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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 make their own decisions about such data. These regulations are mandatory for all who come into possession of Personal Data, including 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 Personal Data Privacy Program through this Policy as one of its strategic points. A robust Privacy Program will most certainly give our Company a competitive advantage.

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 laws and international best practices.

This Policy is a reflection of the demonstrable, proactive approach we have taken to comply with our Personal Data Protection obligations, and is critical to ensuring that human rights are respected in each of the jurisdictions in which we operate.

Any violation of our Code of Ethics, this Policy, our internal policies and procedures, or breach of obligations set forth in applicable Privacy and Personal Data Protection laws, rules and regulations, may lead to administrative and criminal penalties ranging from contract or service termination to fines or even imprisonment being imposed on individuals.

We at América Móvil share a commitment to the protection of Personal Data.

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2. Purpose

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

The purpose of this Policy is to set forth the principles and guidelines that shall govern the use of Personal Data, as well as the physical, technical and administrative Security measures that we must apply in view of our legal obligations in accordance with applicable laws and our duty to preserve our Company's reputation as an entity fully committed to Personal Data Protection and privacy.

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

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 Parties, 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

Privacy Notice: This means a physical or digital document prepared by the Controller and made available to Data Subjects prior to the Processing of Personal Data.

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

Personal Data: Any information relating to an identified or identifiable natural person.

Sensitive Personal Data: Personal Data which, if unlawfully used, could likely lead to material damage to the Data Subject. Examples of sensitive or special Personal Data include data concerning health and personal data revealing political opinions, religious beliefs, sexual orientation, trade union membership and, in some instances, biometric data.

Employee(s): Any person or persons hired under an individual or collective bargaining agreement by América Móvil or any of its Subsidiaries and providing professional or other services of a similar nature to América Móvil or any of its Subsidiaries.

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Processor: This means the natural or legal person which, alone or jointly with others, determines the processing of Personal Data on behalf of América Móvil or any of its Subsidiaries.

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

Compliance Officer: This is the department of América Móvil responsible for establishing an Integrity and Compliance Program with proper and efficient policies and control, surveillance and audit systems, and in charge of constantly monitoring compliance with integrity standards across the organization. yocumplo@americamovil.com

Subsidiary's Compliance Officer: This means the department in the Subsidiary responsible for implementing, disseminating and overseeing observance of the Integrity and Compliance Program, according to the criteria, indications and assessments of the Compliance Officer of América Móvil.

Whistleblower Portal: The internal platform provided by América Móvil for Employees or Third Parties to report anonymously and confidentially any conduct that infringes upon the Company's Code of Ethics and/or policies <https://denuncias.americamovil.com/>

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

Integrity and Compliance Program: This program was developed and is overseen by the Compliance Officer, and includes, without limitation: (i) preparing Company policies and other guidelines to comply with laws, rules and regulations in effect; (ii) the identification, prevention and mitigation of operational and legal risks in order to ensure the long-term reputational value of the Company and create more certainty around its value chain; (iii) the implementation of appropriate and efficient control, monitoring and audit systems allowing the ongoing and periodic verification of compliance with integrity standards throughout the organization; and (iv) managing operations of the Whistleblower Portal and coordinate training in compliance.

Privacy Program: Set of policies, guidelines, awareness-building instruments, training and mechanisms implemented by América Móvil to demonstrate compliance with América Móvil's Personal Data Protection and Privacy obligations.

Personal Data Protection: A natural person's or Data Subject's right to protection against the illegal processing of Personal Data, granting them the power to decide and control how their information is used.

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

Controller: This means the company 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.

Risk: This means the likelihood of a negative event happening and of its negative effects or impact, the existence of which represent a threat (source of danger) to the Company and makes it vulnerable to their effects.

Security: Implementation of appropriate physical, technical and administrative measures to protect Personal Data.

Services: This means services rendered under a service agreement 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 services that Data Subjects voluntarily decide to acquire.

Subsidiary: Any entity controlled by América Móvil.

Third Party(Parties): Distributors, representatives, advisors, commercial partners, agents, brokers, customers, contractors, managers, lobbyists, consultants or suppliers who are part of the value chain of América Móvil or represent the Company in interactions with another Third Party, a Government or Civil Servants. This includes civil society organizations and education, charitable, cultural or sports institutions.

