



# Privacy Policy

## Xira Intelligence S.A de C.V.

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**PRIVACY NOTICE ISSUED BY XIRA INTELLIGENCE, S.A. de C.V.  
(HEREINAFTER, XIRA)**

**In compliance with the Federal Law on Protection of Personal Data Held by Private Parties published in the Official Gazette of the Federation (DOF) on July 5, 2010 (THE LAW), as well as its Regulation, which was published in the DOF on December 21, 2011 (THE REGULATION), in the following terms:**

XIRA, with address at Laguna de Mayran number 258 - Floor 1, Colonia Anáhuac, Delegación Miguel Hidalgo, C.P. 11320, Mexico City, recognizing the importance of privacy, confidentiality, and information security that you entrust to us, hereby informs individuals through this Privacy Notice about the use of such information provided to us, as well as the legal mechanisms to exercise the rights conferred by the Law upon you. XIRA will not disclose, share, or in any way provide your personal information to third parties for unlawful purposes or contrary to what the Law and the Regulation indicate, unless authorized by the data subject. Additionally, it is informed that XIRA has a Personal Data Department designated to process requests and promote the protection of your Personal and Sensitive Personal Data. You may address this department by writing to our address or via the email provided in this document to exercise the ARCO rights (as defined later) and the right of revocation detailed below.



## **REQUEST FOR INFORMATION**

XIRA only collects data that is necessary to initiate the planning of future contractual relationships or to begin and fulfill contractual and/or commercial relationships acquired with you, always in accordance with the law. Therefore, the collection of personal data is always done legally and with the consent of the data subject.

XIRA is committed, from the process of collecting your information and throughout its handling, to observe and comply with the principles of Legality, Consent, Information, Quality, Purpose, Loyalty, Proportionality, and Responsibility regarding the Personal Data or Sensitive Personal Data collected.

XIRA has administrative, technical, technological, and physical security measures in place that ensure the confidentiality and security of the information you provide to us.

The following are the personal data that XIRA collects in accordance with the law, depending on the type of relationship you have with us, understanding that only the minimum necessary data will be collected. These include, but are not limited to:

Personal data collected by XIRA in accordance with the law may include, but are not limited to:

- Name
- Address
- Phone number
- Email address
- Official identification (e.g., government-issued ID)
- Social Security Number (NSS)
- Tax ID (RFC)
- Unique Population Registry Code (CURP)
- Bank account number
- Credit information
- References
- Academic background
- Work history
- Disabilities or physical illnesses (Sensitive Data)
- Psychometric assessments (Sensitive Data)
- Employment data (e.g., employer name, work address, work phone number, work email)
- Any other data necessary to fulfill obligations as required.

Please note that XIRA collects only the minimum necessary personal data depending on the nature of the relationship with us and in compliance with applicable laws and regulations.



In the case of Sensitive Data, XIRA will obtain your express consent, indicating which data will be required and the purpose for which they will be collected.

## **USE OF INFORMATION**

The information you provide to XIRA will be used for the following purposes:

- For Clients and individuals interested in becoming new clients: The information is used for document review processes, financial analysis, credit history investigation, contact, and inquiries. If approved as a client, processes include credit evaluation, completion of the Enrollment Application form, system enrollment, dossier preparation, contracts, purchase orders, invoicing; collection processes, contact, service offerings, promotions, and those strictly necessary to fulfill the relationship with us.

- For Suppliers and individuals interested in becoming new suppliers: The information is used to validate addresses, account numbers, names, and overall verify that the provided information is accurate and correct, as well as for contact and inquiries. Additionally, if their services are required, the information is used to register the supplier in our system, prepare files, contracts, purchase orders, invoicing; payment processes, contact, request for quotations, service offerings, promotions, and those strictly necessary to fulfill the relationship with us.

- Regarding individuals interested in our Job Opportunities: The collected information is used for contact purposes, interviews, recruitment processes, evaluation, and selection of candidates, and, if applicable, hiring.

- Regarding Employees: The collected information is used for contact purposes, contract signing, registration of information in our database, creation of personnel records, registration with various governmental agencies as required by Mexican legislation, payment processes, updates, training courses, and any activities strictly necessary to fulfill the employment relationship with us.

In the event that XIRA intends to process your information for purposes other than those established in this Privacy Notice, we will need to obtain your consent again by informing you of the intended use.

Regarding Sensitive Personal Data, we will obtain your express consent explicitly before processing such data.

