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Privacy and Personal Data Protection Policy

1. Objective

AXTEL, S.A.B. of C.V. (hereinafter "Axtel"), as part of its social responsibility, considers the safeguarding, proper use and protection of personal data.

The objective of these guidelines is to validate and ensure Axtel's commitment to protecting and properly using personal data information in accordance with the provisions of the Federal Law on the Protection of Personal Data Held by Private Parties and its regulations. This, based on the guiding principles and duties regarding the Protection of Personal Data in accordance with its internal policy.

Axtel, located at Av. Múnich 175, Col. Cuauhtémoc, San Nicolás de los Garza, Nuevo León, México, C.P. 66450, holds responsibility for processing your personal data.

Axtel is committed and obligated to have the tools in place to authenticate and assure compliance with the principles and duties regarding personal data protection.

2. Scope

These guidelines apply and are mandatory to all Axtel employees involved in the processing of personal data. That is, for those who have access to and utilize the owners' personal data gathered while performing their functions.

As responsible of your personal data, Axtel respects your right to privacy and data protection and guarantees that your personal data information is protected in accordance with the administrative, technical, and physical security rules required by law. This fulfills its obligation to protect against potential damage, loss, alteration, or unauthorized access.

These guidelines align with the legal and regulatory framework, which refers to the Federal Law on the Protection of Personal Data Held by Private Parties (hereafter referred to as the "LFPDPPP" for its Spanish acronym) and its Regulations.

Axtel processes personal data in accordance with the LFPDPPP's guiding principles, which include legality, loyalty, information, consent, purpose, proportionality, quality, and responsibility.

In addition to the mentioned principles, Axtel adheres to the duties of 1. Security, which protects the owners' personal data throughout its life cycle, and 2. Confidentiality, which guarantees the level of secrecy of the information and its treatment to prevent its unauthorized disclosure when stored or in transit.

3. Axtel link

Axtel has a Department Responsible for the Protection of Personal Data, which is led by the DPO (Data Protection Officer), who promotes the protection of personal data throughout the organization.

This area is in charge of formulating and implementing internal policies, processes, and guidelines. Additionally, it manages the practice of ARCO rights, oversees the processing of Personal Data Protection, Contractual concerns, supervises and advises on training issues, and analyzes compliance criteria for the company and third parties in line with the LFPDPPP and its regulations.

This guarantees and demonstrates the operation and compliance of its internal policy to both the data owner and the National Transparency Institute.

4. Privacy Notice

As part of its actions to comply with the information principle and, although the consent of the owner is not required for the processing of their personal data, AXTEL has a comprehensive privacy notice and its corresponding simplified privacy notice for each process in which personal data is processed.

The forms for creating comprehensive and simplified privacy notices are consistent with the features stipulated by the LFPDPPP, its regulations, and the National Institute of Transparency, Access to Information, and Personal Data Protection's General Guidelines (INAI).

Axtel provides a design for integrating and preparing privacy notices to enable data owners to understand them more easily. Axtel assures that the information in privacy notices is written in a simple, clear, and understandable language. Owners may at any time request guidance from the department of the data protection officer or Data Protection Officer.

5. ARCO rights

Axtel, as part of its responsibilities for personal data protection, has implemented a system to process any request from it or the owner for access, rectification, cancellation, opposition (ARCO rights) as well as to limit the use/disclosure or request revocation of consent for your personal data.

Axtel, through the department of the data protection delegate or Data Protection Officer, is responsible for transferring requests for the exercise of ARCO rights that are presented to those areas that, according to their powers or functions, may or should possess the personal data, to respond within the deadlines and terms established in the LFPDPPP.

Axtel takes the appropriate measures to guarantee that ARCO Rights holders are effectively carried out, in accordance with the principles, duties, and obligations regarding personal data protection.

For greater clarity, Axtel could receive requests from holders, either directly at its home or electronically, and once the necessary procedures are completed, responses to ARCO

Requests are delivered to the data holder or its legal representative, depending on the type and/or document in question in each case.

6. Transfer and Submission of Personal Data

Axtel does not facilitate the transfer of personal data. In this instance, it will only be carried out if there is a formal relationship established through a legal instrument signed with the owner, i.e. through written Consent.

Axtel manages the referral by formalizing the legal act. That is, the person in charge must process personal data in the name and on behalf of Axtel within the scope of the duly formalized service provision and without having any decision-making power over the scope and content of the processing, limiting its actions to the terms established by Axtel.

7. Axtel Mechanisms to Assure Personal Data Protection

In accordance with the LPDPPP's guiding principles and duties for personal data protection, Axtel conducts the following measures.

- **TRAINING**
 - ✓ Personal data protection courses
 - ✓ Internal communication
 - ✓ Diverse advertising
 - ✓ Clean workplaces
 - ✓ Mechanisms for reporting possible vulnerabilities.
- **TECHNICAL CONTROL**
 - ✓ System access profiles
 - ✓ System access passwords
 - ✓ Hardware control
 - ✓ Information loss prevention functions
- **CRISIS MANAGEMENT**
 - ✓ Report any potential privacy incidents through the crisis response mechanism
 - ✓ Be aware of information security policies and guidelines.
- **AUDITS**
 - ✓ Verify that the organization's data protection policies are being followed.

These measures and/or mechanisms will be monitored by the department of the data protection delegate or Data Protection Officer, as well as the areas in responsible for managing these operations, to guarantee compliance with our internal policy.

8. Measures.

Axtel's Data Protection Officer department implements disciplinary measures inside the organization to prevent noncompliance with the provisions of its internal policies, guidelines, and processes.

The content of this document may be modified, changed, or updated in response to new legal requirements, our own needs for the products or services we provide, our privacy practices, changes in our business model, or other factors.

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