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

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

Processing: Obtaining, using, disclosing or storing Personal Data by any means. "Use" includes any action to access, manage, exploit, transfer or dispose of Personal Data.

5. General Guidelines

5.1. Privacy Program.

In an effort to raise our Personal Data Protection standards, we have implemented a Privacy Program that lays the cornerstones for a set of actions designed to comply with our legal obligations and demonstrate on an ongoing and transparent basis that we have 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 laws, rules and regulations.
- **Commitment.** We make sure that Personal Data is protected and used only as authorized by the Data Subject and in accordance with applicable laws, rules and regulations.
- **Legal.** We at América Móvil and at every level of our organization agree to comply with procedures and policies for the protection of Personal Data in our company, as well as with applicable laws, rules and regulations.

At América Móvil, Personal Data Protection is crucial, so we ensure that human rights are respected in each of the jurisdictions where we operate. We are fully committed to the lawful Processing of Personal Data and to implementing the required measures to demonstrate it is managed responsibly in accordance with 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 determination of the means for Processing Personal Data and at the time of Processing itself, taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of Processing, as well as the risks that certain Processing could imply for the rights and freedoms of Data Subjects.

Further, we will 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.

5.2. Privacy Team

In order to disseminate, fulfill and oversee the implementation of our Privacy Program and this Policy, we have created a Privacy Team comprised of experts with broad experience in legal matters and best practices in Personal Data Protection from each Subsidiary and/or region, to better understand the inner workings and Privacy needs of each principal unit. Our Privacy Team is there to ensure that América Móvil's standards are adequate to comply with its legal obligations and aligned with our commercial objectives, achieving maximum Personal Data Protection at all levels.



A. Composition of América Móvil's Privacy Team

Our Privacy Team is formed by the Local Data Protection Officer (or local privacy "Controller" or "Delegate", or any other title used in any applicable rules and regulations) designated for this purpose, who will be the Personal Data Protection Controller for one or more of América Móvil's Subsidiaries, in a given country or region. Each Subsidiary and/or region will appoint such expert personnel as it deems necessary for the performance of its duties.

The Privacy Team will be headed by América Móvil's Data Protection Officer, who reports to the Compliance Officer in our Company.

B. Duties of América Móvil's Privacy Team

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

- Define and coordinate the implementation of actions, tools and mechanisms to foster a Personal Data Protection culture in América Móvil, and demonstrate that the various Personal Data Protection obligations specified in applicable laws, rules and regulations are fulfilled.
- Issue all necessary mandatory policies for the Company.
- Identify threats and coordinate Privacy Risk assessments.
- Design strategies to prevent security breaches and noncompliance with applicable laws, rules and regulations, as well as to protect the rights of Data Subjects.
- Conduct audits and reviews to monitor compliance with our policies and applicable laws, rules and 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:



- Become involved, 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 data bases which are subject to laws applicable in these matters.
- Prepare, review and, where appropriate, update Privacy Notices as required by applicable laws.
- 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.
- 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 contracts with Third Parties regarding Transfers and Transmissions of Personal Data.
- Process and manage the requests of competent authorities with regard to Personal Data.

D. Risk Assessment

One of the main pillars of América Móvil's Privacy Program is the identification of the Company's legal obligations and existing proceedings in connection with Personal Data Protection and the determination of the level of compliance of each of the Company's Subsidiaries. Risk assessment is a tool that allows us to make an objective assessment of the relevant Risks and the potential measures available to mitigate them.

To do this, we take into account various applicable legal requirements, as well as applicable and relevant international best practices and standards for the Security of Personal Data.

Our Privacy Team is responsible for mapping out data Processing operations at each of our Subsidiaries, identifying threats and assessing the relevant Risks in order to design strategies to prevent data breaches and/or avoid the violation of applicable laws, as well as to ensure that the rights of the Data Subjects are protected.



We will manage our Risks to minimize our exposure, improving our control measures to reduce their likelihood and impact, as well as to mitigate our inherent Risks based on measures adopted until any residual Risks are at a reasonable level.

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

If a type of Processing is likely to pose a high Risk to the rights and freedoms of Data Subjects owing to its nature, scope, context or purpose, particularly if it involves new technologies, each Subsidiary or region shall, prior to Processing, carry out a Personal Data Protection impact assessment in accordance with applicable directives and consistent with international best practices and applicable laws in the jurisdictions where we operate.

