

COMPREHENSIVE PRIVACY NOTICE FOR SPORTS CENTERS CLIENTS AND USERS

As per the provisions from the Federal Law on the Protection of Personal Data Held by Private Parties (“the Law”), its Regulations, and the rest of the regulatory provisions applicable to handling personal data, we hereby issue this Comprehensive Privacy Notice to inform you about the terms under which we will handle your personal data. This includes identifying the entity responsible for your information, the purposes or actions that justify the collection, use, and safeguarding of your personal data, the third parties to whom your personal data will or may be transferred to, the mechanisms available to you for exercising your rights, among other information that will allow you to make informed decisions about the use of your personal data.

1. Who is responsible for your personal data?

Swimming and Sporting Club, S.A. de C.V. (hereinafter, the “Data Controller”) is the party responsible for handling your personal data. Our address for receiving notifications is at Campos Elíseos number 400, Col. Lomas de Chapultepec, Alcaldía Miguel Hidalgo, C.P. 11000, Ciudad de México, México.

2. What data do we use and what can we request?

1. Identification data.
2. Contact information.
3. Location data.
4. Financial and/or asset data.
5. Legal status data.
6. Sensitive personal health data.

3. Treatment of sensitive data.

We inform you that we process your personal health data to assess your medical condition for the use of the services provided at the sports center, as well as to provide any necessary medical attention for you.

Likewise, in case of any emergency or accident within the Data Controller's facilities, your sensitive personal health data shall be handled to provide you with the support required based on the corresponding event.

If you provide third-party personal data (such as other sports center service users) to the Data Controller, upon providing said information you hereby represent that you have obtained prior consent from these third parties to share their information with the Data Controller, and that said information provided is both accurate and complete.

4. Reasons for Handling Personal Data.

Primary Purposes:

1. Providing you with reports regarding the services provided by the Data Controller.
2. Identifying you as a client of the services provided in the sports service.
3. Verifying your identity, and, if applicable, what kind of person you are.
4. Creating the document(s) that establish the legal relationship with the Data Controller and/or indicate the obligations between the parties.
5. Documenting, monitoring, fulfilling, and enforcing obligations contracted with you.
6. Locating you to ensure compliance with contractual obligations; monitor the payment status of contracted services, as well as manage, administer, and execute collection activities.
7. Issuing and sending documents that evidence the execution of obligations related to the legal relationship.

8. Contacting you to communicate situations related to the legal relationship with the Data Controller.
9. Evaluating your medical condition to use the services provided at the sports center, as well as to provide any necessary medical attention for you.
10. Having documentary, photographic, or audiovisual evidence of your participation.
11. Preparing reports related to the activities conducted with the Data Subject
12. Statistics and historical record of activities carried out with the Data Subject.
13. Sending physical or electronic documentation, as well as managing and monitoring such shipments.
14. Providing the necessary assistance if you contact via telephone, email, instant messaging, social media, or other communication means established by the Data Controller, as well as providing attention and follow-up to requests made to the Data Controller.
15. In case of an accident or medical emergency, on the premises of the Data Controller, to provide the required assistance and contact the person indicated by the Data Subject to inform them of the incident.
16. While on the premises of the Data Controller, through the video surveillance system, to ensure the safety of individuals and the facilities of the Data Controller, as well as to be able to identify individuals related to situations that may compromise any legal interest.
17. Complying with the guidelines and legal provisions regulating the Data Controller.

Secondary Purposes:

1. For advertising, promotional, or marketing purposes.
2. Sending you information about our products, services and/or promotions.
3. Inviting you to events organized by the Data Controller.
4. Sending you newsletters, press releases, news, and/or the Data Controller's newsletter.
5. Contacting you to express gratitude for your preference.
6. Creation, production, editing, and internal or external communication of documentary, photographic, or audiovisual evidence documenting your participation.

If you do not want your personal data to be handled for any or all of the additional or secondary purposes, from this moment you can notify us by sending an email to the address datapersonales@mm.gmexico.com.

The refusal to use your personal data for secondary purposes is not a reason to deny the requested services or terminate the established relationship with us.

For cases in which personal data is obtained indirectly, within 5 (five) business days from the first contact with the Data Controller, the Data Subject may express his/her refusal for the Data Controller to handle the Data Subject's data by sending an email to the direction datapersonales@mm.gmexico.com.

5. Who can we share your data with?

Your personal data may be transferred within the national territory or abroad, to the following categories of recipients and for the purposes identified below, as well as those indicated in the previous section:

1. **Our parent companies, subsidiaries, and/or affiliates, and/or any company within the same corporate group as the Data Controller** that operates under the same internal processes and policies, for sharing the execution of primary and secondary purposes, as well as for statistical and historical record-keeping purposes. Your consent is not required for this transfer.
2. **Institutions providing medical services** so they can provide support in case of accident or medical emergency while physically present at the Data Controller's facilities. Your consent is not required for this transfer.

