

Comprehensive Privacy Notice

This document is the Privacy Notice of Axtel, S.A.B., de C.V., its affiliates and subsidiaries (hereinafter "Axtel").

Axtel, in compliance with the information rule set forth in the Federal Act on the Protection of Personal Data Held by Private Parties (hereinafter the Act) Articles 8, 15, 16, 17, section II, 33, and 36; its Regulation Articles 14, 24, 26, 27, 28, 30, 40, 41, 42, 68, 90 and 102, and Privacy Notice Guidelines 10, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 37 and 41, informs you of the existence and main characteristics of the treatment to which your personal data will be subjected in accordance with the following.

Axtel respects your right to privacy and protection of personal data, sensitive personal data, including your financial or asset data; therefore, your information is duly safeguarded in accordance with the administrative, technical and physical security provisions established in the Act on the matter, to protect it from possible damage, loss, alteration or unauthorized access. Axtel, located at: Av. Munich 175, Col. Cuauhtémoc, San Nicolás de los Garza, Nuevo León, México, C.P. 66450, is responsible for the database that contains your information.

1. Personal data we will use.

Axtel, obtains the holder's personal data directly and/or through physical, electronic or face-to-face means, as well as from authorized public sources, in order to comply with the main and necessary purposes indicated in this Privacy Notice. The following Personal data will be processed according to the type of holder:

Axtel Networks is part of Axtel, S.A.B. de C.V. - Public Domain Information



- **Clients and/or Suppliers:** Identification data, tax data, contact data, financial and asset data. In the case of customers and/or suppliers, sensitive personal data is not processed.

- **Candidates, Employees and/or Professional Services:** Identification data, contact data, academic data, employment data, asset and financial data, data on physical characteristics and biometric data, and, as Sensitive Personal Data: ideological data, health data and racial and ethnic origin data.

For these purposes, health data refers to all information concerning an individual related to the assessment, preservation, care, improvement and recovery of their physical or mental health, present, past or future, as well as genetic information. In the event of a health emergency, if there is someone affected, in the absence of their prior written consent, Axtel must protect their identity, unless there is a justified reason determined by the human resources department to do so.

- **Contractors:** identification data, contact data, employment data, data proving the validity of social security rights or period of major medical insurance. Sensitive personal data is not collected.

- **Internet portal visitors:** identification data and contact data. No sensitive personal data is collected.

- **Access to the facilities:** identification data, contact data, if applicable, the company they represent and the reason for the visit. Sensitive personal data will not be processed.

Consent shall not be required for the processing of Personal Data when:

1. This is provided for by law;
2. The data is contained in publicly available sources;
3. The Personal Data undergoes a prior disassociation procedure;



4. For the purpose of fulfilling obligations arising from a legal relationship between the Holder of the Personal Data and Axtel;

5. When an emergency situation occurs that could potentially harm an individual's property or person;

In the case of sensitive personal data, consent for its processing will not be necessary when:

- it is necessary to comply with health, safety and risk prevention in workplaces in accordance with the Federal Labor Act, NOMs (Mexican Official Standards), and Axtel's internal regulations, policies and processes in order to handle serious emergency situations; or

- A resolution is issued by a competent authority.

In all cases, the purpose of sensitive personal, asset and financial data is for Axtel to comply with the obligations arising from the legal relationship established with the Holder. We are committed to processing your data under strict security measures, always ensuring confidentiality. If any type of personal data is provided related to another person as a reference, for the purposes of this privacy notice, you state and agree that you have obtained their corresponding prior consent for it.

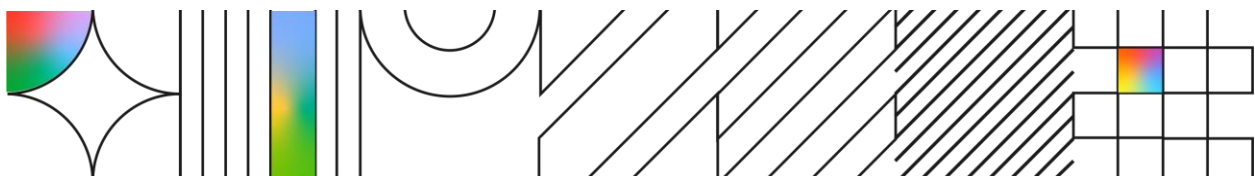
2. Purposes for use of your personal data.

