier through the investigation of its regulatory concepts in its commercial information that provide such status, to carry out due diligence for the assessment of business risks, to review or draw up the contract, to register and update the organisation's official supplier data, to grant access to our facilities and provide them with a uniform with the corresponding signage, to issue instructions or quality management notices, to accompany or initiate the exercise of legal proceedings, to carry out payment for the products supplied or services contracted and to comply with the obligations imposed by law in accordance with the contractual relationship.

When performing activities in the facilities of ITP Aero Mexico, it will be necessary to collect from you and your employees personal data necessary for the prevention of occupational hazards and compliance with regulations related to the subcontracting of business activities: name, work address, official identification, payment reports to Social Security and INFONAVIT, as well as your personal image through video surveillance in order to carry out access control, monitor the proper use of the facilities, ensure the safeguarding of their physical integrity, perform control actions and response to security incidents, monitoring the policies of ITP Aero Mexico and compliance with standards, requirements or exercise of legal actions.

Transfers

In order to comply with legal obligations, data such as: Name, address, telephone, RFC/Tax ID or equivalent, signature, official identification, bank account number, tax and social security information are transferred to authorities such as the Tax Administration Service (SAT), Ministry of Finance and Public Credit (SHCP), National Institute of Transparency, Access to Information and Protection of Personal Data (INAI), or those administrative authorities or by judicial requirement that is required by law or is necessary to fulfill obligations to you.

In addition to the above and in compliance with the provisions of the Act, we inform you that your personal data are shared within and outside the country with the following persons, companies, organizations and authorities other than us, being that all those entities receiving Personal Data, assume the same obligations and / or responsibilities of ITP Aero Mexico in accordance with the provisions of this Privacy Notice, informing you that they are shared for the following purposes:

Recipient of personal data	Country	Purpose
The holding companies, affiliates and/or subsidiaries of ITP Aero México	Mexico, Spain, England, Malta and USA	Payment of invoices, risk assessment, selection of reliable supplier.
Third party providers of financial and tax services	Mexico, Spain, England, Malta and USA	Interbank payments, Withholding of deductions.
Third-party providers of legal, certification, business integrity and due diligence services, data analysis, subcontracting obligation control platforms, occupational risk and access control services.	Mexico, Spain, Malta, England, and USA	Provision of services and advice for the performance of other services necessary or required by ITP Aero Mexico for the full compliance with the regulations and objectives of the company;



If you do not object to such transfers, we will assume that you have given us your consent, irrespective of the exceptions to consent provided by law.

III.-IN RELATION TO VISITORS AND THE PUBLIC IN GENERAL

Please note that upon entering the facilities of ITP Aero Mexico, your information will be collected regarding name, personal references, official identification, signature and job, being that, if authorized access to validate the personal data indicated, you will be given uniform and corresponding signage to identify you as a Visitor... Please note that in addition to the above data, your personal image will be used through video surveillance in order to carry out access control, monitor the proper use of the facilities, ensure the safeguarding of their physical integrity, perform control actions and response to security incidents, monitoring the policies of ITP Aero Mexico and compliance with standards, requirements or exercise of legal actions,

During your experience and navigation on the website, the data you provide us with and in accordance with our use of cookies as indicated, we will perform statistical activities in order to show you content of interest to you and improve your browsing experience.

Transfers

Due to the fact that our access controls are linked to platforms that we have contracted with international access control providers, this data will be transferred in the countries where the servers that store the information are located. ITP Aero Mexico, will ensure that those responsible for safeguarding the information, have the necessary security measures to safeguard their rights. ITP Aero Mexico will not perform any action of assignment or transfer of your personal data to third parties for purposes other than those outlined in this Privacy Notice.

REFUSAL TO PROCESS DATA

If you do not agree to the use of all or part of the personal data for accessory purposes. You can freely express such refusal by sending an email to privacidaddedatosmex@itpaero.com and request the form, being that once filled out, signed and enclosing your official identification you must send the aforementioned documentation to the same email, or if you prefer, you can deliver directly to the address of ITP Aero Mexico, requesting to be acknowledged as received by the person responsible for Personal Data Protection, within a period not exceeding 5 days from your request, we will send you the proof of registration in our exclusion list of people who have denied their consent.

When the privacy notice is not made known to you directly or personally, you have a period of five days in which, if applicable, to express your refusal to the processing of your personal data for purposes other than those that are necessary and give rise to the legal relationship. If you do not express your refusal for the processing of your data in accordance with the above, it will be understood that you have given your consent for the processing of the same, unless there is evidence to the contrary, and if this is the case you will be included in the exclusion list referring to persons who have expressed their refusal for the processing of their personal data.

