

# Privacy and Personal Data Protection Policy

## América Móvil



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# Privacy and Personal Data Protection Policy

## América Móvil



### 1. Introduction

To América Móvil, S.A.B. de C.V., its subsidiaries and affiliates (“América Móvil” or the “Company”), the privacy of communications and the Protection of Personal Data are critical to preserving the reputation for trustworthiness the Company has been known for since its inception.

The evolution of technology in general, and of telecommunications in particular, as well as the demands of Data Subjects for increased Privacy, have led to the enactment of more stringent regulations concerning the lawful Processing of Personal Data in order to protect the Privacy of individuals and guarantee their right to freely make well-informed decisions about the use of their personal data. These regulations are mandatory for all who come into possession of Personal Data, as is the case of our Company.

Given the challenges undertaken by América Móvil in connection with our pledge to implement an Integrity and Compliance Program, we identified the formal adoption of a Privacy Program through this Policy as one of its strategic points. A robust Privacy Program will most certainly give our Company a competitive edge and commercial positioning.

Accordingly, through this Privacy and Personal Data Protection Policy (the “Policy”), we at América Móvil confirm our commitment to raising our Personal Data protection standards, providing guidance to incorporate measures that guarantee the secure, confidential, lawful and responsible Processing of Personal Data, and fairly and transparently disclosing the conditions for the use of information, in accordance with applicable legal requirements in each region and international best practices and recommendations.

This Policy is a reflection of the constant, demonstrable and proactive compliance efforts of our Company to meet the various obligations specified in applicable laws and rules for the Protection of Personal Data, which we undertake in order to safeguard the personal information entrusted to us. This approach is fundamental to ensure human rights are respected and protected in each jurisdiction where we operate.

Failure to follow this Policy, our Code of Ethics, our internal policies and procedures related to Privacy and the Protection of Personal Data, as well as obligations set forth in applicable laws, rules and regulations, may lead to administrative and criminal sanctions, including termination of contractual arrangements or provision of Services, fines and even individual imprisonment.

At América Móvil, the commitment Personal Data protection is everyone’s.

### 2. Purpose

América Móvil's Privacy Program has been designed to provide the required structure and guidance to incorporate appropriate Privacy practices and high standards into our daily operations with the purpose of building trust and offering transparency and certainty to those who have entrusted us with their information.

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The purpose of this Policy is to set forth the principles and guidelines that shall govern the proper use of Personal Data in our Company, as well as recommendations regarding physical, technical and administrative measures to be observed in security matters, diligently confirm our commitment to comply with our various legal obligations in accordance with applicable laws and preserve our Company's integrity and business reputation as an entity fully committed to Privacy and Personal Data Protection before third parties.

In addition, this Policy contains guidelines applicable to the Privacy of communications in connection with the provision of our Services in the different jurisdictions where we operate.

### 3. Scope

This Policy is applicable to and mandatory for you and each and every one of our Employees, both internal and external, Processors and Third-Party service providers, who have access to Personal Data held by América Móvil in each of the countries where we operate. Accordingly, it is essential for you to know, understand, promote and respect the principles, values and directives contained herein.

### 4. Definitions

**Compliance Office:** It is the area of América Móvil responsible for establishing an Integrity and Compliance Program that includes proper and efficient policies and systems of control, surveillance and audit, and which examines constantly and periodically the compliance of the integrity standards at all the organization. [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

**Compliance Office at Subsidiary:** it is the area of the Subsidiary being responsible for executing, surveilling compliance and releasing the Integrity and Compliance Program, according to the criteria, indications and evaluations of the Compliance Office of América Móvil.

**Confidentiality:** means the obligation of any person that handles Personal Data to refrain from disclosing any such data.

**Controller:** means the legal person that makes decisions with respect to the use of Personal Data. Each Subsidiary of América Móvil is the controller of all Personal Data provided to it by Data Subjects.

**Data Subject:** means the natural person to whom Personal Data relates.

**Employee(s):** means any individual or individuals who are employed under an individual or collective bargaining agreement by América Móvil or any of its Subsidiaries, and/or who renders professional or other similar Services thereto to América Móvil or any of its Subsidiaries.

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**Integrity and Compliance Program:** Program developed and supervised by the Compliance Office, including but not limited to: (i) the preparation of policies and other guidelines of the Company in order to comply with the currently valid law; (ii) the identification, prevention and mitigation of the operational and legal Risks in order to guarantee a long-term reputational value of the Company and generate more certainty for its value chain; (iii) establishing proper and efficient systems of control, surveillance and audit, which constantly and periodically examine the compliance of the integrity standards in all the organization; and (iv) the operation management of the Whistleblowing and coordination of training on matters of compliance.

**Personal Data:** any information concerning an identified or identifiable individual.

**Personal Data Protection:** a natural person's or Data Subject's right to protection against the illicit use of its Personal Data, granting them the power to decide and control the use of their information.

**Privacy:** the adequate use or Processing of Personal Data for the purposes authorized by the Data Subject and in accordance with the applicable laws.

**Privacy Notice:** means a physical or electronic document generated by the Controller, that is made available to a Data Subject prior to the Processing of his Personal Data.

**Privacy Program:** set of policies, guidelines, awareness-building instruments, and training mechanisms implemented by América Móvil to demonstrate compliance with its Privacy and Personal Data protection obligations.

**Privacy Team:** América Móvil's Personal Data Protection Group, which is responsible for overseeing and making decisions with respect to the Company's Privacy strategy.

**Processing:** the collection, use, disclosure or storage of Personal Data by any means. Use includes any action of access, management, exploitation, transfer or disposal of Personal Data.

