

## INTEGRAL PRIVACY NOTICE

This Privacy Notice describes and informs how Zozayacorrea Sahagún Arizaga Abogados y Fiscalistas, S.C. (hereinafter "ZSA"), located at Av. Americas 1930, Corporativo Country Club, 4th floor, Financial District, Guadalajara, C.P. 44610, Jalisco, Mexico, collects, uses and discloses certain personal information about clients, prospects and others parties interested in services information, obtained through the website with the domain [www.zosalaw.com](http://www.zosalaw.com) and all subdomains derived therefrom (the "Site") personally, by telephone, through electronic means or correspondence. In some cases, ZSA may obtain such information through other sources or third parties.

The information contained herein is issued pursuant to the Federal Law of Personal Data Protection Held by Private Parties, the Regulation of the Federal Law on Protection of Personal Data Held by Private Parties, the Guidelines of Privacy Notice and other applicable provisions.

Your data will be collected and stored by ZSA, who is responsible for the use and protection of such personal data and will safeguard it under the highest standards of protection and confidentiality that characterize us. If you share information with us or make use of our Site, it shall mean that you have reviewed, read and accepted the terms of this document.

### **Scope**

This privacy policy applies to anyone using the Site or any person that request information or hire ZSA's services by any means, unless otherwise stated, and anyone who contacts ZSA or makes available their personal data in any form (the "Holder"), provided that such action is not subject to a different privacy policy.

For purposes of this privacy notice, the term "personal data" shall mean any information collected regarding individuals or entities identified or identifiable persons; and "client" any individual or entity identified or identifiable who communicates ZSA their personal data through the Site, email, filling out forms, personally, and in general, by any means involving communication of personal data. Is the responsibility of the holder to ensure that the data provided voluntarily to ZSA is correct, true and complete, and shall promptly inform about any changes or updates.

### **What information do we collect?**

The personal data that ZSA may collect and treat include: your full name, phone, email, address, workplace, signature, ID, Passport and visa, nationality, immigration status, RFC, CURP, work position, bank account data, marital status, credit history, union membership, and fiscal and corporate information.

Similarly, there is a possibility to collect any type of sensitive information: bank statements, information on financial situation, private information regarding your family situation or health, which will happen only and only when it is strictly necessary for the proper provision of our services.

### **How do we collect your information?**

ZSA may collect your information when you directly provide it, whether personally, through the Site or any other legally permissible electronic, optical, documentary, audio or visual means, which includes without limitation the information sent when you:

- Hire Services from ZSA;
- Enter the Site;
- Contact ZSA in any way;
- Answer the satisfaction surveys received directly from ZSA or others;
- Subscribe to our newsletter mailing list;
- Respond to our requests, phone calls or messages.
- From other sources permitted by law, such as telephone directories, references from other companies or individuals, public databases of any public or private entity or agency, among others.

**For what purposes do we use your personal data?**

ZSA may access and use your personal data for the following purposes, which are necessary for the rendering of the hired service:

- Contact information of the client or prospective client;
- Provision of legal services to clients;
- Conduct studies on the interests, behaviors and demographics of client and client prospects to understand your needs and interests in order to be able to offer better services or provide certain related information;
- Provide, customize, maintain and improve our services;
- To maintain the security and integrity of our services;
- Communicate information about services, promotions, studies, surveys, news, updates and events;
- Bringing you relevant ads and content on our services;

Secondarily, we use your personal information for the following purposes that are not necessary for the hired service, but allow us to provide better care and client service:

- Personalize your experience on the Site;
- Informing the release or changes in our services, promotions and according to their interests, including sending communications through emails, phone calls, text and other physical or electronic means of messages communication;
- Conduct studies on client's habits and market;
- Any other activities designed to promote, maintain, improve and evaluate our services;

In case you disagree that your personal data will be processed for some of the purposes described in this section, please send an email to [contacto@zosalaw.com](mailto:contacto@zosalaw.com), to attend and resolve it in accordance with the law. You may change your choice at any time.

The request must include the following information: i) your full name; ii) if applicable, corporate name; iii) e-mail address; iv) phone; v) personal data which you desire to oppose, and; vi) reason for your request. Please note that ZSA doesn't sell nor will ever sell your information to third parties.

### **Transfer and referral of personal data**

In order to properly fulfill the purposes mentioned in this Privacy Notice, ZSA may disclose or transmit your personal information and data to companies or affiliated persons, whether domestic or foreign, as well as to third parties, including without limitation, to offices affiliates, suppliers, advisers, consultants, either nationals or foreigners.

ZSA may transfer your information to government agencies and third parties, same as in our sole discretion deem as necessary or appropriate to answer any process legal claims, to protect our property rights or even a third party, public safety in general or any person, to prevent or stop any illegal activity or go against good morals and to ensure compliance with the law.

