

## RESPUESTAS ÓPTIMAS EN MAYOREO, S.A. DE C.V.

**RESPUESTAS ÓPTIMAS EN MAYOREO, S.A. DE C.V.** (hereinafter “**ROM**”), with permanent address to hear and receive notifications in Poniente 134 No. 680-A, Col. Industrial Vallejo, Delegación Azcapotzalco, C.P. 02300 Mexico City, in compliance with Ley Federal de Protección de Datos Personales en Posesión de los Particulares (“the Law”), Reglamento de la Ley Federal de Protección de Datos Personales en Posesión de los Particulares (“Regulation”) and Lineamientos del Aviso de Privacidad (“the Guidelines”).

In accordance with was previously established, “**ROM**” issues the following Privacy Notice (the "Notice"), in order to ensure privacy and the informed and legitimate processing of their personal data treatment, reiterates its commitment to privacy and the right to informational self-determination .

### Purpose and Use of Information.

“**ROM**” will use your information for the following main purposes:

- A. Identify it and contact you.
- B. Complete the registry as a Distributor ([obtain the editable .PDF here](#)).
- C. Evaluate credit grants.
- D. Register you as a Client or prospective Client, and have your information in our systems. ([Get the privacy notice](#))
- E. Provide products and services contracted with “**ROM**”, and fulfill its contacted obligations with you.
- F. Carry out transaction with “**ROM**”.
- G. Maintain an optimal communication to the needs and interests of customers to improve our services and our products.

Additionally, your personal information will be used for the following secondary purposes:

- a) To submit press releases, newsletters and promotions.
- b) Credit and collection
- c) Site update, new product information, product update information, discounts on the prices of products, information on events, special sales, price lists, contests, sweepstakes and online surveys.
- d) Improve the Customer experience or the Distributor of our products and services.
- e) To be aware of the level of Customer satisfaction according to the products and services provided.
- f) Register Clients in systems of “**ROM**” for follow ups on requirement related services.

“**ROM**” collects, uses, stores, and/or transfers your personal data to the extent that the law allows in order to: promote and advertise “**ROM**” products and/or services, as well as to contact you to send over “**ROM**” communications.

If the Holders do not want their personal data to be processed by the previously mentioned secondary purposes, or any of them, you can refuse consent from this moment on by sending your request via e-mail to the following address: [avisodeprivacidad@gruporom.com](mailto:avisodeprivacidad@gruporom.com)

Should Holders state their refusal in this regard, this shall not be grounds for “**ROM**” to stop providing the products and/or services contracted with “**ROM**”; we also inform you that you have a period of five (5) working days to let us know of this refusal.

Type of information collected. “**ROM**” will seek its data when: the customer or owner fills the web registration form. In emails sent by the holders of personal data. When the owner is given as customer within the system of the “**ROM**” data and information requested may be the following: name of the applicant or trade name (if applicable). Official identification of the legal representative or natural persons. Proof of address information to contact you (phone, cell phone and/or email). Additional contacts (information from invoices, purchases and payments) tax documentation (Taxpayer’s ID number, complete certificate, proof of tax domicile, company name). Charter (case of legal entity).

### **Type of information collected.**

“ROM” will collect your data when:

- a. The Client or Holder fills the web registration form.
- b. In emails sent by the Holders of personal data.
- c. When the holder is registered as a Client within the “ROM” system.

The collected data and information requested may be the following:

- a. Applicant's Name or Company Name (if applicable).
- b. Official identification of the legal representative or natural persons.
- c. Proof of address.
- d. Contact information (telephone number, cellphone number and/or email address).
- e. Additional contacts (Billing information, purchases and payments).
- f. Tax documentation (Taxpayer's ID number, Complete certificate, Proof of tax domicile, Company name).
- g. By Laws (in the case of a legal entity).

### **Protection of information.**

The information obtained through the website of "ROM" is protected by physical, technological, technical and administrative security, safeguarding the Holder's information. The measures used by "ROM" to protect personal data will be against damage, loss, alteration, destruction, use, or unauthorized access or processing. However, "ROM" cannot guarantee that problems with the Holder's connections or devices will not occur, so despite having sufficient security infrastructure, violations may be presented, not related to "ROM", whereby the Holder of Personal Data assumes the risk.