The main and/or necessary purposes for which Axtel may request, obtain, store and/or use Personal Data by type of Holder are:

- Customers and Suppliers:

- o To verify and confirm your identity,
- o To prepare proposals and estimates for contracting and sending information by virtue of the commercial relationship,
- o To carry out the necessary formalities for the legal relationship,

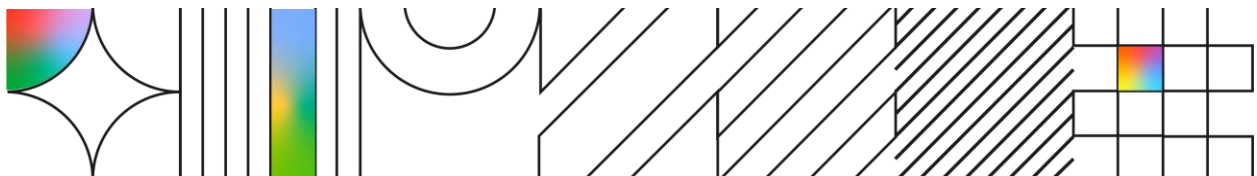
Axtel Networks is part of Axtel, S.A.B. de C.V. - Public Domain Information



- o To engage services needed to deliver the economic and in-kind considerations set forth in the agreements,
- o For statistical purposes, to prepare reports and update the database,
- o To carry out all the procedures with the corresponding authorities,
- o Management of payments and collection of contracted services, and
- o Evaluation of the quality and satisfaction of products and services.

- Candidates, Employees and/or Professional Services:

- o To verify and prove your identity,
- o To evaluate and internally check knowledge and skills for employment,
- o Human resources administration, talent management and to update the database and files,
- o To engage services for the delivery of the economic and in-kind considerations established in the agreements,
- o To carry out the necessary formalities for the legal relationship,
- o To communicate with their contacts when appropriate.
- o To carry out procedures with the corresponding authorities,
- o To keep track of occupational health programs,
- o To prepare documents, contracts, agreements, invoices, receipts, acknowledgments and in general any document related to the employment relationship,



- o To transfer data to health authorities: clearly documented. If there is a health emergency, Axtel may process health data in order to take the necessary precautions to protect and provide continuity of work activities.

- Contractors:

- o To monitor and control visits, as well as to allow access to the facilities.

- Internet portal visitors:

- o To respond to any request for information or service through the contact options available on our website.

- Access to our facilities:

- o To monitor and control visits, as well as allow access to the facilities.

Additionally, for any holder, Axtel, as a secondary purpose may request, obtain, store and/or use Personal Data for:

- The communication, marketing and distribution of our products and/or services through physical and electronic media.

If you do not want your personal data to be processed for these additional purposes, you may inform Axtel at that time. Under no circumstances will any Personal Data collected be used for any purpose other than those indicated herein, unless there is a change in this Privacy Notice.

3. Transfer of Personal Data (who we share it with).

Axtel does not transfer Sensitive Personal, Asset or Financial Data as part of processing personal data. If required, it will not be carried out without prior express written consent from the Holder, except for those specified in the purposes of use.



Personal Data may be lawfully transferred for the purposes set forth in this Privacy Notice to:

- a) Axtel's subsidiaries, affiliates, holding and/or controlled companies in Mexico or abroad,
- b) When the transfer is needed to provide the products and services or to comply with the contracted labor or commercial relations.
- c) To third parties for customer service and studies related to providing Axtel's products and services; and
- d) Third parties that work with Axtel in order to offer its products and services pursuant to the provisions of applicable regulations on Personal Data.

The Holder accepts that, by providing their Personal Data, they will be subject to the transfers mentioned in this Privacy Notice.

We inform you that for the indicated transfers, if you do not express your refusal, we will understand that you have given us your consent.

4. How to exercise your ARCO rights (access, correction, cancellation and opposition).

In order to process any request for access, rectification, cancellation, opposition, as well as to limit the use / disclosure or to request the withdrawal of consent to your personal data, you must send a written request to RH AXTEL Personal Data located at: Av. Munich 175, Col. Cuauhtémoc, San Nicolás de los Garza, Nuevo León, México, C.P. 66450 from Monday to Friday from 9:00 a.m. to 1:00 p.m. and from 3:30 to 6:00 p.m., on business days, as applicable. This request must contain and be accompanied by the following:

- a) The name of the Holder, address and/or any other means to inform you of the response to your request;
- b) Documents accrediting the identity or, as the case may be, the Holder's legal representation;

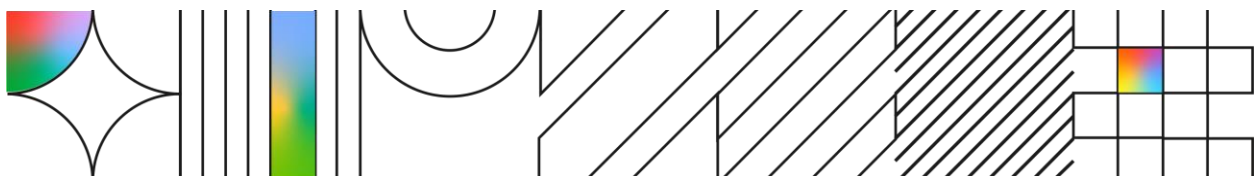


- c) A clear and precise description of the Personal Data for which it seeks to exercise any of the aforementioned rights;
- d) Any other item or document that facilitates the location of the Holder's Data, as well as their Tax code (RFC) and/or Unique Population Registration Code (CURP) to avoid any similar individuals.
- e) Clearly specify whether the request is for access, rectification, cancellation, opposition; to limit use/disclosure or to withdraw consent.
- f) The reason for the request and
- g) The modifications to be made, in case the request is for the rectification of Personal Data and provide the documentation supporting the request.