**Processor(s):** a natural or legal person that, alone or jointly with others, processes Personal Data on behalf of América Móvil or its Subsidiaries.

**Risk:** the probability of having a negative event, and the effect or impact of such event, whose existence poses a threat (Risk source) and vulnerability of the Company to its effects.

**Security:** implementation of adequate physical, technical and administrative measures with regard to Personal Data protection.

**Sensitive Personal Data or Special Personal Data:** Personal Data which, if unlawfully used, would likely lead to material damage to the Data Subject. Examples of sensitive or special Personal Data include data concerning health, political or religious affiliation, sexual orientation, union memberships and, in some instances, biometric data of an individual.

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**Services:** those services rendered under a service provision contract between a Subsidiary or affiliate of América Móvil and a Data Subject; any service which involves the use of applications, software, websites and terminal equipment functionalities, and/or any other service that Data Subjects voluntarily decide to acquire.

**Subsidiary:** Any entity that is under América Móvil's control.

**Third Party(ies):** Distributors, representatives, consultants, commercial partners, agents, intermediaries, customers, contractors, lobbyists, advisors or suppliers who are part of the value chain of América Móvil or those who represent the Company during an interaction with another Third Party, a Government or Public Officials. This includes the civil society organizations and the education, charity, cultural or sports institutions.

**Transfer:** Any data communication of Personal Data to a person other than the Controller or Processor.

**Transmission:** means any communication of Personal Data between the Controller and the Processor.

**Whistleblowing:** It is the internal platform of América Móvil through which the Employees or Third Parties may complain anonymously and confidentially about any breach to the Code of Ethics and/or to the Company policies <https://denuncias.americamovil.com/>

## 5. General Guidelines

### 5.1. Privacy Program

In an effort to raise our Personal Data Protection standards, we have adopted a Privacy Program that lays the cornerstones to build the various actions implemented by América Móvil to comply with our legal obligations and demonstrate on an ongoing and transparent basis that we have in place all necessary controls to protect Personal Data at each Processing stage.

The cornerstones of our Privacy Program are:

- **Responsible Management.** For América Móvil, protecting Personal Data is a daily task that is translated into a proactive responsibility to apply appropriate physical, technical and organizational measures to guarantee and demonstrate that Personal Data is processed in line with applicable regulations.
- **Commitment.** We guarantee that Personal Data is protected and used exclusively for the purposes authorized by the Data Subject and in accordance with applicable regulations. In addition, throughout the phases of development, provision and improvement of our Services, we adhere to a permanent ethical commitment to protect people's privacy, human rights, fundamental freedoms and dignity, in accordance with applicable laws in effect in the countries where we operate.



- **Legal.** All of us who are part of América Móvil and at every level of our organization are obliged to comply with procedures and policies to protect Personal Data in our company, as well as with applicable laws in each jurisdiction where we operate.

For América Móvil, Personal Data Protection is crucial activity to promote and guarantee respect for human rights in each of the jurisdictions where we operate. We are firmly committed to the lawful Processing of Personal Data and to the application of the necessary measures to constantly demonstrate responsible handling of such data, which are described in the guidelines set forth herein.

### A. Data Protection by Design and by Default

We endeavor to implement appropriate physical, technical and organizational measures, both at the time of determining the means of Processing and at the time of Processing the Personal Data, taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of the Processing, as well as the risks that certain Processing could imply for the rights and freedoms of Data Subjects.

In line with international trends, we strive to incorporate data protection **by design**, seeking a healthy balance between company's interests and the protection of individual's rights, maintaining a focus on the privacy of Data Subjects, and offering visibility and transparency in the handling of their information.

Further, we apply appropriate technical and organizational measures to ensure that, **by default**, only Personal Data, which is necessary for each specific purpose of the Processing, is processed. In addition, we ensure that the Personal Data collected is used for no longer than is required in relation to the purpose of the Processing.

### 5.2. Privacy Team

América Móvil has a strict duty to comply with local laws and regulations regarding Privacy and Protection of Personal Data, in each of the countries in which it operates. Compliance with legally applicable provisions is ensured through the creation of duly trained local compliance teams who are in charge of the legal analysis, adaptation and issuance of policies, processes and guidelines of the company according to the needs reflected in the laws of each jurisdiction. As part of their functions, the compliance teams constantly monitor and review current regulations and legislative proposals in the countries where we operate, in order to know and identify potential impacts that a given regulation may have on the guarantee of human rights, particularly those related to privacy and the protection of personal data.

By this token, in order to disseminate, execute and monitor compliance with the Privacy Program and this Policy, América Móvil has a Privacy Team comprised of experts with broad experience in legal matters and best practices in Privacy and Personal Data Protection from each Subsidiary and/or region, to better understand the inner workings and Privacy needs of each principal unit.

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Our Privacy Team works to ensure that América Móvil's standard continuously and demonstrably supports compliance with legal obligations and is in line with our business objectives, achieving maximum Personal Data Protection at all levels.

### **A. Integration of América Móvil's Privacy Team**

Our Privacy Team is comprised by the Local Data Protection Officer (or local Data Protection "Officer" or "Data Protection Delegate", or any other terminology adopted in accordance with applicable regulations) designated, among other things, for such purpose and who is responsible for Personal Data Protection in one or more of América Móvil's Subsidiaries, in a given country or region. Each Subsidiary and/or region is responsible for the appointment of such expert personnel, as it deems necessary for the performance of its duties.

The Privacy Team will be led by América Móvil's Data Protection Officer, who is part of América Móvil's Compliance Office.