3. **Insurance institutions** so they can provide support in case of accident or medical emergency at the Data Controller's facilities and, if necessary, notify claims and manage insurance payments. Your consent is not required for this transfer.
4. The **person designated by the Data Subject** to inform them of any emergency related to you. Your consent is not required for this transfer.
5. **Competent authorities** to comply with their requests upon duly founded and motivated request. Your consent is not required for this transfer.
6. **Providers of instant communication tools and social media** for the exchange of written and/or voice communication. Your consent is not required for this transfer.
7. **Providers of tools for monitoring and tracking** activities conducted with the Data Subject. Your consent is not required for this transfer.
8. **Courier and parcel delivery companies** for the dispatch and delivery of information. Your consent is not required for this transfer.
9. **External auditors** so they can perform and prepare audits conducted on the Data Controller. Your consent is not required for this transfer.
10. **Banking institutions** to make payments. Your consent is not required.
11. **Social media companies or mass media** for the communication of evidence of event execution. Your consent is necessary.

If you do not wish your personal data to be transferred regarding those transfers for which your consent is necessary, you can express this as of the availability of the privacy notice, or alternatively, we request that you send an email to datapersonales@mm.gmexico.com.

6. ARCO Rights.

You have the right to exercise your rights of Access, Rectification, Cancellation, or Opposition (ARCO) on your personal data. Please note that the ARCO Rights include:

- **Access:** the right to know what data we have about you and how we use or share it.
 - **Rectification:** the right to request the rectification of your data at any time if, for any reason, it is incorrect, inaccurate, or incomplete in our databases.
 - **Cancellation:** the right to request the deletion of your information, from its blocking to its subsequent permanent removal.
 - **Opposition:** the right to indicate a legitimate reason for us to stop using your personal data.
- a) **Media.** If you wish to exercise your rights of access, rectification, cancellation, or opposition (ARCO rights) regarding your personal data, you or your legal representative must submit a request addressed to our Personal Data Department by sending an email to the following address: datapersonales@mm.gmexico.com.
 - b) **Personal Data Department.** Your requests will be processed by our Personal Data Department located at Campos Elíseos número 400, Col. Lomas de Chapultepec, Alcaldía Miguel Hidalgo, CP 11000, Mexico City, Mexico. Please, direct any communication to: datapersonales@mm.gmexico.com.
 - c) **Procedure.** If you wish to exercise your rights of access, rectification, cancellation, or opposition (ARCO rights) regarding your personal data, you may submit an "ARCO Rights Request" following the format defined by the Data Controller. We ask you to request it by emailing datapersonales@mm.gmexico.com. Otherwise, you may submit a free-format request, which should at least include:
 - i) Your full name and address, or another means to communicate the response to your request;
 - ii) A copy of an ID document (please see the list of documents supported in section "d) Documents to verify the identity of the Data Subject").

- iii) If making the request through a representative, the representative's name, and documents to verify their identity and authority. (Please see the list of documents supported in section "e) Documents to verify the identity and authority of the legal representative").
- iv) A clear and accurate description of the personal data for which you wish to exercise the corresponding right, as well as information related to it.
- v) Specific requirements for each type of right to be exercised:
 - a. Right of access: We ask that you specify the manner in which you prefer the requested personal data to be reproduced, for example, the delivery of a simple copy, delivery of a copy in electronic media, or sending to an email.
 - b. Right of Rectification: We ask that you specify the modifications you request to be made to the personal data and provide supporting documents for the request.
 - c. Right of Cancellation: We ask that you specify the reasons motivating the request for the deletion of data from the files, records, or databases of the Data Controller.
 - d. Right of Opposition: We ask that you specify the reasons or situation leading you to request the termination of the handling of your personal data, as well as the harm or damage that would be caused if such handling continues; or alternatively, you must indicate the specific purposes for which you wish to exercise this right.
- vi) Any other information you consider important to address your request or locate your personal data.

If the received request is insufficient or incorrect for handling, or if the indicated documents are not attached, the Data Controller will have a period of 5 (five) business days from receiving the request to request you, only once, to provide the necessary elements or documents to handle it. You will have a period of 10 (ten) business days to address the requirement, as of the day following the receipt of the request. If no response is given within this period, the corresponding request will be considered as not submitted.

If the request is properly completed, along with the required documentation, the Data Controller shall communicate to the Data Subject the decision adopted regarding the request within a maximum period of 20 (twenty) business days from the date the access, rectification, cancellation, or opposition request was received. If the request is deemed valid, the Data Controller shall implement the decision within a maximum period of 15 (fifteen) business days as of the notification of the decision. The aforementioned deadlines may be extended by an equal period when the circumstances of the case justify it.

The decision adopted by the Data Controller resulting from the exercise of ARCO rights will be sent by email (or to the address provided for this purpose in your request).

The exercise of the rights indicated here will be free of charge; however, for the exercise of the Right of Access, the Data Subject will only need to cover, if applicable, the shipping costs or the cost of reproducing copies or other formats. Likewise, for the exercise of the Right of Access, the Data Controller will deliver the personal data according to the modality indicated by you.