Even if you have given your consent to the processing of your personal data, you may at any time exercise your right to revoke or object to the processing of your personal data.

CONSENT OF THE OWNER

In accordance with the provisions of the Federal Law for the Protection of Personal Data in Possession of Individuals, it is understood that, if this Privacy Notice has been made known or has been made available for its reading, the terms set forth in this Notice regarding the processing of your Personal Data are deemed to be consented to.

In the case of Sensitive, Patrimonial or Financial personal data, or in the case of transfer of data to third parties, or for the use of purposes other than the main ones not foreseen in the Privacy Notice, our Data Protection Officer will contact you using the information you have provided us to locate you, in order to obtain the consent of the owner expressly of those data that by law must be collected in this way, which will be carried out depending on the nature of the relationship, in the case of contractual obligations will be made through the contract or corresponding addendum or through the respective form of manifestation of acceptance of personal data processing that will be made available to the holder before the information is collected, likewise also affirms the

consent of the holder digitally, when accessed through the website or applications belonging to ITP Aero Mexico through the provision of data, prior to the dialogue windows in which the holder may indicate whether it accepts that the responsible handle their data according to the terms and conditions disclosed.

REVOCATION OF CONSENT

At any time you as the owner of the Personal Data that has previously granted consent for the processing or transfer thereof, may revoke such consent by requesting the format REVOCATION OF CONSENT to email privacidaddatosmex@itpaero.com and once received, you may deliver the completed form, attachments and original signature; scanned to the email or delivered directly to the address of ITP Aero Mexico, requesting to be acknowledged by our officer of Protection of Personal Data to immediately address the merits of your request and provide the determination, within a period not exceeding 20 days from your request for revocation of Personal Data, we will notify the processing of Personal Data, We will also proceed to include you in our exclusion list of persons who have revoked their consent by sending you a record of this situation as applicable or by indicating the implications in which the revocation is unfeasible due to the contractual relationship contracted, the effects of conservation and blocking, or to obtain your direct confirmation.

Please note that by revoking or not providing the requested information, we will most likely be obliged not to continue the process, the relationship (definite or presumed) of interest and prevent you from entering our premises, except under court order.

MEASURES TO LIMIT THE USE AND DISCLOSURE OF YOUR PERSONAL DATA

We inform you that following our commitment to the conservation and proper handling of personal data subject to processing at all times, aware of the rights you have in relation to the personal information collected, we have implemented a security and confidentiality policy within the same that allows the protection of your Personal Data, protecting them with administrative, technical and physical security measures such as contracts and confidentiality clauses with penalties, authorized access, distinguished, additional measures of protection for sensitive data, property and / or financial; security measures in technological systems to prevent damage, loss, alteration, destruction or unauthorised use, access or processing.

In order to enable you to directly limit the use and disclosure of your personal information, we offer you the following means:

- Your registration in the Public Registry to Avoid Advertising, which is in charge of the Federal Consumer Protection Agency (PROFECO), so that your personal data will not be used to receive advertising or promotions from goods or services companies. For more information on this registry, you can consult the PROFECO website, or contact it directly.
- Your registration on our opt-out list, so that your personal data will not be processed by us for marketing, advertising or commercial prospecting purposes. For further information, please send an e-mail to the following address: privacidaddatosmex@itpaero.com; you can consult our website www.itpaero.com or visit us at the address mentioned in this notice during working days and hours.

MEANS AND PROCEDURE FOR EXERCISING RIGHTS ARC

If you require to know the particular measures that ITP Aero México has implemented to protect your personal data, you can request it by exercising your RIGHT OF ACCESS described in the following paragraph.

DEFINITION OF ARC

***Right of Access:** This is the right of the Data Subject to know about the Personal Data related to him/her that is held by the Data Controller in question or its Processors, as well as to whom it has been shared and for what purpose.

***Right to Rectification:** Each Data Subject has the right to have his or her Personal Data rectified if it is inaccurate or incomplete.

***Right of Cancellation:** Each Data Subject has the right to request at any time that his or her Personal Data be deleted, which will happen once the blocking period has elapsed.