### **B. Duties of América Móvil's Privacy Team**

The duties of América Móvil's Privacy Team include, without limitation:

- Define and coordinate the implementation of actions, tools and mechanisms to foster a Personal Data Protection culture in América Móvil, and accredit the observance of the different Personal Data Protection obligations specified in applicable laws, rules and regulations are fulfilled.
- Issue the necessary mandatory policies for the Company.
- Identify threats and coordinate Privacy Risks assessments.
- Design strategies to prevent Security breaches and noncompliance with applicable laws, rules and regulations, as well as to guarantee the rights of Data Subjects.
- Conduct audits and reviews to monitor compliance with our policies and applicable regulations.
- Coordinate Personal Data Protection and Privacy training and communication strategy efforts.

### **C. Duties of the Local Data Protection Officer**

Without prejudice to the duties imposed by applicable laws in their respective jurisdictions, Local Data Protection Officers shall, at least:



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- Participate, in a timely manner and as necessary, in all matters pertaining to Personal Data Protection.
- Advise all business units in Personal Data Protection matters and related projects of their Subsidiary and/or region and coordinate such actions as necessary to ensure that Personal Data Protection policies and/or practices are observed.
- Analyze, monitor and assess the logical flow of personal information to identify Processing types, life cycles and databases, which are subject to laws applicable in these matters.
- Identify personal data Processing activities and projects that may lead to a possible violation of laws in effect or could potentially affect materially the fundamental freedoms and rights of Data Subjects.
- Identify threats, possible harms to the privacy of Data Subjects as a consequence of the entry into force, issuance, application or possible enactment of various legal provisions, both general or sectorial, particularly those related to criminal activity, law enforcement, cooperation with competent authorities, national security and telecommunications, among others.
- Review our internal privacy policies and procedures and the effect they may have on the rights of individuals upon becoming effective. We will not adopt measures that directly affect the rights of individuals.
- Prepare, review and, where appropriate, modify Privacy Notices or local Policies as required by applicable laws.
- Record and duly process in a timely manner all requests submitted by Data Subjects in connection with the exercise of rights over their Personal Data and establish procedures to address their complaints in this matter.
- Oversee compliance with Personal Data Protection principles and duties established by applicable laws, as well as with América Móvil's Privacy and Personal Data Protection Policy and any related policies and procedures.
- Review and update agreements with Third Parties that may receive personal data to govern Transfers, Remissions and, in general, communications of Personal Data to third parties, to ensure they are conducted in compliance with applicable laws in effect.
- Process, manage and collaborate with any requests of competent authorities with regard to Personal Data.



- Collaborate in the activities of identification, analysis and treatment of risks of certain personal data processing in accordance with the criteria provided by the applicable laws and authorities, as well as with the risks arising from the functions described above.

### **D. Risk Assessment**

An important pillar of our Privacy Program is the identification of our legal obligations and existing proceedings in connection with Personal Data Protection, and the determination of the level of compliance in each of the Company's Subsidiaries. Risk analysis is a tool that allows us to make an objective assessment of the risks and determine the possible measures that can be implemented to mitigate them in the event a certain Processing or activity may affect the rights of individuals.

To do this, we take into account various applicable legal requirements, as well as international best practices and standards for the Protection of Personal Data. Further, before launching new products and services, we at América Móvil conduct an assessment of possible risks and implications a specific processing of personal data may involve for the fundamental rights and liberties of people, such as freedom of speech, privacy, and protection of personal data. In particular, the Company implements measures to identify, prevent and eradicate discrimination or disloyal practices in all activities requiring the use of personal data.

In addition, when planning to issue, modify or add internal policies and procedures, the risks derived from implementing our own privacy and local policies should be considered in order to assess and/or mitigate anything that may affect the rights of freedom of speech, information, privacy and non-discrimination of data subjects.

We at América Móvil are committed to being proactive, responsible and ethical in the use of algorithms and technologies based on artificial intelligence, verifying that they are used in line with our internal policies and with human rights regulations in effect, so we will not adopt practices that may directly and without justification restrict or unduly affect people's human rights.

Among the duties of the Privacy Team is to identify the life cycle of personal data in each of the Company's Subsidiaries, identify threats and vulnerabilities, and manage risks in order to design strategies to prevent data breaches and/or violations of applicable laws, and accordingly, ensure that Data Subjects enjoy human rights such as privacy, protection of personal data and freedom of speech.

We constantly work to manage Risks with the purpose of minimizing exposure, improving our control measures to reduce their likelihood and impact, and mitigating inherent Risks through the adoption of appropriate measures until any residual Risks are at a reasonable level.

In general terms, our risk management and handling process is based on various international standards for information security that allow us to identify, assess, avoid, mitigate, accept and manage risks to the company's assets and information.



Our risk analysis and management methodology is based on mechanisms to review and reassess with the purpose of ensuring that our internal regulations and the obligations provided for in applicable laws are fulfilled.

Our risk management methodology takes into account the following:

- Design of a risk management framework.
- Implementation of all necessary mechanisms for risk management.
- Follow-up of risks with audits or reports.
- Changes in the framework in order to improve and avoid both foreseen risks and unforeseen risks.

At América Móvil, risk assessment is not a static activity, but is subject to a constant evaluation process in order to protect the information Data Subjects entrust us.

In line with the principles of proactive responsibility and ongoing improvement, our Risk map will be updated once a year, or more often where necessary in view of material issues that may impact its structure.

### **E. Data Protection Impact Assessment (DPIA)**

When it is likely that a certain Processing, particularly if it involves using new technologies, due to its nature, scope, context or purposes, may involve a high risk for the protection of human rights and fundamental freedoms, in line with the best international practices and applicable legal requirements, each Subsidiary or region will conduct, prior to adopting such Processing, a Data Protection Impact Assessment (DPIA) with the purpose of showing that it acts responsibly in using personal data and applying specific measures to identify, contain and mitigate risks that may be derived from the use of personal data.

