

COMPREHENSIVE PRIVACY NOTICE FOR APPLICANTS FOR VACANCIES, AND EMPLOYEES

ITP AERO MEXICO, 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 AERONAUTICAS 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 (LFPDPPP), committed to protect your privacy, discloses its privacy notice where it informs how it treats and protects your personal data, the procedures used 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 Calle 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 **personal data protection** at the address mentioned in the previous paragraph or, [if you prefer, by e-mail to \[privacidaddedatosmex@itpaero.com\]\(mailto:privacidaddedatosmex@itpaero.com\)](#).

For the purposes set out 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 send it 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 performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures at the request of the data subject.
- b) Compliance with legal obligations applicable to the data controller under labour legislation and the applicable collective bargaining agreement, prevention of occupational hazards and the obligations legally attributed by Mexican law to employers and workers.
- 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 will be kept for the duration of the employment 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 any 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 CANDIDATES FOR VACANCIES

When you apply for a vacancy for ITP Aero Mexico, will be collected your name, address, telephone, email, official ID, signature, date and place of birth, nationality, age, language or language, marital status, positions held, customs, curricular activities, recruitment and selection documents, employment and personal references, training, appointments, educational background, degree, ID number and copy of certificates in order to carry out the selection procedure and recruitment when applicable, to obtain their general identification data and personal references with a view to their integration into the organisation, to follow up on the registration and development of training, certifications or evaluation of competencies required for the position to which they apply, to register their personnel file once the proposed letter is accepted for the

position applied for, or in the event that there is no vacancy according to their profile, to keep their documents for the time when the job opportunity arises within our staff.

You are also informed that once the evaluation process for recruitment has begun, sensitive data consisting of physical evaluations will be requested in order to verify that you have the skills to perform the vacant job, according to the requirements of the job profile. Also in addition to the incorporation of the above data in your recruitment file, to enter the facilities of ITP Aero Mexico, and in compliance with the provisions of the Ministry of Health for pandemic control, we could make measurements of your body temperature, and your personal image will be captured through video surveillance in order to carry out an 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. Exceptionally, only if you have been selected for the offer of a critical position according to our integrity programs or certifications of the authority on security or access to protected information, this stage of the process you may be asked for your criminal record letter for those positions that require an assessment of reliability.

Secondary purposes In case you are not hired, ITP Aero México will keep your information for possible subsequent contacts in case of a new vacancy that fits your profile. In case you do not want your data to be processed for these additional purposes, you can perform the procedure outlined in the chapter "refusal for data processing".

II.- IN RELATION TO EMPLOYEES

Once the job offer is accepted, personal data will be integrated into your employee file consisting of: name, address, telephone, email, signature, official ID RFC/TaxID or equivalent, CURP, date of birth, place of birth, age, name of relatives, language, nationality, marital status, photograph, position, workplace address, work telephone, social security number, curricular activities, recruitment and selection documents, work references, training, appointment, educational background, degree, ID number, certificates, number of children, economic dependents, in **order to** keep track of attendance, internal communication with the staff, give work instructions, send internal administrative or general notifications, prepare the employee's employment file and assign him/her an employee number, provide access to employment platforms, send internal administrative or general notifications, preparation of your employment record and assign employee number, give access to ITP Aero Mexico platforms and assign work tools, to integrate and give attention to requests for promotion and / or promotion to higher positions or salary increases, follow up on the registration and development of training, certifications or evaluation of skills required according to their position and comply with obligations imposed by the laws according to the contractual relationship, as well as for the management of business integrity program of the company to notify and prevent risks of regulatory or labor non-compliance,

In addition to the aforementioned data, we inform you that we collect from you, jointly or separately, data consisting of bank accounts, income, current debts, afores, insurance, migratory movements and documents, lawsuits, which will be used for the purposes of generating and carrying out the payment of your payroll, withholding and paying social security contributions, stamping the payroll, processing food vouchers, processing the granting of employment benefits, the integration of a savings fund, following up on the processing of permits before the corresponding immigration and labour authorities in the event of joining or moving from the subsidiaries of the subsidiaries of the company, carry out procedures for the granting of employment benefits, the integration of savings fund, follow up the processing of permits before the immigration and labour authorities in case of integration or move from the subsidiaries of ITP Aero Mexico to the interior of the country, to comply with regulations relating to immigration and labour issues, to comply with the contract, for the payment of services rendered; compliance with accounting and / or tax obligations, for the exercise of legal instances; make withholdings and payments for alimony.