Blocking implies the identification and conservation of the Personal Data, once the purpose for which they were collected has been fulfilled; its purpose is to determine the possible responsibilities in relation to their processing, until the legal or contractual prescription period of these. During this period, your Personal Data will not be processed and once this period has elapsed, it will be deleted from the database or file. Once the data has been cancelled, the Controller shall provide the Data Subject with the corresponding notice. In the event that the Personal Data had been transmitted prior to the date of rectification or erasure and continue to be processed by third parties, the Controller shall inform the third party in question of the request for rectification or erasure, so that it may also proceed to carry it out.

***Right to object:** The Data Controller has at all times the right to request, provided that he/she has a legitimate cause, that the Data Controller stops processing his/her Personal Data.

To exercise these rights, you may fill out the ARCO FORM directly at our offices by requesting said form from the person responsible for Data Protection, following the instructions for filling it out, and attaching the documents indicated in the form itself; or if applicable, you may request it by e-mail to privacidaddedatosmex@itpaero.com so that it is acknowledged by our person responsible for data protection, filling out and attaching the documents indicated in the instructions for filling it out. The information requested may be sent as a digital file or in copies to our facilities during opening hours.

Your ARCO form shall, in all cases, contain and be accompanied by the following:

- I. The name of the holder and address or other means of communicating the response to the request;
- II. Documents proving the identity or, where applicable, the legal representation of the holder;
- III. A clear and precise description of the personal data in respect of which any of the aforementioned rights are sought to be exercised, and
- IV. Any other element or document that facilitates the location of personal data.

Once your ARCO request has been received, it shall be acknowledged and an answer shall be given within a period not exceeding twenty working days, counted from the date on which the request for access, rectification, cancellation or opposition was received, the determination adopted, so that if it is appropriate, the same is made effective within fifteen days from the date on which the response is communicated to the Data Subject. Except in those cases in which, due to the nature of the data subject of the request, it is necessary to extend the deadlines or require additional information because the information provided is not sufficient, in all cases the data subject will be informed of such circumstances.

The delivery of the response to your ARCO request will be free of charge, you will only have to cover the justified shipping costs or the cost of reproduction in additional copies that may be required.

USE OF TRACKING TECHNOLOGIES ON OUR WEBSITE

We inform you that on our website we use cookies to obtain personal information in an automated manner consisting of your name, language and your browsing preferences on our site used in the query in order to provide information of interest and customize the language of the content to display using permanent Cookies "_utma _utmz", temporary Cookies "_utmb, _utmc", Customization Cookies "icl_current_lenguaje" and Analytical Cookies "_utma ., _utmb, _utmc, _utmz". Only the data transmitted by the user through the use of the electronic forms on this website will be processed.

If you do not accept the use of cookies, please configure your web browser to refuse the installation and/or use of cookies on your computer.

From www.itpaero.com and in compliance with current legislation, we provide you with information that allows you to configure your Internet browser/browsers to maintain privacy and security in relation to cookies. For this reason, we provide you with information and links to the official support sites of the main browsers so that you can decide whether or not you wish to accept the use of cookies.

You can block cookies through your browser's configuration tools or you can set your browser to warn you when a server wants to save a cookie:

- a. If you use Microsoft Internet Explorer, under the menu option Tools > Internet Options > Privacy > Settings.
- b. If you use Firefox, under the menu option Tools > Options > Privacy > Cookies.
- c. If you are using Chrome, under Options > Advanced > Privacy.
- d. If you use Opera, in the Security and Privacy option, you can configure the browser.



Also, please note that our Information Technology department monitors the browsing history of the internal networks of ITP Aero Mexico, and either by security incident or request of the same user, will verify the contents of institutional emails both employees or users in general, to establish content filters navigation for their own safety and safeguarding the integrity of the information and our networks.

CHANGES TO THE COMPREHENSIVE PRIVACY NOTICE

This privacy notice may be modified, changed or updated as a result of new legal requirements; our own needs for the products or services we offer; our privacy practices; changes in our business model; or for other reasons. These modifications will be available to the public through our website www.itpaero.com or by coming directly to our establishment, to the address set out in this document and we will gladly inform you of the respective changes, if so considered, you may also be informed of the new versions of this privacy notice through advertisements, leaflets, brochures, or emails indistinctly.

The Data Controller is aware that it is his/her responsibility to periodically review the changes in the places already mentioned for such purpose, so it shall be understood that if he/she does not express otherwise, it means that the Data Controller has read, understood and agreed to the terms set forth therein, which constitutes his/her consent to the changes set forth in such updates regarding the processing of his/her Personal Data.

I give my consent to the processing of personal data in the terms informed in this Privacy Notice, declaring that I have read it in its entirety, knowing that it is available for consultation at all times.

Name/Signature/Date