### **F. Data inventory**

At all times, and as our Personal Data Processing operations change or evolve, we will keep a record of our own Processing activities and those performed by our authorized Third Parties, in accordance with requirements in applicable legal requirements.

### **5.3. Legal Basis for the Processing of Personal Data**

América Móvil processes Data Subject Personal Data for the purpose of fulfilling its contractual obligations and providing contracted Services. Our activities, in order to be lawful, must be supported by a legitimate basis or due legal authorization.

Our actions to process Personal Data fairly and lawfully will focus primarily on:

- Identify the legal basis that legitimizes the processing of personal data in accordance with applicable legal provisions.



- If legally necessary, obtain consent from Data Subjects to process their Personal Data.
- Use personal data exclusively for the specific purposes authorized by the data subject, avoiding misleading or fraudulent actions and any Processing for purposes not previously informed to the Data Subject.
- Process only the minimum, relevant and necessary data to fulfill the informed purposes.
- Inform Data Subjects about the scope of processing via a Privacy Notice and/or local Privacy Policy prepared in accordance with the requirements provided by applicable laws.
- Establish procedures to ensure data are correct and updated.
- Retain data only for the legally applicable or required time periods.

### 5.4. Transparency

In accordance with the provisions of the applicable laws, prior to collecting Personal, we must inform Data Subjects, in a loyal, transparent manner and with clear and plain language, at least the following:

#### A. Identity of the Organization Responsible for Processing Personal Data

We will provide to the Data Subjects information on the identity and address of the Company and/or the entities responsible for Processing the Personal Data entrusted to us.

#### B. Personal Data Collected from Data Subjects

América Móvil collects Personal Data in different ways and through various channels, including directly in person from the Data Subjects and indirectly through our Subsidiaries and/or affiliates, Third Parties with whom we have executed binding arrangements, as well as legitimate public sources.

We may process Personal Data belonging to different categories depending on the nature of the contracted Services and/or the relationship we have with the Data Subjects, among which we can mention, but not limited to: Personal Data for identification and authentication, contact, patrimonial and/or financial, fiscal, demographic, data on the devices used for the provision of our Services and their geographic location, information about preferences and interests related to our Services, as well as information generated by the use of the Services we provide.

Regarding the information we collect from Employees and candidates, we may process Personal Data for identification and authentication, contact data, financial data, tax data, demographic data, academic, employment and personal data generated over the course of our contractual relationship with them.

Also, in certain cases we may collect biometric data related to the physical and physiological characteristics (e.g., fingerprints, facial features, iris and hand geometry), and/or information

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on behavior and personality (e.g., signature, handwriting, voice and keyboard handwriting recognition), or data related to the current and/or future health status of our Employees and/or Third Parties in order to comply certain employment, health and/or public health obligations.

In addition, whenever necessary to provide the Services, we may collect and Process inferred data obtained using data processing technologies for the purpose of profiling and understanding of users of our services.

### **a. Third-Party Personal Data**

In certain cases, we may Process third-party identification and contact data to be contacted as personal references associated with the service owner for purposes related to the fulfillment of our obligations arising from to the contracted Services and/or to offer our Services. We may also process third party Personal Data whenever our Employees provide them for contact purposes, in case of emergency, or to manage certain employment benefits.

### **b. Minors**

América Móvil prohibits the collection of Personal Data directly from minors and will immediately erase any such data upon becoming aware that such information is related to this type of Data Subjects. We will only collect Personal Data of children and/or teenagers with the consent of their parents, guardian and/or any other person with parental responsibility under applicable regulations.

### **c. Information about Devices**

When using our Services, in particular through the use of applications, software or programs owned by América Móvil, we may directly collect and/or infer information from the use of certain Services, about the devices used for the provision of Services, including information related to technical characteristics, configuration and operating system of such devices, information generated by other devices connected or used (including IP address, device identification data, preferences and information generated as a result of interactions with other devices and applications), network traffic data, data on the use and consumption of Internet Services, information related to the use of software and applications, and information about the use of Third-Party Services.

### **d. Use of Cookies, Tracking and Other Technologies**

Our websites and applications may use cookies, web beacons and other tracking technologies through which it may be possible to monitor the behaviors of Service users, offer them new products and Services based on their interests and preferences, provide better services and/or improve their browsing experience in our website(s). To comply with the above, we may use both first- and third-party cookies, in accordance with the provisions set forth in the cookie policy of the relevant website. The cookies policy contains information



about the cookies we use, their purposes, and the procedure to disable them if they are not necessary for the operation of our website(s).

### **e. Use of Algorithms, Artificial Intelligence and Big Data**

In certain cases, we may use artificial intelligence-based algorithms to conduct specific mass data analysis activities by combining data from various lawful sources for the purpose of profiling, understanding, among other things, consumers' interests, trends and preferences, and improving our products and Services. Whenever convenient and feasible, we will use anonymized information that does not allow the identification of an individual in particular.

When using these technologies, América Móvil is strongly committed to refrain from processing data in ways that may involve serious risks of discrimination, segregation or direct harm to people's dignity or human rights and fundamental freedoms such as privacy, protection of personal data and freedom of speech. Before any such processing is conducted, we will assess the risks involved in the specific processing by means of and DPIA if it is legally necessary.