Keep in mind that your identity and, if applicable, that of the representative, as well as the representative's authority, must be duly proven prior to exercising the relevant right, if applicable, by presenting the original documents mentioned above or a certified copy of them, for verification purposes.

The exercise of ARCO rights may be denied in the following cases:

- i. If you are not the Data Subject of the personal data, or the legal representative is not duly accredited for it.
- ii. When we cannot find your data in our databases
- iii. If the request violates the rights of a third party

- iv. If there is a legal impediment or a resolution from a competent authority that restricts access to personal data or does not allow rectification, cancellation, or opposition to them; and
- v. When rectification, cancellation, or opposition has been previously conducted.

Our denial may be partial, and in such cases, we will address your ARCO rights to the extent that is appropriate.

In all the above cases, we will explain the reason for our decision and communicate it within the established deadlines, using the same means by which you made your request.

d) Documents to verify the identity of the Data Subject:

To prove your identity, the following identifications will be considered valid:

- i) For Mexican citizens by birth or naturalization:
 - a. Valid voter identification card issued by the National Electoral Institute.
 - b. Valid passport.
 - c. Current professional license.
 - d. Valid ID card from the National Institute for Senior Citizens.
 - e. The identity of minors can be proven through their birth certificate, Unique Population Registry Code, identification cards issued by educational institutions or social security institutions, passport, or any other official document used for this purpose.
 - f. The identity of individuals under interdiction or declared incapacity by law can be proven through their birth certificate, Unique Population Registry Code, valid passport, or any other valid official document or identification issued for this purpose.
- ii) For foreigners:
 - a. Valid migratory document corresponding, issued by the competent authority (if applicable, migratory extension or renewal).

e) Documents to verify the identity and authority of the legal representative:

To verify the identity of the legal representative, the documents indicated in the immediately preceding section shall be considered valid. Verification of authority as a legal representative can be conducted through any of the following mechanisms:

- i) Simple power of attorney signed before two witnesses, attaching a simple copy of their official identifications.
- ii) Document signed by a Notary Public.
- iii) The Data Subject and their representative appearing to declare in person before the data controller.
- iv) For minors, authority is verified through the minor's birth certificate.
- v) ARCO rights requests for personal data of individuals under interdiction or legal incapacity:
 - a. Document verifying the identity of the Data Subject.
 - b. Legal instrument appointing a guardian.
 - c. Official identification of the guardian.
 - d. Letter stating, under oath, that they exercise guardianship and are not within any of the legal scenarios for its suspension or limitation.

7. Do you want to revoke your consent or limit the use of your data?

You have the right to revoke your consent for the handling or transfer of your personal data; this revocation may render us unable to provide you with our services. If there are reasons of public interest or legal obligations, we may deny the revocation of your consent for certain purposes.

If you revoke your consent, and such revocation is valid, we will cease handling your personal data for the purposes indicated in this Privacy Notice that are valid or expressly requested. Notwithstanding the above, revoking your consent does not guarantee that third parties who have had access to your personal data will immediately cease handling it, nor in the future, as they may use your information for their own purposes and under their own privacy notices.

You may send your request for revocation of consent to datospersonales@mm.gmexico.com, following the instructions applicable to the exercise of ARCO Rights.

You can also limit the use or disclosure of your personal data by directing the corresponding request to our Personal Data Department. The requirements to prove your identity, as well as the procedure to address your request, will be the same as those indicated for the exercise of ARCO rights.

We have means and procedures to ensure the inclusion of some of your data in our own exclusion lists when you expressly request their inclusion. In such cases, we will provide the requesting Data Subjects with the corresponding registration certificate.

8. Cookies.

On our website and forms, we use cookies and other means that allow us to collect information when you visit and navigate through it.

The cookies used by the Data Controller allow us to collect, analyze, and store electronic information related to your browsing habits and the use of our communication channels and forms. Cookies enable the automatic collection of information at the very moment the user uses our website and our online services (such as chatbots).

For more detailed information about cookies and how you can disable them based on your browser and operating system, we recommend visiting the site www.allaboutcookies.org, which explains how to disable them step by step.

However, please be aware that if you disable cookies or prevent their installation, you may not be able to use some functions of our website fully or correctly.

9. Changes to the Privacy Notice.

We may modify, update, extend, or otherwise change the content and scope of this Privacy Notice at any time and at our sole discretion. Updates to this Privacy Notice will be published on our website on the internet. At any time, you can request the latest version of this Privacy Notice from our Personal Data Department, through the email address datospersonales@mm.gmexico.com. When legally applicable and if we have your email address, we may communicate changes to this Privacy Notice through that means of communication.

If you have accessed this Privacy Notice electronically or if you wish to express your refusal for the handling of your data for secondary purposes, you can communicate this decision at any time through the established means for the exercise of your ARCO rights.

10. Questions or clarifications.

If you have questions or clarifications about this Privacy Notice, you can contact our Personal Data Department via datospersonales@mm.gmexico.com.

**Last Update:
March 28, 2023.**