If ZSA requires to use your personal data for purposes other than those agreed in this Privacy Notice, you will be notified via email, explaining the new purposes for which ZSA intends to allocate such information in order to obtain previous approval.

### **How do we protect and retain your information?**

Your personal data will be preserved based on the principles of legality, consent, information, quality, purpose, loyalty, proportionality and accountability, same as are stipulated in the Law. ZSA have already implemented policies and mechanisms that protect administratively, technically, electronically and physically the personal data provided to us in order to avoid loss, misuse or unauthorized access, publication, modification or destruction of such personal data. These privacy practices are carried out on a permanent basis to grant adequate protection, privacy and confidentiality that personal data deserve.

ZSA retains information for a period of 10 years, unless you request the deletion of your account or information. In some cases, we may keep certain information in our database, even if you delete your account, until the actions that may arise from our legal relationship extinguish, in which case they will be preserved solely for purposes of responsibilities arising from its treatment or as required by law.

### **What are the means to exercise their rights of access, rectification, cancellation or opposition ("ARCO")?**

In accordance with the provisions of the law, you can access, modify and cancel your personal data and oppose the disclosure thereof through the procedures implemented by ZSA.

For a better understanding, below we explain the ARCO rights:

- **Access:** You have the right to know what personal data we hold about you, why we use it and the generalities of its treatment.

- *Rectification*: It is your right to request the correction of your personal information in case it is incorrect, outdated or incomplete.
- *Cancellation*: You have the right to remove your information from our records or databases, where you consider that it is not being used in accordance with the principles, duties and obligations established under applicable law.
- *Opposition*: You can oppose or request the cessation of the use of your personal data for specific purposes.

To exercise any of the rights ARCO or revocation of the consent that you have given us, you must send an email to [contacto@zosalaw.com](mailto:contacto@zosalaw.com), wherein we will attend and resolve your request in accordance with the provisions of Law.

The ARCO Application must contain at least the following information, as required by Article 29 of Law:

- The name and address of the holder or other means to communicate the response to his/her request;
- The documents proving his/her identity or, where appropriate, the legal representation;
- Clear and accurate description of the personal data of which is seeking to exercise any right (reason for the request);
- In the case of rectification of any of your personal information, it shall indicate the modifications to be made and provide documentation supporting your request;
- Any other item or document that facilitates the location of your personal data, and any other documents required by law at the time of filing the application.

Where a third party makes the application on your behalf, legal representation must be proved by proxy signed before two witnesses or public instrument, identifying the holder of personal data and the legal representative.

ZSA will notify the holder the determination made within a maximum period of twenty (20) business days from the date the application was received, and if it is appropriate, it will take effect within 15 (fifteen) business days following the date on which the answer is given by ZSA.

ZSA may deny the exercise of ARCO rights, in the following cases:

- When it is not the holder of the personal data nor the legal representation has been duly accredited
- When your personal data is not held in our database;
- When the rights of a third party are injured;
- Where there is a legal impediment or resolution of a competent authority to restrict your ARCO rights;
- When rectification, cancellation or opposition had been previously requested and applied.

The answer may be partially negative, in which case, ZSA will attend the request in the pertinent part.

Not in all cases ZSA can accommodate your request or terminate the use of your information immediately, since it is possible that for some legal obligation, we require your personal data. Also, you should consider that for certain purposes, revocation of consent will mean that we cannot continue to provide services to you and might mean even the conclusion of your relationship with us.

### **Updates to the Privacy Notice ZSA**

In case ZSA, for any reason made any total or partial updates or changes to this Privacy Notice, the same will be hereby made and we will notify you by email.

### **Acceptance**

The processing of your personal data is subject to your consent as a holder, except as otherwise provided in the Law and its Regulations. In accordance with the eighth article of the Law, by the simple fact of not expressing opposition after reading this privacy notice, it means you consent tacitly the processing of your personal data, except those that require explicit consent in terms of the Law.

At the time you share your information and make use of our Site, it means that you have reviewed, read and accepted the terms of this Privacy Notice. You represent that the personal information you provide to ZSA, have been obtained in a free, informed, voluntary and unequivocal way.

### **Contact**

We provide the following means of contact for any questions or comments about our privacy notice, or in case you require advice or make any updates to your personal data.

Responsible: Zozayacorrea Sahagún Arizaga Abogados y Fiscalistas, S.C.

Phone: (33) 2015 1650

Address: Av. de las Américas 1930, Piso 4, Country Club, 44610, Guadalajara, Jalisco

Schedule: Monday through Friday from 9:00 am to 2:00 pm and from 4:00 pm to 7:00 pm (UTC -6:00)

Email: [contacto@zosalaw.com](mailto:contacto@zosalaw.com)

Last update: July 2019.