Only authorized “ROM”'s personnel that has complied and observed the confidential requirements, may participate in the processing of their personal data. Authorized personnel that has complied and observed the confidential requirements are prohibited from allowing access to unauthorized persons and use your personal data for purposes other than those set out in this Privacy Notice.

### **Confidentiality of the information.**

"ROM" is committed to not share confidential information provided by the Holder with any third parties, unless authorization from the Holder is given.

Despite its policy of not disclosing the information provided by the Holder, "ROM" reserves the right to disclose your information when a court order or legal action is taken against malicious Holders of the information contained on the website

Due to the above, the Holder agrees and understands that this privacy notice does not apply to information that the Holder voluntarily provides to communicate with others via electronic mail, social networks, chats or similar activities. It is the Holder's responsibility the type of information disclosed to participate in the above-mentioned activities.

“ROM” is not responsible for the data Holders provide to third parties that could have promotions or links to records of their own utility.

### **Data on Social Networks.**

“ROM” informs you that Social Networks (such as Facebook®, Twitter®, LinkedIn® and Google+®, among others) are a communication platform between digital media and, as they are not related to “ROM”, they are not under its responsibility. Therefore, in order to maintain communication with the web users, the Holder's information will be requested.

Also, “ROM” will be able to access the following information:

- Profile picture.
- Basic information.
- Contact information.
- Photos in general .

It is noteworthy that according to the level of security that the holder has in any Social Network, “ROM” will not be able to access the profiles that each Holder established in the network.

**Transference.**

“ROM” informs you that your personal data may be transferred, in the case of Authorities to which by provision of a Law information may need to be transferred in accordance with the following:

- I. Implies that the transfer is necessary or legally required to safeguard a public interest, or for the administration of justice.
- II. Involves the establishment, exercise or defense of a right in a judicial proceeding.
- III. Companies that are affiliates or subsidiaries of “ROM” and have the same processes and internal regulations.

Personal information only may be transferred to third parties other than those mentioned above by: consent, by resolution or order of judicial or administrative authority and in the case of personal information that is considered public by provision of a law. The personal data that is collected will be kept by "ROM" for a period of 10 years in physical and electronic means (taking into consideration administrative, accounting, tax and legal aspects). However, at the end of the business relationship will be canceled to avoid an improper treatment of the same, based on article 11 of “the law”.

Personal Data may only be transferred to third parties other than those mentioned above, by:

- 1) Express consent.
- 2) By resolution, or order of court, or administrative authority.
- 3) In the case of personal information that by under the provisions of a law is to be considered public.

The Personal Data is collected, shall be retained by “ROM” for a period of 10 (ten) years on physical and electronic media (taking into account administrative, accounting, tax and legal aspects). However, at the end of the business relationship they will be canceled in order to avoid undue processing thereof, based on article 11 of “the Law”.

In accordance with the provisions above, “ROM” may transfer your personal data to national or international third parties or related commercial or contractually with “ROM”, as long as it is necessary to fulfill the purposes described in this Privacy Notice. “ROM” can also transfer your personal data in the specific cases provided by "the Law”.

“ROM” may transfer your personal data to the following entities:

- “ROM” affiliates and subsidiaries.
- Third party service providers to fulfill the legal obligations undertaken by “ROM”.
- Commercial partners with which “ROM” carries out agreements or contracts focused on developing new products and/or services.
- Third Parties who request job references from “ROM” former collaborators.
- Third parties arising from a corporate restructuring, including; merger, consolidation, sale, liquidation or transfer assets.
- Other transmissions under the cited “Law” and its "Regulation"

### **ARCO Rights.**

The means that the Holder has to exercise rights of access, rectification, cancellation and opposition under the Federal Law on Protection of Personal Data Held by Private Parties, may do so by contacting the Data Protection Committee of “**ROM**”.

- **ACCESS.** The data holder may request information regarding specific data, data included in a data system or all of their data undergoing processing, they may do so personally or through their legal representative.
- **RECTIFICATION.** Faculty to request that inaccurate or incomplete data be modified, they may do so personally or through their legal representative.
- **CANCELLATION.** Faculty of the Holder of the Personal Data to request cancellation of their data when they are unnecessary or irrelevant to the purpose for which they were collected, they may do so personally or through their duly accredited legal representative. There are cases in which personal data cannot be cancelled by operation of law.
- **OPPOSITION.** Faculty to be dissatisfied at the processing of their data, they may do so personally or through their legal representative.

