



# Global Policy for the Protection of Personal Information

Compliance Department

FGB-ECP-01

## 1. Purpose

To regulate the legitimacy of the processing of personal information in Grupo Bimbo, in order to guarantee privacy and prevent unauthorized access.

## 2. Scope

The scope of application of this policy is extended to all entities and Business Units of Grupo Bimbo, for the proper processing of the personal information of its applicants, associates, suppliers, customers and consumers.

## 3. Definitions

**Holder:** The natural person to whom the personal information corresponds.

**Privacy Notice:** Physical, electronic or any other format generated by the Compliance Department that is made available to the holder, prior to the processing of their personal information.

**Databases:** An ordered set of personal information relating to an identified or identifiable person.

**Consent:** Statement of the will of the data owner by means of which the treatment thereof is carried out.

**Personal information:** Any information concerning an identified or identifiable natural person.

**Sensitive personal data:** That information that affects the holder's most intimate realm, or whose improper use may give rise to discrimination or entail serious risk to the holder. Specifically, any information that may reveal aspects such as racial or ethnic origin, present and future health status, genetic information, religious, philosophical and moral beliefs, trade union affiliation, political opinions, or sexual preference is considered sensitive.

**ARCO Rights:** By their initials, they are the following:

- Access - The holders can access their personal data held by the person responsible, and may know the privacy notice to which their treatment is subject.
- Rectification - The owners can rectify their personal information when it is inaccurate or incomplete.
- Cancellation - The owner will have at all times the ability to cancel his or her personal information.
- Opposition - The owner may oppose the processing of his or her personal information, in which case the person responsible cannot make use of it.

**Treatment:** Collection, use, disclosure, or storage of personal information by any means. The use covers any action of access, handling, use, transfer, or disposition of personal information.

**Transfer:** Any communication of data provided to persons other than the person in charge of the processing.

## 4. Responsibilities

**Compliance Vice President:** To establish procedures for the receipt, processing, follow-up, and timely attention of the requests made by the information holders. To supervise and disseminate the internal procedures, to comply with the activities and database life cycles of those natural persons in question, according to that stipulated in this policy and in any applicable procedures, as well as to ensure their observation and compliance. To support the Grupo Bimbo Entities and Business Units in responding to



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requests by the information holders to exercise their ARCO rights, which are defined herein, as well as to execute the decisions of the Ethics Committee.

**Ethics and Compliance Committee ("Ethics Committee"):** To dictate measures for the correct execution of this policy and to approve, on a case-by-case basis, those situations that, according to this policy, require express authorization from the Company.

**Business Unit and Functional Directors:** Implement this policy and comply with the provisions of internal procedures and other applicable legal provisions on data protection in the countries where they operate, as well as designate a responsible person to be the link with the Compliance Department.

### 5. General Aspects

The guidelines to which the Entities and Business Units of Grupo Bimbo are subject as owners of the files and databases of natural persons are the following:

#### Legality

- They must collect and process the personal information of clients, suppliers and associates in a licit manner in accordance with the applicable regulations.
- It is prohibited to obtain this information through deceitful or fraudulent means.
- They must use all personal information provided to Grupo Bimbo Business Units and Entities, as agreed with the owner in the privacy notice and other applicable normative devices.

#### Informed consent

- It is mandatory to disseminate the privacy notices, informing the customers, suppliers and associates of the information that is collected from them and the purpose with which it is collected.
- Said notice must be made available to the holders through the formats established by the Compliance Department.
- Consent to privacy notices may be express or implied, in accordance with the applicable legal provisions regarding data protection in the countries where they operate and the present policy.

#### Proportionality

- They will only collect personal information that is necessary for the functions performed and the processing thereof must be justified.
- They must support and justify the purpose and processing of the information collected, in the privacy notice, and said purpose must be necessary and adequate.
- They must stipulate in the contracts concluded with the suppliers, the clause of confidentiality and care of the personal information, approved by the Compliance Department.

#### Information

They must disclose the essential characteristics of the processing to which the personal information provided by the owners will be submitted, through the privacy notice.

#### Quality

- They have the obligation to keep up-to-date and correct the personal information of Grupo Bimbo's customers, suppliers and associates.
- They must limit the period of use of the information to the time strictly necessary. After this period, the data must be blocked for the sole purpose of determining possible responsibilities in relation to its processing, up to the legal or contractual prescription period to proceed with its cancellation.



- In case the information is no longer required for the purpose for which it was collected, they must delete said information from Grupo Bimbo's databases and systems, and record this procedure.
- The information regarding breach of contractual obligations must be eliminated within 72 (seventy-two) months from the failure to comply with all the Grupo Bimbo databases and systems, except in the case of contrary legal provision.

### **Responsibility**

- It is mandatory to establish administrative, technical and physical security measures to protect personal information against theft, damage, loss, alteration, destruction, use, access and unauthorized processing.
- They must take the necessary and sufficient measures to ensure that the privacy notice is respected at all times.
- They shall ensure the confidentiality of the personal information provided to them by the owners or by third parties.

### **Activities and procedures in which personal information is used**

- When managing information databases, taking into account the three sources from which data is obtained: "customers, suppliers and associates," they must identify each of the activities and/or procedures in which the processing of personal information is carried out.
- They should clearly differentiate databases containing personal information from those that also contain sensitive information.
- They must have a document that supports the identification of each of the databases they manage and the description of the personal and/or sensitive information they contain.

### **Flow of information**

Once they have identified the activities or procedures in which physical information is stored, they must have a document that supports the life cycle of said information in each of their activities, clearly identifying:

1. In which part of the activity the information is collected.
2. How they are obtained (either personally or directly from the holder, or indirectly by sources of public access or transfer).
3. Which departments and persons within each Entity or Business Unit treat personal information and for which of its functions.
4. In which activities and/or internal procedures is the personal information processed.
5. If in these procedures the transfer of the information to third parties outside Grupo Bimbo is required and effected.
6. For how long the personal information is kept.
7. The mechanisms for the updating and elimination of said information.
8. What measures are used for the safeguard and security of said information.
9. What types of data are collected and their purpose.

### **Consent**

- It is mandatory to obtain the express consent of the holders of the information for the processing of: sensitive data, financial and patrimonial data, when the purpose for using the information has changed, and when the information will be transferred to third parties outside Grupo Bimbo.
- In the express consent, they must obtain the signature of the holder, electronic signature, or any means authentication.
- They must keep, physically or electronically, the evidence that the owner of the information gave their express consent for the corresponding use.



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**6. Responsibility / Ownership.**

The Compliance Department is the assigned owner of this Policy and is primarily responsible for its content, updating and presentation for approval to the Internal Control Department, Steering Committee and CEO.