

COMPANHIA GONEVO, S.A. DE C.V. PRIVACY NOTICE

In compliance with the provisions of articles 15, 16, 17, 18 and other correlatives of the Federal Law on Protection of Personal Data in Possession of Individuals published in the Official Gazette of the Federation on July 5, 2010 and in force as of July 6, 2010 (the "Law"), this Privacy Notice is extended.

I.- Responsible for the Processing of the Personal Data.

The responsible for the use and protection of your personal data is COMPANHIA GONEVO, S.A. de C.V. (Hereinafter referred to as the "Responsible"), whose offices are located in Lázaro Cárdenas 1007, Colonia Residencial Santa Bárbara, San Pedro Garza García, Nuevo Leon, Zip Code 66266, and who hereby informs you that the Personal Data that they shall collect from you as the owner thereof (hereinafter the "Owner"), will be treated strictly for the purposes detailed in this document.

II.- Purpose of the processing of Personal Data.

The Responsible, for the achievement of its corporate purpose and in particular to be able to offer and provide a better service to its customers, requires Personal Data of individuals, or of companies from which requires personal information of their representatives or shareholders.

The Personal Data will be treated strictly to achieve the following purposes:

- Confirm your identity.
- Integration of the customer database.
- Prepare tax receipts.
- Perform electronic invoicing.
- Comply with the requirements made by the authorities, necessary to safeguard the public interest.
- Submit tax returns to the Administration Service Tax (SAT) and to the Ministry of Finance and Public Credit (SHCP).
- Negotiation, compliance and termination of the legal relationship between the Responsible and the Owner.
- The management, administration and provision of services provided by the Responsible
- For purposes of giving information to firms that perform audits.
- Address complaints
- Elaborate or modify contracts between the Owner and customers.
- Conduct service and quality surveys, as well as offer or promote own or third-party products.

- Prepare statistics and reports on the services provided by the Responsible in order to keep an internal control of these services and to follow up on them in a timely manner.
- Comply with the legal obligations of the Responsible, which include those arising from the Federal Law for the Prevention and Identification of Operations with Resources of Illegal Origin.

III.- Personal Data collected

The Personal Data that the Responsible collects is:

PHYSICAL PERSON:

- Full name;
- Home;
- Street;
- Number;
- County;
- Postal Code;
- City;
- State;
- Email;
- Fixed and cellular telephone number;
- Federal Taxpayers Registry (RFC).

LEGAL ENTITY:

- Denomination ;
- Federal Taxpayers Registry (RFC);
- Home;
- Street;
- Number;
- County;
- Postal Code;
- City;
- State.

IV.- Options and means offered by the Responsible to limit the use or disclosure of Personal Data.

In order to limit the use or disclosure of Personal data, the Responsible safeguards said personal data under computer programs with limited access through the use of passwords with high security specifications, only to the individuals who, due to their functions, receive faculties for it.

Both in the case of personal data contained in electronic media and in physical documents, the Responsible uses the same security measures as those applied in their own information.

Likewise, the Responsible obtains information the staff that due to their functions have access to, personal data, contracts, agreements or obligation of confidentiality, contemplating that the personal data is confidential information and therefore, in case of divulging said confidential information, it will be credited to the civil and criminal penalties that may apply.

Finally, the Responsible has implemented policies and internal processes applicable to their staff, through which personal data is used by a minimum of people, limiting the use of the means of reproduction, and generating the obligation to destroy all those copies or reproductions of documents containing personal data that are not strictly necessary for the proper performance of the functions of the Personnel of the Responsible, as well as the prohibition of extracting from the offices of the Responsible any type of information containing personal data.

V. - Options to exercise the rights of access, rectification, cancellation or opposition (ARCO Rights).

The Owners have the right to know what personal data we have, the use of it and the conditions of use that we provide (Access), have the right to request the correction of your personal information in case it is inaccurate (Rectification); that we remove it from our databases when he/she considers that the data is not being used in accordance with the principles, duties and obligations set forth in the regulations (Cancellation); and also to oppose the use of personal data for specific purposes (Opposition). These sets of rights are known as ARCO Rights.