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 laws, rules and regulations.

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. For our Processing activities to be lawful, they must be justified by a legitimate reason or based on a legal authorization.

Our actions to ensure the fair and lawful Processing of Personal Data will focus primarily on:

- Securing Data Subject consent where required for the Processing of Personal Data, unless no such consent is necessary in accordance with applicable laws.
- Processing Personal Data exclusively for the specific purposes authorized by the Data Subject, refraining from using them in any other way, except when expressly authorized.



5.4. Transparency

In accordance with applicable laws, before any Personal Data is collected, information must be provided to Data Subjects in a concise, transparent, intelligible and easily accessible form, using 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 various categories of Personal Data depending on the nature of the Services we will provide to and/or our relationship with each Data Subject, including, without limitation, Personal Data related to identification or authentication, contact details, tax, demographic, asset and/or financial information, data regarding the devices used for the provision of our Services and their geographic location, information on the Data Subject's interests and preferences with respect to our Services, and information derived from the use of our Services.

With regard to current and prospective Employees, we may process Personal Data for identification and authentication purposes, contact details, tax, demographic, asset and/or financial data, and academic, employment and personal data generated over the course of our contractual relationship with them.

In certain cases, we may collect biometric data related to the physical and physiological characteristics of Data Subjects (e.g., fingerprints, facial features, iris and hand geometry), and/or information on their behavior and personality (e.g., signature, handwriting, voice and keystroke recognition), or information about the health of our Employees and/or Third Parties, now and/or in the future, to fulfill certain employment, health and/or public health obligations.

a. Third-Party Personal Data

In certain cases, we may process Third-Party identification and contact data so that they can be contacted as personal references associated with the service owner for purposes related to the fulfillment of our obligations with respect to hired Services and/or to offer our Services. We may also process Third-Party Personal Data whenever our Employees provide them for contact purposes, in an emergency, or to manage certain employment benefits.



b. Children and Teenagers

América Móvil prohibits the collection of Personal Data directly from children and teenagers, 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 laws, rules and regulations.

c. Information about Devices

When someone uses our Services, in particular América Móvil's proprietary software, programs and applications, we may directly collect information and/or infer information from the use of certain Services, about the devices used for the provision of Services, including information on the technical, configuration and operation characteristics of such devices, information of other devices connected or used (e.g., IP addresses, device identification data, preferences and information generated as a result of interactions with other devices and applications), web browsing history, data regarding the use and consumption of online Services and Third-Party Services, information about the use of applications and Services.

d. Use of Cookies, Tracking and Other Technologies

Our websites and applications may use cookies, web beacons and other tracking technologies 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). We may use both first- and third-party cookies, as described in the cookie policy of the relevant website. The cookies policy for each of our websites contains information about the cookies we use, their purposes, and the procedure to disable them if they are not necessary for the operation of the relevant website.

e. Use of Algorithms, Artificial Intelligence and Big Data

In certain cases, we may use artificial intelligence-based algorithms to analyze consumer preferences and trends with regard to the use of products and Services, forecast consumer behaviors and trends with respect to our Services, prepare profiles and analyze data for technical purposes and to improve our products and Services. To the extent that we use any of these technologies, we will endeavor to ensure that such technologies are fair and based on ethical values that respect the dignity and freedom of all people, and that their adoption does not give rise to any form of discrimination or has a direct impact on the rights of individuals.



Where required by applicable laws, we will disclose the issues that were taken into consideration in connection with the adoption of certain technologies supported by artificial intelligence-based algorithms.

f. Anonymized Information

To the extent practicable, where there is no need to identify the Data Subjects, we will use information protection techniques such as Personal Data anonymization to mitigate the risk of unlawful Personal Data Processing. Whenever we apply specific anonymization techniques, rendering individual identification impossible, data protection laws will not be applicable.

C. Permitted Uses of Personal Data

We may collect Personal Data for various purposes depending on the type of data, the Service provided and the context within which data is collected. America Móvil will inform about the primary and secondary purposes for which Personal Data is collected, which may include the following:

- The execution of a service agreement and the performance of all obligations related to the provision of the service.
- The personalization and improvement of the Services provided to the customer.
- The identification and promotion of Services which may be of interest to our customers.
- Sending marketing and commercial prospecting materials.
- Processing Personal Data without any human intervention to evaluate and carry out profiling activities.
- Compliance with obligations set forth in applicable laws, rules, regulations, court orders and public safety and other official requirements in effect in each of the countries where we operate.
- Personnel recruitment and management.