As instructed by the applicable regulations, and provided our intellectual property and free competition rights are not infringed, we may disclose, upon a duly justified and legally valid request, the main aspects considered to adopt specific technologies based on the use of artificial intelligence algorithms. In addition, we will hold harmless Data Subjects' rights of access, rectification, elimination and opposition to the use of their information in accordance with the provision of the applicable laws.

### **f. Anonymized Information and other improved privacy technologies**

Whenever possible and whenever we do not need to identify Data Subjects, personal data anonymization techniques will be applied to prevent identification of Data Subjects. In practice, we use several legally admissible anonymization techniques that are in accordance with applicable laws and international best practices. Using anonymization allows us to reduce the risk of inappropriate processing of personal data.

By using certain anonymization techniques, data cannot be associated with a particular person, therefore, such information is excluded from the scope of the applicable regulation for the protection of personal data and will be considered relevant commercial and confidential information. Once such information is not necessary for the development of our Services, we will proceed to delete it permanently.

In addition to anonymization procedures applied to personal data, we have available other techniques that can be used to minimize the amount of processed data, such as homomorphic encryption, and data masking procedures such as data pseudonymization, obfuscation and minimization.



### **g. Uses of Personal Data**

The Personal Data we collect and infer may be used for various purposes depending on the type of information collected, the Service and the context for which it was collected. América Móvil will limit the collection, use, disclosure and conservation of the personal data collected solely and exclusively to fulfill the primary and secondary purposes that have been previously informed to Data Subjects, in accordance with applicable regulations and our Local Privacy Policies. Among the most frequent purposes are the following:

- Contracting of the service and the fulfillment of the obligations derived from the provision of said service.
- Customization and improvement of our Services according to the customer needs.
- Identification and promotion of Services which may be of interest to our customers.
- Sending advertising and commercial prospecting.
- Processing Personal Data without human judgment and profiling activities.
- Selection and administration of labor personnel.
- Compliance with obligations set forth in applicable laws, rules, regulations, court orders, official and public safety requirements in effect in each of the countries where we operate.

América Móvil does not commercialize, distribute or lease personal data of Data Subjects, except in the case that the Data Subjects specifically and knowledgeably instructs us to deliver the information to a third party authorized by him/her. Personal data and information of Data Subjects are protected by technical and organizational security measures in accordance with regulations.

### **D. Transfers of Personal Data**

All Transfer and/or Transmission of Personal Data shall fulfill the requirements specified in applicable regulations in order to guarantee the safe flow of personal data, and will be duly governed by a suitable legally binding instrument that sets forth the parties' obligations and responsibilities regarding the Protection of Personal Data in accordance with applicable laws in each country where we operate.

In order to comply with the obligations arising from the provision of the Services, we may share data and information of the Data Subjects in the following cases:

- With competent authorities in the cases legally foreseen when required by law or upon a duly substantiated written order from a competent judicial authority.



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- With Subsidiaries or affiliates that comply with the same Privacy standards applicable to América Móvil.
- With our business partners.
- With Third Parties that may become involved in the provision of the contracted or requested Services and allow us to guarantee the fulfillment of obligations acquired in connection with the Services.

As to our Employees, we may share their information in the following cases:

- To competent authorities where required by law.
- To banking institutions in order to make relevant payments, to insurance companies in connection with insurance and reimbursement procedures, to pension fund managers and to third parties working with us in the management of benefits and incentives that may be applicable; and
- To recruiters and other third party entities in order to provide references for workers, in which case their consent will be necessary.

Notwithstanding the foregoing, in certain specific situations we may be required to share Personal Data and information to other Third parties, so, prior to sharing Personal Data, we will specifically inform who are the recipients or types of recipients and the purposes for which the information will be shared.

We will only share such information to territories and/or third parties where adequate compliance with applicable Personal Data Protection regulations is guaranteed and adequate measures are in place to protect the fundamental rights and freedoms of individuals.

### **E. Retention of Personal Information**

In América Movil we will only retain Personal Data that is necessary and relevant for the fulfillment of the purposes previously informed to Data Subjects in the relevant Policy and/or Privacy Notice with the purpose of providing the requested Services, as well as to comply with the contractual and legal obligations, as required.

However, under certain circumstances and if justified under the law, we may retain Personal Data necessary to fulfill the purposes identified in each operation.

We will securely and permanently delete Personal Data after the applicable retention periods have expired. Although we are not required to do so in every jurisdiction where we operate, wherever it is a legal requirement, we will endeavor to inform Data Subjects about the applicable Personal Data retention periods for each Processing activity.





### 5.5. Rights of the Data Subject

In accordance with the provisions of applicable law in each country where we operate, Data Subjects may have various rights to control the use of their personal information.

Although there are variations between jurisdictions, meeting the formal requirements specified in applicable laws, Data Subjects may exercise the following rights with respect to some or all of their personal data in our possession, including information obtained directly, generated in connection with services, inferred or provided by third parties:

- **Access.** Access to the personal data provided by Data Subjects, and to those obtained in connection with the Services, and to request a copy of such data in legible and easy to understand formats.
- **Portability.** Get their personal data in a way that is structured, in a commonly used and machine-readable format, and send the data to another controller without hindrances from the controller who had them.
- **Rectification.** Modify their Personal Data when they are incorrect or updated.
- **Deletion or Suppression.** Request their personal data to be deleted once the purpose for which it was processed has ended or if they are not processed in accordance with applicable regulations. Data deletion will be subject to the blocking and retention periods provided by applicable laws.
- **Opposition.** Request that their data are not processed for purposes other than those necessary to provide services, such as advertising and commercial prospecting campaigns.