Holders may, at any moment revoke their consent given to “**ROM**”, for the processing of their personal data, limit the use or disclosure thereof, as well as exercise the ARCO rights under the Law, by sending your request to the following email address: [avisodeprivacidad@gruporom.com](mailto:avisodeprivacidad@gruporom.com) through the document titled “Formato de Derechos ARCO”.

Also the Holders may also exercise their Rights by sending a written request including their full name, phone number, domicile, or email address to receive notice, and a single copy of their official identification to the following address: Poniente 134 No. 680- A, Col. Industrial Vallejo, Delegación Azcapotzalco, C.P. 02300 Mexico City The request must be directed to the Protection Data Committee.

The request to exercise "ARCO" rights must have the following information:

The personal data Holder's full name.

- I. Address or any other means to communicate the answer to their request ;
- II. Documents proving identity or, where applicable, the Holder's legal representative;
- III. Any other document or item that facilitates the location of the personal data.

In accordance with the provisions of Article 29, “**ROM**” will respond to your request within a maximum of twenty (20) working days from the date of receiving the request for access, rectification, cancellation or opposition. An answer will be given about its origin to your email address, sent to the email address indicated in the application itself or by sending a letter to the physical address you specified. Within this period, we will inform you about the source thereof. It will be deemed that “**ROM**”, has fulfilled its duty at the time it delivers the mail to the Postal Service or on the date “**ROM**” responds to your email.

### **Effects of termination.**

“**ROM**” informs the Holder that the cancellation of Personal Data will result in a locking period after which "**ROM**" will proceed with the deletion of the corresponding data. "**ROM**" will give notice to the Holder when their Personal Data has been canceled. In the case of Personal Data that is no longer necessary to fulfill the purposes set out in this Privacy Notice and in the applicable legal provisions, the Personal Data will be deleted from the "**ROM**" database.

"**ROM**" is not obliged to cancel the Holder's Personal Data in the case of the assumptions established in article 26 of "the Law".

### **Limitation on the Use or Disclosure of Personal Data.**

Likewise, Personal Data Holders can limit the use or disclosure of their personal data in accordance with the following:

- I. Enroll in the Public Registry to prevent Advertising of the Federal Consumer Protection Agency. For more information regarding this option, you can contact directly with the PROFECO entering the following link: <http://rpc.profeco.gob.mx> or calling 96 28 00 00 from Mexico, Guadalajara and Monterrey, and 01 800 962 8000 from the rest of the Mexican Republic.
- II. You can also make your registration on the link below in the section "consumidores - registra tu número telefónico" ingresando los datos solicitados.
- III. Request "**ROM**" your registration to the "**Exclusion List**", in order to not receive information about our products and services.

#### **Data Protection Committee.**

The Data Protection Committee establishes controls and processes to protect personal data against loss, damage, alteration, destruction, use, unauthorized access or treatment. Also, "**ROM**" has established attention processes to Holders so that they can exercise their rights of access, rectification, cancellation and / or opposition to Ley Federal de Protección de Datos Personales en Posesión de los Particulares.

The Data Protection Committee ensures that the personal data contained in the databases are relevant, accurate and up to date for the purposes for which they were collected and when they are no longer necessary to fulfill the purposes intended, should be cancelled.

The Holder is able to make any comments regarding this Privacy Notice or exercise their rights under the Ley Federal de Protección de Datos Personales en Posesión de los Particulares applied to the "**ROM**" Data Protection Committee, located in Poniente 134 No. 680-A, Col. Industrial Vallejo, Delegación Azcapotzalco, C.P. 02300 Mexico City, or sending an email to the following address: [avisodeprivacidad@gruporom.com](mailto:avisodeprivacidad@gruporom.com)

#### **Videotaped Areas.**

"**ROM**" may carry out video recording in common areas regarding visitors to the facility. The images collected by video surveillance cameras will be used for SECURITY purposes, as specified in the Privacy Notice for videotaped areas you may consult in the video recording areas on the "**ROM**" premise.