You can revoke the consent that in your case has granted us for the treatment of your personal data. However, it is important to keep in mind that we may not be able to respond to your request or terminate your use immediately, as it is possible that due to some legal obligation we may continue to process your personal data. In addition, you must consider that for certain purposes; the revocation of the procedure implies that we can no longer continue to provide the service you requested, or to terminate your relationship with us.

The Owners of personal data addressed by the Responsible, may exercise the ARCO rights, by means of a written request that must be presented physically at the Responsible offices located at the address indicated previously or at the email avisodeprivacidad@wearegroundwork.com

The request for ARCO rights must contain the requisites of Article 29 of the Law, such as:

- The name and address of the Owner, or other means to communicate the response to the request.

- The documents that prove the identity or, where appropriate, the legal representation of the Owner.
- The clear and precise description of the personal data regarding to which one is seeking to exercise any of the rights.
- Any other element or document that facilitates the location of personal data, as well as any other document required by the legislation at the time of submitting the application.

Once the request has been submitted, the Responsible will process it in accordance with the provisions of the Law, the Owner must pay the costs of sending or reproducing the personal data, as well as an amount equivalent to three days of the general minimum wage in force in Mexico City, when the same person reiterates an application in a period of less than twelve months and with the exceptions indicated in the Law.

The revocation of the consent that the Owner of the personal data intends to make must be done by the same means as if it were the rights mentioned in the first part of this section and will be subject to the procedure provided for it by the Law.

VI.- Limitation of use or disclosure of your personal information

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

- Registration in the Public Registry to Avoid Publicity, which is in charge of the Federal Consumer Protection Office, with the purpose that your personal data is not used for advertising or promotions of companies or goods or services. For more information, please contact the Federal Consumer Protection's Office

VII.- Transfer of personal data.

The Responsible informs the Owner, by means of this notice, that he may transfer personal data to national or foreign third parties, in the following cases:

- To the financial institution in which the Responsible has its bank accounts, through which payments are made by the Owner.
- To third parties for the provision of legal and / or accounting and / or administrative advisory services related to the preparation of the various contracts, declarations, reports and other legal instruments that may be required, as well as the judicial or extrajudicial interpellation for compliance of obligations.
- To third parties who, at the request of the Responsible, perform a legal, accounting or any other type of audit that requires knowing the personal data.

In this regard, the Owner accepts that their personal data are transmitted in accordance with this section.

In all cases the Responsible will inform the third parties of the content of this privacy notice.

Except as provided in this document and in Article 37 of the Law, we undertake not to transfer your personal information to third parties without your consent as well as to carry out this transfer in the terms established by the aforementioned Law.

VIII.- Changes to the privacy notice.

This Privacy Notice may suffer modifications, changes or updates derived from the new legal requirements; of our own needs for the products or services we offer; of our privacy practices; of changes in our business model or for other reasons.

In the event that the Responsible requires modification of the content of this privacy notice, it will be made known to the Owner in order to obtain their consent regarding the new processing of their personal data, for which the privacy notice will be available to the Owner in the address indicated above.

The foregoing shall be carried out applying what is established in the Law itself, for the manifestation of the Owner's will, which shall apply only to the aspects of the processing of personal data other than those already consented to in this privacy notice.

IX.- Consent

Based on Article 8 of the Federal Law on Protection of Personal Data Held by Individuals, I agree to deliver to COMPANHIA GONEVO, S.A. de C.V, my personal data so they could be treated in accordance with the provisions of this privacy notice, which was provided to me before this date, for a timely and complete knowledge.

Also, I ACCEPT the transfer of my personal data to the subsidiaries and / or offices of the Responsible (Administradora Plaza Empresarial, SA de CV, Desarrollo Santa María Proyectos, SA de CV, Desarrollo Santa María Torre V, SA de CV, Desarrollo Santa María Projects Torre Norte, SA de CV, Administradora JCO, SA de CV, among others) in accordance with this privacy notice

Finally I state that none of the personal data that is treated in this documents, is considered by myself as data that may affect me in intimate aspects or that may lead to discrimination or represent me a risk.

Date of update: October 5, 2018