D. Transfers of Personal Data

The Transfer and/or Transmission of Personal Data shall be governed by a legally binding instrument that sets forth the parties' obligations and duties regarding the Protection of Personal Data in accordance with applicable laws in each country.

We may transfer Personal Data relating to the Data Subjects to fulfill our service obligations in the following cases:

- To competent authorities where required by law or upon a duly substantiated written order of a court of competent jurisdiction.
- To Subsidiaries or affiliates subject to the same Privacy standards as América Móvil.
- To our business partners.
- To Third Parties that may become involved in the provision of the Services we offer or which we are asked to provide.

As to our Employees, we may transfer Personal Data relating to them 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; and
- To recruiters and other third parties 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 transfer 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 transferred.

We will only share Personal Data with territories and/or third parties able to guarantee that Personal Data will be protected in accordance with applicable laws, rules and regulations, and that appropriate safeguards are in place to protect the fundamental rights and freedoms of Data Subjects.



E. Retention of Personal Data

We will only retain Personal Data in accordance with the principles of necessity to meet the purposes previously informed to Data Subjects in the relevant Policy and/or Privacy Notice, to provide the Services requested and to fulfill our legal or contractual obligations, as the case may be.

However, under certain circumstances and if justified under the law, we may further retain such Personal Data as 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, 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

Under applicable laws in each of the countries where we operate, Data Subjects may have the right to access their Personal Data, free of charge and in a way that is accessible, electronically or otherwise, in a structured, machine-readable format, including a copy of such data, and to be informed of the characteristics of any Personal Data Processing activities (right of access and data portability); to have inaccurate Personal Data concerning them rectified or updated (modification or rectification); to obtain the erasure of Personal Data that are no longer necessary in relation to the purposes for which they were processed (erasure); to object to the processing of Personal Data concerning them for certain specific purposes, provided such data is not necessary for the performance of our contractual obligations and/or the provision of Services (object); and to request the establishment of safeguards to prevent their alteration, erasure or suppression (restriction of Processing).

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. Security and Confidentiality of Personal Data Processing

América Móvil has adopted high Security standards to ensure the ongoing integrity, availability and Confidentiality of information in accordance with requirements set forth in applicable laws and with 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 to safeguard Personal Data at any stage of Processing, against any event that may result in the loss or unauthorized access, use, disclosure or Processing of such data.

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

We monitor on an ongoing basis the adequate operation of our systems, applications and technological infrastructure to ensure that Privacy and Personal Data are protected appropriately. Notwithstanding the foregoing, the Security and/or Confidentiality of Personal Data may be compromised by certain incidents. In such cases, we will take action in accordance with our Information Security Policy and with such other policies and/or procedures as designated for each operation. In addition, if we determine that a Security incident may have compromised the fundamental rights and/or freedoms of the Data Subjects we will, where required by law, notify the Security incident to the Data Subjects concerned and/or to the supervisory authority having competent jurisdiction in order to prevent any further impact on their rights.

You and all other Employees of América Móvil must understand and comply with the measures adopted by the Company to guarantee the Security and Confidentiality of Personal Data in its possession. Any infringement of such Security measures may place our Company and/or the Data Subjects at risk and could give rise to disciplinary actions by the Company and/or sanctions by competent authorities.

A. Pseudonymization and Minimization

When Processing Personal Data, we will endeavor to process and limit the collection of Personal Data to the minimum extent necessary for the purposes for which they are requested. Accordingly, we will make our best efforts to avoid Processing Personal Data that are excessive and/or are not relevant to the purposes for which they are processed. In particular, we will make every effort to limit the Processing and the processing periods of Sensitive Data or special categories of Personal Data.

Where possible, we will use pseudonymization techniques to mitigate the Risks inherent to certain Personal Data Processing.

5.7. Data Protection Training

As part of our Privacy Program, we will establish a comprehensive training program to build awareness of our Personal Data Protection obligations among all our Employees. The program will include (i) an introductory online course, (ii) a Privacy toolkit including



internal policies, directives, comparisons and other information accessible through our intranet Privacy webpage, 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.

