

## COMPREHENSIVE PRIVACY NOTICE

Cometa Energía, S.A. de C.V. and its affiliated companies (hereinafter "Saavi Energía"), with its registered address at Boulevard Miguel de Cervantes Saavedra 301, Torre Norte, 11th Floor, Colonia Granada, Miguel Hidalgo, C.P. 11520, Mexico City, Mexico; provide this Privacy Notice to inform you about what personal data we collect and how it is processed, in accordance with the Federal Law on Protection of Personal Data Held by Private Parties and its corresponding Regulation (hereinafter, the "Applicable Law").

In the event that you are a *visitor and/or supplier* to any of our facilities, our website, *or due to business or legal relations with Saavi Energía*, Saavi Energía may request, as applicable and without limitation, personal data that may include, depending on the existing relationship between Saavi Energía and you: identification, contact, tax, economic, financial, employment, academic data, third-party data (emergency contacts or personal references), health data, union affiliation, such as: name, reason for your visit and/or person you are visiting; image (as we have Closed-Circuit Television (CCTV)); name, date and place of birth, marital status, gender, address, telephone number, email, Federal Taxpayer Registry (R.F.C.), Unique Population Registry Code (C.U.R.P.), signature, among others, as well as employment and academic background, bank account information, contact data for personal and emergency references, etc.

The aforementioned data, listed in an illustrative manner, will be collected solely for the purpose of managing the existing legal relationship between you and Saavi Energía (which may include commercial, business, contractual, labor relationships, among others) and will not be transferred to third parties, except when required by law or expressly authorized by the owner of the personal data.

If you are one of our *candidates*, the personal data we collect belongs to the following categories, listed in an illustrative manner, as follows:

- Identification and Contact Data: full name, date and place of birth, nationality, marital status, gender, address, landline and mobile phone numbers, email, R.F.C., Social Security Number, C.U.R.P., photograph and image, signature, customs and practices. Please note that some of your personal data (from the aforementioned category) may be obtained from publicly accessible sources.
- Employment Data: resume, employment history, job references, previous position, and salary.
- Academic Data: academic certificates, educational history, language and computer skills, educational level, skills.
- Third-Party Data: identification and contact data of individuals designated for personal and employment references.

If you become a *final candidate*, Saavi Energía may also collect the following sensitive personal data listed, without limitation, below:

- Health data: health status, allergies, physical characteristics.
- Union affiliation



As a *candidate*, the personal data collected will be used for the following purposes, which are necessary to consider you for a vacancy at Saavi Energía:

- > Conduct the recruitment and selection process, including interviews.
- > Perform evaluations for hiring.
- Prepare a job offer.
- > Request or verify personal, academic, and employment references.
- > Maintain communication with the candidate.

At certain times, we may request that you provide original documents and copies of certain documents to verify the information you have provided. Additionally, we may request a third party to verify this information and the documents provided. If your profile does not match the vacancy you applied for, we will retain your personal data for one year in case another vacancy suits your profile. After this period, your data will be securely deleted.

If you are one of our **employees**, Saavi Energía may collect the same information as in the case of **candidates** and **final candidates**, as well as:

• Financial Data: bank account, credit or debit card number, results of socioeconomic studies.

Similarly, if you are an *employee*, Saavi Energía may collect information considered Sensitive Personal Data as defined by the Applicable Law, which may include: personal data that affects the most intimate sphere of its owner, or whose misuse may lead to discrimination or pose a serious risk to the individual. Sensitive data includes those revealing aspects such as racial or ethnic origin, current and future health status, genetic information, religious, philosophical, and moral beliefs, union affiliation, political opinions, sexual preference.

As an **employee**, your personal data and sensitive personal data will be used for the following purposes, which are necessary due to the employment relationship with Saavi Energía. In this regard, your personal data will be used for, among others:

- Preparing the employment contract.
- Training and development.
- Providing access to the building, parking, and other Saavi Energía facilities.
- > Complying with legal obligations, payroll management, payment of benefits, salaries, bonuses, reimbursements, pensions, insurance, fuel or grocery vouchers. Business travel arrangements.
- Registering you as an employee and assigning a company email, preparing your company ID, assigning an employee number, and providing work tools.
- Requesting personal and employment references.
- > Including you in Saavi Energía's communication, training, development, and recognition plans.
- Conducting studies, analyses, or reviews to ensure workplace safety and confidentiality of Saavi Energía's proprietary information. For these purposes, Saavi Energía may conduct random checks of information on company computers and other devices provided as work tools.
- Investigating violations of laws and Saavi Energía's policies and plans.
- Contacting emergency contacts.
- Conducting socioeconomic, medical, and psychometric studies.
- Make publications of Saavi Energía events internally.