We inform you that in addition to the aforementioned data, in accordance with the Law we collect from you personal data considered as sensitive and therefore requiring special protection, being that jointly or separately the following data: State of health, union membership, medical history, illnesses, allergies, psychological information, medical incapacities, surgical interventions, vaccinations, anti-doping, toxicological examinations, socio-economic studies, disabilities, use of ophthalmological, orthopaedic, hearing aids and prostheses, blood type, height, weight and complexion and, exceptionally, we may require a criminal record letter. The data is collected for the purpose of following up and establishing work incapacities or absences and the consequences of these aspects in order to follow up on accident prevention

programmes, nutrition, clinical accompaniment; to register you and give you access to our maternity wards, to follow up on incapacities for the assignment or reassignment of work activities; to make diagnoses and integrate results for preventive and routine medical examinations; nutritional care; for the evaluation of occupational risks and recruitment of new insurance; to specify the reliability of the holder in relation to their income or position or activity to perform or performed within ITP Aero Mexico when the position to perform is subject to controls to comply with our programs promoted by the authority, such as security in the supply chain, or to process access to protected information of the company, its customers and / or any business partner whose protected information is necessary to access for the performance of the functions of his position; or as required by our regulatory compliance management systems, for the assignment of uniforms and badges, administration of access and electronic authentication to the facilities; to provide timely attention and follow-up of occupational health and safety incidents until their full conclusion; to provide medical care and process certificates in case of requiring internal disability, to comply with the employment benefits that you acquire because of your activity for ITP Aero Mexico as medical expense programs, health support and labor and family welfare, to make direct reporting and monitoring of implementation of compliance with obligations under the Collective Bargaining Agreement with the union that corresponds to its membership and the preparation of reports that it requires.

The company will process the personal data of third parties indicated by you in the job application and/or any other form or policy in which you indicate references, for the purpose of contacting them in case of emergency. When carrying out activities on the company's premises. Your personal image in addition to being incorporated into the employee file, will be used through video surveillance in order to carry out access control, supervise the proper use of the facilities, ensure the safeguarding of your physical integrity, carry out control actions and response to security incidents, monitoring of company policies and compliance with regulations, requirements or exercise of legal actions.

Secondary purposes

In addition, your image and voice may be processed, and we will use your personal information for the following purposes that are not necessary, but that allow and facilitate us to improve the work environment and carry out activities of continuous improvement in our processes, being the invitation to social, cultural, sporting or coexistence events in general organized by the Company, issue communications of birthday congratulations, achievements or dissemination of recognition in videos and internal publications on boards, the company's intranet and our website and establish satisfaction surveys and evaluation of the work environment. Likewise, your car's registration number may also be required in order to provide you with access to our parking areas.

Your printed fingerprint together with your signature may be taken from you on documents that may contain a declaration of your free will and on which your identity must be verified for legal purposes.

If 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](#)".

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 information, income may be 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 court order that is required by law or is necessary to fulfill obligations to you by reason of the employment relationship.

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

Recipient of personal data	Country	Purpose
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The holding companies, affiliates and/or subsidiaries of ITP Aero México	Mexico, Spain, England, Malta, India, USA, and as stated on the website www.itpaero.com under "Locations".	Personnel control, payment of invoices, payroll, employment history, training, qualifications, health risk assessment, management of internal communications, intranet, internal coverage of jobs, geographical mobility and movement of personnel between work centres of the group, work on common projects, compliance with legal or business requirements for the protection of information, organisational structuring, design of organisational charts and any other management required for the management of human resources and business relations within the business group to which the COMPANY belongs.
Third-party providers of financial, fiscal, tax, people management and occupational medicine services.	Mexico, Spain, England,	Payroll management, interbank payments, deduction withholding, savings fund administration, social security and tax system reports, medical services provided to the interior, migratory movements, insurance plans, access control and others required by the applicable legislation.
Third-party service providers for research, ethics programme management, mobility, legal, training, certification and data analysis.	Mexico, Spain, England, and USA	Work climate studies, cover the needs of the holder of the Personal Data, as well as in the performance of other services necessary or required by ITP Aero México for the full regulatory compliance of its objectives.
Third-party providers of financial services and products, including savings, credit and investment, health and life insurance.	Mexico	Processing of additional employment benefits and integration of the savings fund.

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.

Additionally we inform you that ITP Aero Mexico is part of a global company whose parent company is located in Spain, and with offices in different countries, so our control systems are linked and we are obliged to comply with the requirements of the European Union in the case of international data transfers which are reflected in our Global Data Privacy Policy that you can consult on the web www.itpaero.com.

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, signed, prior identification you must send the aforementioned documentation to the same email, or if you prefer, you can contact directly at the home of ITP Aero Mexico to our officer of Protection of Personal Data requesting to be accused of receipt, within a period not exceeding 5 days from your request, we will send you the record of registration in our register of exclusion of persons 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 on 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 reading, it is understood that the terms set forth in this Notice regarding the processing of your Personal Data are considered 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, the company will previously obtain the consent of the owner expressly and in writing 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 acceptance of processing of personal data 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 controller handle their data according to the terms and conditions disclosed.

REVOCACTION OF CONSENT

At any time you as the owner of the Personal Data that has previously granted consent for the processing or transfer of the same, you may revoke it by requesting the format **REVOCACTION OF CONSENT** to email privacidaddedatosmex@itpaero.com and once received, you can deliver the completed form, attachments and original signature; scanned to email or you can request it and deliver it directly to the address of ITP Aero Mexico, to be acknowledged as received by our officer of Personal Data Protection 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 also proceed to include you in our exclusion list of people 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.

MEASURES TO AVOID MEDIA OUTLETS

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: privacidaddedatosmex@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 deleted, the Data 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 Data Protection Officer 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 Data Protection Officer, filling it 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 automatically 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_languaje*" and Analytical Cookies "*_utma* ..*_utmb*,*_utmc*, *_utmz*". Only 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, institutional e-mail content of both employees or users will be verified 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