

Personal Data Protection Policy

OBJECTIVE

To establish the internal guidelines and mechanisms for the handling, protection, and safeguarding of personal data held by Nuvoil, guaranteeing the privacy rights of the data subjects in accordance with the provisions of the Federal Law on the Protection of Personal Data Held by Private Parties (LFPDPPP) and its regulations.

SCOPE

This policy applies to all employees, suppliers, and third parties taking part in activities that involve the processing of personal data, whether as data controllers or data processors, within all companies that make up Nuvoil.

DEFINITIONS

- **Personal Data:** Any information concerning an identified or identifiable natural person.
- **Sensitive personal data:** Data that impacts the most private aspects of the data subject, such as ethnic origin, health status, religious beliefs, etc.
- **Data subject:** The natural person to whom the data pertains.
- **Controller:** The natural or legal person who decides on the processing of the data.
- **Processor:** The person who processes data on behalf of the controller.

GUIDING PRINCIPLES FOR DATA PROCESSING

All personal data must be processed in accordance with the principles of lawfulness, consent, information, quality, purpose, loyalty, proportionality, and

responsibility, as established in the LFPDPPP.

INTERNAL ROLES AND RESPONSIBILITIES

- **Legal Department:** Coordinate regulatory compliance, review contracts, and communicate with the INAI or the relevant authority.
- **IT Department:** Implement technical security measures (access controls, encryption, backups).
- **Human Resources:** Manage employee records, ensure the signing of privacy notices and NDAs.
- **Users with Access to data:** Must comply with this policy and safeguard the information under their control.

DATA PROCESSING LIFE CYCLE

- **Collection:** Only the necessary and relevant data should be collected.
- **Use:** Limited to the purposes informed in the Privacy Notice.
- **Conservation:** For the period necessary to fulfill the stated purposes and legal obligations.
- **Removal:** Secure removal through permanent deletion or physical destruction.

SECURITY MEASURES

- Control of logical and physical access.
- Encryption of sensitive media and communications.
- Regular database backups.
- Policies regarding the use of personal and portable devices.

ARCO RIGHTS

Data subjects are guaranteed the right to Access,

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Rectification, Cancellation, and Opposition regarding their personal data. Requests must be submitted to the email address: aviso.privacidad@nuvoil.com.

The data controller will respond within a maximum of 20 business days. Personal data will only be transferred to third parties when the data subject has authorized it or when expressly permitted by law.

Nuvoil will not be obligated to cancel personal data when:

- I. It relates to parties in a private, social, or administrative contract and is necessary for its development and fulfillment;
 - II. It must be processed by legal mandate;
 - III. Its cancellation would hinder judicial or administrative proceedings related to tax obligations, criminal investigations and prosecutions, or the enforcement of administrative sanctions;
 - IV. It is necessary to protect the legally safeguarded interests of the data subject;
 - V. It is required to perform an action in the public interest;
 - VI. It is necessary to fulfill a legal obligation acquired by the data subject; and
- It is processed for the purpose of medical prevention or diagnosis, or the management of health services, provided such processing is carried out by a health professional subject to a duty of confidentiality.

SECURITY INCIDENTS

Any unauthorized access, loss, or leak of personal data must be reported immediately to the IT and Legal departments. The incident will be followed up according to the INFORMATION SECURITY INCIDENT RESPONSE procedure.

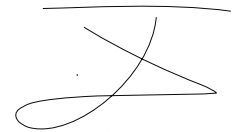
DATA TRANSFERS

Data transfers are only permitted when:

- There is consent from the data subject.
- They are necessary under a contract.
- They are carried out by authorities in accordance with the law.
- Third parties must assume the same obligations of confidentiality and security.

RELATIONSHIP WITH THE PRIVACY NOTICE

This policy complements Nuvoil's Privacy Notice, available at: <https://nuvoil.com/wp-content/uploads/2021/08/Aviso-de-privacidad-nuvoil-2.0julio-2021.pdf>

A handwritten signature in black ink, appearing to read "José Edel Álvarez Delong".

José Edel Álvarez Delong
CEO
Nuvoil Business Group