In the event that the information provided in the ARCO Request is erroneous or insufficient to process it, or if the documents required to process it are not provided, Axtel will ask the data holder or their representative, within 5 business days following the receipt of the ARCO Request, only once, to provide the items or documents required to process it. The data holder or their representative will have 10 business days from the day following receipt of the request to respond. Axtel will respond to the ARCO Request with the decision reached, within 20 business days from receipt of the request, or if additional information or documents have been requested, within 20 business days from the day following the submission of the response to the request.

If the ARCO Request is granted, Axtel will implement the decision reached within a period of 15 business days from the date the data holder or their representative is informed of the response. If it is for ARCO Requests regarding the right to access personal data, the delivery of such data will be made with prior confirmation of the identity of the data holder or their representative.

Axtel may extend the deadlines to respond to an ARCO Request, and/or to implement the decision reached, only once, for periods equal to those indicated in each case, provided that it considers that the circumstances of the case justify it. In such cases, Axtel will notify the data holder or their



representative, of the circumstance(s) that justify the extension, within each of the original deadlines to respond or to implement the decision reached.

Uncertified copies or electronic file of the responses to ARCO Requests will be delivered to the data holder according to the type and quantity of documents involved in each case.

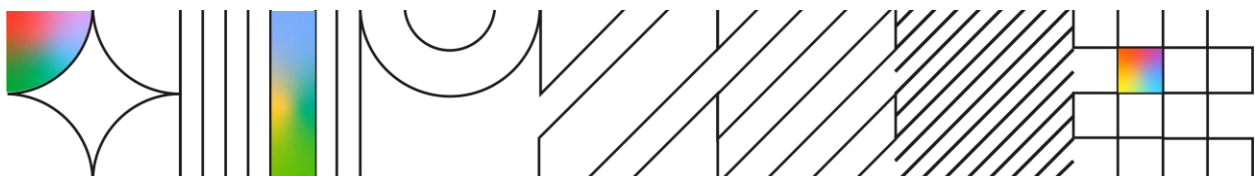
For the withdrawal of consent, it will be sufficient for the holder to submit their request at Axtel's address. Axtel will implement such request, as long as it is not personal data needed for the existence, maintenance and fulfillment of its legal relationship with the data holder.

Axtel may deny access, rectification, cancellation or opposition to data being processed, in the following cases:

- When the applicant is not the holder of the personal data, or the legal representative is not duly accredited to do so;
- When the applicant's personal data is not found in its database;
- When the rights of a third party are damaged;
- When there is a legal impediment, or the resolution of a competent authority that restricts access to personal data or does not allow the rectification, cancellation or opposition of such data;
- When the rectification, cancellation or opposition has been previously made.

5. How to withdraw your consent for the use of your personal data.

When applicable, you may withdraw the consent that you have given us to process your personal data. However, it is important to note that not in all cases we will be able to fulfill your request or terminate the use immediately, since it is possible that for some legal obligation, we may need to continue processing your personal data. Also, you should consider that, for certain purposes, the withdrawal of your consent will mean that we can no longer provide the service you requested, or the conclusion of your relationship with us. For the Holder to be able to express their refusal in this regard, they should contact Axtel through the established procedure to exercise ARCO Rights indicated in the previous paragraph.



6. How to limit the use or disclosure of your personal information.

In order to comply with the purposes of this Privacy Notice, Axtel is committed to have sufficient and necessary the legal and security measures to ensure that your Personal Data remains confidential and secure.

For the Holder to make a request to limit the use or disclosure, they must contact Axtel through the established procedure to exercise ARCO Rights indicated in Section V of this Privacy Notice.

7. The use of tracking technologies on our website.

We hereby inform you that we use cookies web beacons and other technologies on our website, which can be used to monitor your behavior as an Internet user, as well as to provide you with a better service and user experience when browsing our website.

A visitor can configure their browser to accept or reject by default all cookies or web beacons or to receive an on-screen notice of the reception of each cookie or web beacon and decide at that time whether or not to install it on their hard drive. The cookies or web beacons used on Axtel's websites do not provide references to determine the visitor's name and last name and cannot read data from your hard drive or include viruses in your texts.

If the Holder provides their Data through this medium, including Axtel's website (Internet), the Holder understands, accepts and acknowledges that:



a) Axtel's website may include links to third party websites, which, if accessed, will cause you to leave Axtel's website, therefore Axtel does not assume any responsibility regarding such third-party websites.

b) Axtel's website may include links to sites that manage social networks, in which case the Holder accepts that by providing any type of information or Data in such sites, this means such information or data may be read, viewed, accessed, retransmitted and processed by any person, and therefore releases Axtel from any responsibility.

8. Changes to the privacy notice.

This Privacy Notice may undergo modifications, changes or updates arising from new legal requirements; our own needs for the products or services we offer; our privacy practices; changes in our business model, or for other reason. We are committed to keeping you informed of the changes to this Comprehensive Privacy Notice through our webpage at: <https://www.axtelcorp.mx/aviso-de-privacidad/>

Last updated 03/26/2020.