#### **Use of cookies.**

To ensure that this website is being well managed and to facilitate improved navigation, "**ROM**" may use cookies. A cookie is a file that is downloaded to the Holder's device to access certain websites to store and retrieve information about navigation that is made from said equipment. For additional information about how we use cookies and other tracking technologies, and how you can control them, you can review our Cookies Policy.

#### **Changes of the Privacy Notice.**

"**ROM**" may modify in its sole discretion this Privacy Notice. These changes will be made known to the Holders of "**ROM**", through our website <http://www.romrefacciones.com/> in the section of Privacy Notice. Accordingly, "**ROM**" also requires to make notice to Holders by issuing statements whether physical or electronic, to the effect that if the Holder is in a position to exercise their ARCO rights.

#### **Links to third party sites.**

The Holder may access third party websites through links available on this website. The Holder understands and agrees that the use of websites of third parties, including other "**ROM**" sites, will be administered by the policies of those sites and not by this Privacy Notice.

#### **Acceptance of the Privacy Notice.**

The Privacy Notice is a valid agreement between the Holder and "**ROM**". If the Holder uses "**ROM**'s" SERVICES, it means you have read, understood, accepted and consequently agreed to the terms of the Privacy Notice. In the

event that the Holder is not in accordance with the terms of this Notice, he/she should not provide any information, or use the products and services or any information related to this website.

### **Doubts and Complaints.**

“ROM” offers the Holder the following email address: [avisodeprivacidad@gruporom.com](mailto:avisodeprivacidad@gruporom.com) to contact in case of any doubts and complaints regarding products and services. The Holder may also deliver questions and complaints to the “ROM” domicile located at Poniente 134 No. 680, Col. Industrial Vallejo, Delegación Azcapotzalco, C.P. 02300 Mexico City.

“ROM” acknowledges that the site <http://www.romrefacciones.com/> may present flaws, so in case any failures occur in this site; send an email to the following address: [avisodeprivacidad@gruporom.com](mailto:avisodeprivacidad@gruporom.com)

### **Questions or Comments.**

If the Holder has any questions about this Privacy Notice, please contact “ROM” via the following email address: [avisodeprivacidad@gruporom.com](mailto:avisodeprivacidad@gruporom.com)

### **Denouncement.**

If the Holder considers its Right to Personal Data Protection has been the subject of improper handling or contrary to the provisions of the Federal Law on Protection of Personal Data Held by Private Parties and its Regulations, they can file a report or claims before the National Institute of Transparency, Access to Information and Protection of Personal Data (INAI), for more information:

- Call toll free **Tel INAI 01 800 835 43 24**. Service hours are from 09:00 to 18:00 hours, Monday to Thursday and Friday from 09:00 to 15:00 hours from the center of the Mexican Republic.
- You can also go to the office located at Insurgentes Sur No. 3211 Col. Insurgentes Cuicuilco, Coyoacan, C.P. 04530; or
- Visit: <http://www.ifai.org.mx>

### **Jurisdiction and Applicable Law.**

This Privacy Notice is governed by the applicable laws in the United Mexican States, in particular, by the provisions of the Ley Federal de Protección de Datos Personales en Posesión de los Particulares and its Regulation.

In case of any dispute or controversy arising from the interpretation, compliance and enforcement of this notice or in connection with it, “ROM” and the Holder will amicably seek to reach an agreement within thirty (30 ) calendar days, counted from the date on which any difference may present itself and the event be made notified in writing to the counterparty.

In accordance with the foregoing, any dispute or controversy will be held at Centro de Justicia Alternativa del Distrito Federal, taking it under the protection of the Law of Justicia Alternativa del Tribunal Superior de Justicia del Distrito Federal and its internal Regulation in force at the time that the controversy or dispute arises.

In the event that the parties do not reach an agreement, they hereby agree to submit all disputes arising out of this Notice or the documents that relate to it, they will be submitted for a final resolution to the jurisdiction and laws of the Administrative Federal Authorities or Federal Courts of Mexico City, renouncing to the effect of any other jurisdiction that by reason of their present or future domiciles or for any other reason may correspond.

*Last update of this Privacy Notice: December 2017*