We may request original documents and copies of certain documents to verify the information you have provided. We may also request a third party to verify this information and the provided documents.

For any of the scenarios mentioned above, Saavi Ennergpia will apply the following:

## √ Personal Data Transfers

Saavi Energía may transfer your personal data to controlling companies, subsidiaries, other group companies, and third parties such as insurers, service providers, among others, either within or outside the national territory, solely for the purposes described. Saavi Energía may transfer your personal data as specifically provided by the Applicable Law and/or any other legislation that may apply.

## ✓ Personal Data Security

Saavi Energía ha implementado y mantiene diversas medidas de seguridad, tanto físicas y administrativas como tecnológicas, que nos permiten proteger sus datos personales, que coadyuvan para garantizar su inmutabilidad, así como prevenir su pérdida o el uso, acceso o tratamiento no autorizado. Entre las medidas de seguridad que Saavi Energía implementa se encuentran las siguientes: Saavi Energía has implemented and maintains various security measures, including physical, administrative, and technological safeguards, to protect your personal data, ensuring its integrity and preventing unauthorized use, access, or processing. The following security measures are among the ones that Saavi Energía implements:

- Access Monitoring: Saavi Energía conducts continuous and complete monitoring of all technological infrastructure in both corporate and production environments at every Facility. The monitoring is conducted through a dedicated Security Operations Center (SOC).
- **Security Data Backups:** In Saavi Energía we ensure the legitimacy of all software used, with licensed support that allows to make reliable backups. These security copies are made ensuring that all disaster recovery and business continuity requirements are reliable.
- Cifrado en reposo Saavi Energía utiliza algoritmos de cifrado AES de 256 bits para proteger los archivos en reposo. De la misma forma toda nuestra infraestructura, la nube que utilizamos y los dispositivos finales de los usuarios de Saavi Energía requieren cifrado en reposo obligatorio sin excepción.
- **Encryption at Rest:** Saavi Energía uses AES 256-bit encryption algorithms to protect files at rest, including all infrastructure, cloud, and user devices.
- Encryption in Transit: All data transferred to, from, and within Saavi Energía's infrastructure is encrypted. This includes the transfer of personal data, as well as all types of data flows within our network. External connections to Saavi Energía are only allowed through encrypted protocols, and HTTP links that are not encrypted are strictly for internal use and never exposed to the internet or external networks, except as redirects to HTTPS. All connections must comply with Saavi Energía's TLS/SSL policy:
  - o TLS 1.3 preferred
  - o TLS 1.2 mandatory
  - o TLS 1.0 not allowed
  - SSLv1, 2, 3 not allowed
- Physical Security Access to all our Corporate Office and Plants is controlled and monitored. All our operational sites are equipped with CCTV systems operating 24 hours a day, 7 days a week, 365 days a year. Access is only possible with a credential issued by Saavi Energía. The credential grants access solely to designated areas, ensuring that only the necessary personnel have access, with restricted entry to areas where only authorized personnel may enter.



If you wish to know the full extent of the measures adopted by Saavi Energía, please submit your request via email to privacidad@saavienergia.com.

## ✓ Your Rights:

As the owner of personal data and sensitive personal data, you have the right to Access your data; Rectify or update it; Cancel it, which would result in its removal from our databases; and Oppose its processing (hereinafter, the "ARCO Rights"). You may also limit the use and disclosure of your data or revoke the consent you have granted for its processing.

To exercise any of these rights, you must submit your request in accordance with the terms established by the Applicable Law. The request must be submitted either physically at the address provided at the beginning of this notice or via email to <a href="mailto:privacidad@saavienergia.com">privacidad@saavienergia.com</a>. If you have any questions regarding the procedure and requirements for exercising your ARCO Rights, please contact us at the aforementioned email address.

Saavi Energía reserves the right to make changes to this Privacy Notice from time to time, with the understanding that the updated version will always be available at our facilities and on our website <a href="https://www.saavienergia.com">www.saavienergia.com</a>.