The exercise of these rights and any other rights provided by law is subject to compliance with the applicable legal provisions. In general, in order to process the above-mentioned requests, Data Subjects may be required to comply with requirements such as clearly and concisely state the scope of their request, attach all necessary official documentation to prove their identity, attach documentation to prove their mandate, if acting on behalf of another person, and attach any additional documentation, if necessary, to correctly process their request.

América Móvil is committed to responding without undue delay to the requests of Data Subjects regarding the exercise of their rights, and to claims or complaints of Data Subjects, provided they are within our purview. Each of our Subsidiaries will establish in clear terms the means, procedures, deadlines and formats to do this, in accordance with the laws of their home country. This information will be provided to the Data Subjects free of charge and, to the extent technically practicable, in a readable and easily intelligible format.



### **5.6. Targeted Advertising**

Targeted advertising, or ad targeting, is a way in which we present our consumers with ads that reflect their interests and purchase behavior in particular.

Before any such practices are put into place, through data analysis processes based on artificial intelligence or similar technologies, we duly inform Data Subjects about the conditions to which the processing will be subject via a Privacy Notice and/or Policy, and we previously complete a risk assessment to avoid data processing practices that may pose serious risks of discrimination, segregation or direct harm to the rights and fundamental freedoms of individuals.

In conducting this kind of activities, we are committed to processing the minimum necessary and relevant data, and avoid processing sensitive personal data or data that is excessive to comply with such purpose. Further, we will refrain from any practice that implies a violation of applicable regulations or the rights of third parties.

### **5.7. Security and Confidentiality of Personal Data Processing**

América Móvil has adopted high Security standards aimed at guaranteeing the integrity, availability and Confidentiality of information entrusted to us in accordance with the applicable regulatory requirements, security standards and international best practices.

To protect the information entrusted to us, we have implemented physical, technical and administrative measures to ensure an appropriate level of Security that allows us to protect Personal Data, at any stage of Processing, against any event that could involve its loss, or unauthorized access, use, disclosure or Processing of such data.

Access to the personal information of our customers and Employees is restricted to those Employees who need to know the information to perform their duties.

We constantly monitor the adequate operation of our systems, applications and technological infrastructure to ensure adequate Privacy and Personal Data Protection.

The companies in our group are subject to security reviews to ensure our safety measures are sufficient and in accordance with current regulations.

#### **A. Security Incidents**

In accordance with the applicable regulations in each country, there may be security events that may compromise the Company's information security or the rights of Data Subjects.

Actions to record, handle, analyze and mitigate a security incident will be managed pursuant to América Móvil's Information Security Policy and our legal policies and procedures for the handling of security incidents.



Our security protocols allow us to identify, handle, mitigate and timely adopt all necessary corrective measures in the event of a security incident, thus avoiding damaging the business and the rights of the Data Subjects. Accordingly, we pledge to continually improve and update our security controls and measures.

In the event that the current and applicable regulations instruct us to do so, we will comply, in accordance with legally applicable requirements, with the obligation to notify Data Subjects and/or the competent authorities in due time and form in order to avoid any further impact on the rights of Data Subjects.

It is your responsibility and that of all Employees and Third Parties to know and respect the measures that guarantee the Security and Confidentiality of Personal Data in possession of America Móvil. Failure to observe the aforementioned Security measures may result in Risks for the Company and/or the Data Subjects, a situation that may be sanctioned by the Company and/or competent authorities.

### **B. Pseudonymization and Minimization**

When Processing Personal Data, América Móvil is committed to processing and collecting the minimum Personal Data necessary, appropriate and relevant for the purposes for which they are requested, so that will not process Personal Data that is excessive and/or not relevant to fulfill certain purposes of the Processing. In particular, we will limit the Processing and the Processing periods of Sensitive Data or special categories of data.

If not necessary to fulfill the purposes informed to the Data Subjects, we will proceed to the deletion of the personal data according to the applicable retention periods foreseen in the corresponding regulations.

Likewise, where possible, in accordance with our internal policies, we will apply pseudonymization techniques and procedures to mitigate the Risks inherent to certain Personal Data Processing.

### **5.8. Data Protection Training**

As part of our Privacy Program, we have established a comprehensive training program to build awareness of our Personal Data Protection obligations among all our Employees consisting of: (i) an initial online course, (ii) a Privacy toolkit in our internal Privacy page with our policies, directives, comparisons, etc., and (iii) training and refresher courses.

In addition, we have adopted a Communication Strategy to foster ongoing awareness of Personal Data Protection issues. Our Privacy Team will be responsible for identifying any changes necessary to keep our Employees' knowledge up to date.

### **5.9. Continuous Monitoring**

An integral component of our Privacy Program is the ongoing oversight of our Subsidiaries to control, manage and inform of the Risks associated with Privacy management practices.



Our Privacy Team will enforce and oversee our Privacy requirements to ensure that personal information is handled appropriately and consistent with the principles and duties set forth in this Policy.

To supervise compliance with our Privacy Program, America Móvil's Data Protection Office will rely on periodic reporting mechanisms by the Subsidiaries, so that Privacy and Personal Data Protection issues are monitored on an ongoing basis.

Our Privacy Team will conduct Privacy audits to determine to what extent our systems, operations, processes and individuals comply with our Privacy policies and practices.

### **5.10. Privacy of Communications**

The Privacy of our customers' communications is one of our core principles, not only because it is a legal obligation, but also because the public has placed its confidence in us.

América Móvil's guiding principles with respect to the Privacy of communications are as follows:

- No one may listen in any conversation or monitor any transmission of data or other communication, or disclose its existence or contents, except upon a lawful written order of a Competent Authority.
- We may only turn over personal data or geolocate, block, impose service limitations on or keep track or a log of the communications associated with a mobile telephone line where required by law and upon a lawful order of a Competent Authority.