## **ARCO RIGHTS**

The rights that, in accordance with the law, you can exercise before XIRA are as follows:

### **RIGHT DESCRIPTION**

Access is the right of the individual to request from XIRA information about the existence or non-existence of their Personal Data in XIRA's database. It also includes the right to know the Privacy Notice that governs the treatment of their information.

Rectification is the right by which individuals can request XIRA to correct their Personal Data that is in its possession when it is incorrect or incomplete.

Cancellation is the right of individuals to request the cancellation of their Personal Data held by XIRA. This leads to a blocking period after which the information will be deleted.

Objection is the right of individuals to request XIRA to refrain from processing their Personal Data in certain situations.

### **REQUESTS**

-All requests submitted by individuals, or their Legal Representative, for the exercise of their ARCO Rights to be delivered to XIRA, whether at our offices or via email, must meet the following requirements:

- Name of the data subject.
- Address.
- Telephone number.
- Email address and alternative email address to communicate the response to the request, if authorized.
- Attach documents that prove the identity and, if applicable, the legal representation of the data subject.

-Clear and precise description of the personal data for which one of the aforementioned rights is being exercised.

- Any other element or document that facilitates the location of the personal data.

- If applicable, the person authorized to receive the response. In this case, we will request that the authorized person provide identification upon receipt of the information.



The individual acknowledges that for security reasons related to their personal information, XIRA may request additional documentation to verify ownership of the information and the authenticity of the documents presented to XIRA, always acting within the terms permitted by the law

## **PROCESSING OF REQUESTS.**

XIRA will receive requests from individuals exercising their ARCO Rights, ensuring that the requests contain the necessary data and documentation to prove the requester's identity as the Data Subject or, if applicable, the legal representative of the Data Subject, as well as meeting the specified requirements. In the case of rectification requests, the Data Subject must also indicate the modifications to be made and provide supporting documentation for their request.

If the request from the individual does not meet the requirements specified by law, XIRA will promptly respond within a period not exceeding five business days from the date of receiving the request. XIRA will indicate the impossibility of issuing a response due to the lack of necessary requirements and will provide guidance on how to fulfill these requirements.

If the requests meet the corresponding requirements, XIRA must respond to the request(s) from the individual(s) within a maximum period of 20 business days, counted from the date the request for access, rectification, cancellation, or opposition was received. The resolutions issued must be effective within 15 business days following the date XIRA communicated the response. The aforementioned deadlines may be extended once for an equal period, provided that the circumstances justify such an extension.

The delivery of the data to the data subject or their legal representative will be free of charge. The data subject or their representative may only be required to cover the costs of shipping, copies, or reproduction in another format, if applicable.

The individual may revoke the consent they have granted for the processing of their personal data at any time, unless there are pending obligations that prevent compliance with the individual's request for revocation.



## **TRANSFER OF INDIVIDUAL'S DATA.**

By this means and unless instructed otherwise, you as the data subject of the provided personal information consent to the processing of your information and its transfer by XIRA, both within and outside of the United Mexican States, to any parent company, subsidiary, affiliate, or group company under the control or in which XIRA participates, as well as those companies with which XIRA has contractual and/or commercial relationships, provided that they have policies for handling Personal Data and Sensitive Personal Data, always respecting the purposes for which the information was collected.

## **CONTACT**

If you have any doubts, comments, suggestions, or wish to exercise any of your ARCO rights, you can contact us using the following contact information:

- Contact: Dafne Herrera Segura
- Address: Mariano Escobedo 220, Col. Anahuac, Del. Miguel Hidalgo, Mexico City, C.P. 11320
- Phone: 50153200
- Email: [derechosarco@PENTAFON.com](mailto:derechosarco@PENTAFON.com)

You can reach out to us using any of the methods specified in this notice.

## **CONSENT**

By means of this document, you have been informed about the processing of personal information provided to XIRA, the rights granted to you by law, and how to exercise them. Therefore, by providing your Personal Data to XIRA, you express your agreement with this information and grant your consent for XIRA to collect and use your Personal Data in accordance with the purposes and terms outlined in this notice, unless instructed otherwise by you directed to XIRA.

You also acknowledge that the Personal Data provided to XIRA is truthful, current, authentic, and complete, thereby releasing XIRA from any liability in this regard. This acknowledgment is made because you are solely responsible for the truthfulness, currency, authenticity, and accuracy of your Personal Data.



## **REVOCACTION OF CONSENT**

Consent can only be revoked if there are no pending obligations between the parties. To do this, you must send a request to revoke consent to XIRA, addressed to the contact details provided, meeting the requirements outlined in this Privacy Notice.

This Privacy Notice is located on the website <http://XIRA.ai>. Any modifications to this Privacy Notice will be notified through that website.