We do not prioritize, block, or delay traffic, applications, protocols, or content for reasons beyond assuring quality of service and network reliability. Our commercial offer for unlimited usage on certain social media apps implies that the user will not be charged for the data used by those applications or web pages. Under no circumstances will the traffic of those apps be prioritized over the rest of the navigation.

### **5.11. Requests of Competent Authorities**

Those of our operating Subsidiaries which are engaged in the provision of telecommunications Services are required, as holders of telecommunications concessions or licenses, to cooperate with the competent authorities in matters pertaining to national Security and law enforcement, including by locating and providing the location of lines in real time, preserving, recording and providing certain types of data concerning the users of their Services and making such data available to such authorities for investigation, law enforcement, crime prevention or legal compliance purposes upon prior written request in the form of a duly substantiated and legally justified official communication issued and executed by the relevant authority, whether in physical form or electronic format, or upon court order, in each case in accordance with the laws of the relevant country.



In addition, in some cases we may be required by law or by order of a competent authority to block, discontinue or remove certain types of online content. In any such case, we will thoroughly review and analyze the relevant request in order to comply with the law and ensure that human rights are respected.

It should be noted that not all the jurisdictions in which we operate offer harmonized protections against the government's access to Personal Data and that in certain events we will be required by law to cooperate with the government in matters pertaining to Security and law enforcement without prior notice to the Data Subjects. In any such case, we will thoroughly review and analyze the relevant request to comply with the law and protect, to the extent legally and materially possible, the Privacy of Data Subjects who use our Services.

We are committed to the protection of human rights and freedom of expression. For this reason, the delivery of information to competent authorities is only allowed where required by law and in any event in accordance with the requirements set forth in the applicable laws of each of the countries in which we operate.

To fulfill these requirements, América Móvil has established a stringent set of Security protocols and criteria for ascertaining the validity of every request from an authority.

### **5.12. Modifications to our Local Privacy Policies**

Notice of all changes to local privacy policies will be given to Data Subjects via publications in the respective Subsidiary's website.

When such modifications imply a material change to the purposes or in the processing of personal data, notice will be given directly to Data Subjects through electronic mechanisms prior to the modifications taking effect. In addition, we will endeavor to maintain available previous versions of such local policies for consultation on the website determined by each Subsidiary.

## **6. Prevention**

To avoid incurring in any violation of Personal Data Protection laws, we, as a Company, and you, as our Employee or as a Third Party, will endeavor to:

- Abide by our Code of Ethics, this Policy, our Information Security Policy, all other relevant policies of the Company and Personal Data Protection laws in effect in each of the countries in which we operate.
- Abide by the principles and provisions set forth in this Policy to ensure the lawful, responsible and transparent Processing of Personal Data relating to the Data Subjects.



- Prior to collecting any Personal Data, Data Subjects must be informed of the conditions applicable to the processing of their data through the relevant Privacy Policy/Privacy Notice. The Privacy policies and/or Privacy Notices of the Subsidiaries responsible for Processing Personal Data in countries that have adopted specific Privacy regulations, are available on their respective websites. Such documents must contain detailed information on the conditions applicable to the Processing of Personal Data, as well as any procedures for Data Subjects to exercise their rights, in accordance with regulatory requirements in effect.
- Obtain the Data Subject's consent to the Processing of Personal Data, where such consent is required as a matter of law.
- Refrain from collecting Personal Data through deceit or fraud, and protect at all times the Data Subjects' interests.
- Access only such information as is strictly necessary to perform your duties.
- Refrain from collecting or processing Personal Data which are not necessary for the processing purposes informed to Data Subjects.
- Collect and store all Personal Data in accordance with the internal procedures of the relevant operation, preserve the integrity of such data, update such data as necessary, and securely and permanently delete such data once the purposes for which it was processed are fulfilled.
- Know, embrace and comply with all physical, technical and organizational measures implemented to protect Personal Data against damage, loss, alteration, destruction or unauthorized use, access or Processing, and procure for the ongoing improvement of such measures.
- Guarantee the exercise of Data Subjects' rights with respect to the protection of their Personal Data. If a request related to Personal Data is received, the Local Privacy Officer must be notified immediately. Other Employees, Processors or Third Parties must refrain from acting on any such request;
- Uphold the duty of Confidentiality with respect to Personal Data in our custody, including the following:
  - Have in place Confidentiality agreements and/or clauses with Employees, suppliers, subcontractors and/or Third parties with access to such information to ensure it is duly protected.
  - Ensure that our Employees understand, acknowledge and accept their obligations with regard to any and all information they have access to, and demand that they use such information solely and exclusively for the authorized purposes.



- Implement corrective mechanisms in the event any Employee violates our duty of Confidentiality.
- Ensure that all Third Parties responsible for Processing Personal Data uphold their Confidentiality and Security duties as required.
- Immediately notify the Company of any event and/or threat that may compromise the Security of its information and/or the Personal Data of Data Subjects.
- Implement adequate measures and mechanisms to demonstrate compliance with the Personal Data Protection obligations by which we are bound in accordance with applicable laws in effect.
- Implement internal controls and, where necessary, report through our Whistleblower Portal and/or to the competent authorities, any violation by Employees or Third Parties of our Code of Ethics, this Policy, our Information Security Policy or other applicable laws, rules and regulations.
- Promote Personal Data Protection practices across the value chain, provide training on relevant prevention measures to our personnel, and implement awareness raising campaigns.
- Establish measures and procedures as necessary to ensure that no one can listen to or monitor any conversation, data transmission or other form of communication, or disclose its existence or content, except for authorized personnel or cases in which we must comply with a duly substantiated order in writing, with legal basis, issued by a competent authority.

In addition, América Móvil's Employees or Third Parties acting directly or on its behalf, shall refrain from:

- Disclosing Data Subjects' Personal Data to unauthorized Third Parties, unless the respective Transfer of Personal Data is required by law and/or has been authorized by the Legal department of the relevant Subsidiary.
- Sharing Personal Data to third parties that do not provide any guarantees regarding their full compliance with Personal Data Protection standards. Prior to sharing T Personal Data to a Third Party service provider, it must be verified that such third party provides adequate conditions and safeguards for the protection of such data.
- Sharing Personal Data to third countries or territories where applicable laws do not provide an appropriate level of protection of such data.
- Using Personal Data held by América Móvil for purposes other than to perform their duties.





- Accessing Personal Data unless access is necessary or we are expressly directed to do so.

### 7. Policy Compliance Oversight and Verification

The Compliance Office, the Compliance Office of the Subsidiary and Internal Audit are those responsible for supervising, surveilling and in its case, audit the due compliance of the provisions indicated in this Policy and its efficacy should be evaluated periodically.

The Compliance Office and the Privacy Team are responsible for evaluating periodically its Privacy Program which includes, among others, a series of measures that are aimed to prevent the infringement of the applicable laws regarding the Personal Data Protection. Likewise, they are responsible for giving orientation to the Employees regarding this Policy, through the email address [privacidad@americamovil.com](mailto:privacidad@americamovil.com) along with the immediate bosses.

In case it is necessary to carry out audits, they shall be done periodically and randomly at the different areas of the Company.

All the Employees of the Company should be committed with supporting and collaborating with the work teams in charge of performing such audits without hindering or obstructing the audit processes and without providing false or incorrect information.

Remember that it is everyone's obligation to comply and make comply the present Policy and report any act that is against it, through the Whistleblowing <https://denuncias.americamovil.com/>

### 8. Training and Release

For us, it is very important to understand and put into practice what is described in this Policy, and in order to encourage a culture of transparency, ethics and of values, América Móvil offers to its Employees and Third Parties, online or in-person courses, which shall be advertised through the official means of communication of the Company so as to train them to make it possible to understand the concepts, scopes, situations, as well as to express concerns that may take place on the day-to-day activities.

It is responsibility of all those who work at América Móvil or at its Subsidiaries, to attend the assigned sessions, comply with the times, and with the requested evaluations.

It is your commitment as Employee of América Móvil, to release the terms and principles of the present Policy and invite the Third Parties with whom business relations are kept, to comply with them.





### 9. Cooperation and Coordination

The Compliance Office is responsible for generating and homologating, as far as possible, the Privacy and Personal Data Protection Policy for the Company. However, the Subsidiaries are the ones responsible for complying with the legal obligations applicable before the Authorities of each country.

Due to the above, the Subsidiaries should have an internal procedure of standard compliance considering the specific obligations of each country on matters of anticorruption and anti-bribery.

Furthermore, the Subsidiaries should ensure that they have efficient mechanisms that allows them to cooperate and, when it corresponds, create between them some coordination at internal level in the development and implementation of policies and activities with regard to Privacy and Personal Data Protection.

### 10. Penalties

Failures to comply with this Policy may lead, both for Employees and Third Parties, to administrative, labor, or even criminal sanctions, depending on the seriousness of the particular act, which will be determined in accordance with internal workplace regulations and/or applicable laws, rules and regulations.

Within América Móvil, the Ethics Committee of each Subsidiary shall be the last instance in determining the penalty in case of default of this Policy, no matter that such default may be penalized in addition by the applicable law, and the competent authorities.

### 11. Whistleblower Portal

To file a complaint in connection with any default to this Policy or our Code of Ethics, we have made available the Whistleblower Portal at <https://denuncias.americamovil.com/>. You, just like every other Employee of América Móvil and Third Parties, are entitled and have an obligation to report directly to your line manager, the Privacy Team, the Compliance Officer, the Subsidiary's Compliance Officer, or through the Whistleblower Portal, any behavior in violation of this Policy, our Code of Ethics or any applicable law, rule, regulation, or internal policy or procedure, and in general, any unethical behavior.

Further, it is our duty to cooperate with any internal or external investigation and keep it confidential. Employees who make a false or misleading complaint may be subject to disciplinary actions.

Remember that failure to report a serious breach of ethics can have disciplinary consequences for you, since you may be concealing an unethical or criminal act. Reports can be made anonymously if the person filing the report wishes to do so; however, we encourage informants to leave some contact details for follow-up during the investigation.

# Privacy and Personal Data Protection Policy

## América Móvil



It is important to note that América Móvil has adopted all the reasonable and justified measures to protect the confidentiality of the complaint and of the complainant; furthermore, we guarantee at every moment that no retaliation will be taken against you for filing the complaint.

Likewise, it is important to make it clear that no provision in this Policy shall be understood to prevent people from directly filing complaints before any authority having jurisdiction. In such cases, our suggestion is that it should be reported to Legal and/or the Compliance Officer, so that they can cooperate with the authorities, if necessary.

All complaints will be investigated by América Móvil's Compliance Officer, who reports to the Audit and Corporate Practices Committee of América Móvil.

The Compliance Officer is in charge of the supervision and operation of the Whistleblower Portal and will send to the Ethics Committees of each Subsidiary the corresponding complaints, for their proper investigation.

### **12. Questions and Comments**

For any question, comment or suggestion in connection with this Policy, please contact us in the following email address: [privacidad@americamovil.com](mailto:privacidad@americamovil.com)