5.8. 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 Data is handled appropriately, consistent with the principles and duties set forth in this Policy.

In order to ensure our Subsidiaries' compliance with our Privacy Program, the Data Protection Officer of América Móvil will require all Subsidiaries to regularly submit reports, so that Privacy and Personal Data Protection issues are monitored on an ongoing basis.

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

5.9. 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 person is authorized to listen to or monitor any conversation, data transmission or other form of communication, nor disclose its existence or content, unless a competent authority submits a duly substantiated and legally justified written order as provided by law. However, América Móvil will not be able to inform the subscriber about any order issued by an authority having jurisdiction.



- Notwithstanding the foregoing, it will be possible to provide information about individuals, geolocate, block or restrict a mobile line or keep track and control of communications where required by law, provided that the relevant request is made in writing in the form of a duly substantiated, legally justified official communication issued and executed by a competent authority.

5.10. Requests of Competent Authorities

Those of our Subsidiaries devoted to the provision of telecommunications Services are required, as telecommunications concession holders or licensees, and/or authorized to locate and provide the location of lines in real time, preserving, recording and providing certain types of data concerning the users of their Services and make such data available to the authorities for investigation, law enforcement, crime prevention or legal compliance purposes, prior written request in the form of a duly substantiated and legally binding official communication issued and executed by the relevant authority, whether in physical form or electronic format, and/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, take down or remove certain types of online content. However, in any such case we will thoroughly review and analyze the relevant request 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 guarantees or protections against government access to Personal Data, and that in certain cases we will be required by law to cooperate with the government in matters pertaining to security and law enforcement without prior notice to Data Subjects. Notwithstanding the foregoing, we will thoroughly review and analyze each request to comply with the law and protect, to the extent legally and materially possible, the Privacy of Data Subjects using our Services.

We at América Móvil are committed to the protection of human rights and freedom of expression.

For this reason, providing information to enforcing authorities is only allowed where required by law and in any event 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 specific criteria to verify the validity of requests from authorities.



5.11. Privacy Policy Changes

Data Subjects must be informed of any and all changes to local Privacy policies by means of a notice posted in the relevant website(s), including the date on which such changes will come into effect.

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 our 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 erase 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 strive to continually improve 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 run information dissemination 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 an enforcing 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.
- Transferring Personal Data to third parties that do not provide any guarantees regarding their full compliance with Personal Data Protection standards. Transferring Personal Data to a Third Party service provider, unless we first verify that such third party provides adequate conditions and safeguards for the Protection of Data.
- Transferring 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 our duties.
- Accessing Personal Data unless access is necessary or we are expressly directed to do so.



7. Policy Compliance Oversight and Verification

The Compliance Officer, the Subsidiary's Compliance Officer and Internal Audit are responsible for supervising, overseeing and, if applicable, auditing the due compliance of provisions in this Policy, periodically assessing its effectiveness.

The Compliance Officer and the Privacy Team are responsible for the ongoing assessment of the Privacy Program, including, among other things, a series of measures designed to prevent any breach of applicable Personal Data Protection laws, rules and regulations. They are also responsible for providing guidance to Employees regarding this Policy, via this email address privacidad@americamovil.com, along with line managers.

If any audits are necessary, they will be conducted regularly and randomly in the various departments of the Company.

All Company Employees must support and cooperate with the work teams in charge of such audits, refraining from obstructing or blocking audit processes and from providing incorrect or false information.

Remember that we all must comply and ensure compliance with this Policy and report any act contrary to it, through the Whistleblower Portal <https://denuncias.americamovil.com/>

8. Training and Dissemination

It is extremely important for us to understand and implement all actions described herein, and with the purpose of promoting a culture of transparency, ethics and values, América Móvil offers its Employees and Third Parties online or in-person courses, which will be promoted through the Company's official means of communication, in order to provide training to help them understand the concepts, scope, and situations that may occur during daily operations, and to express any concerns they may have.

We at América Móvil or its Subsidiaries are responsible for attending the allocated sessions, complying with the specified times and requested assessments.

As Employee of América Móvil, you are responsible for disclosing the terms and principles of this Policy and inviting any Third Parties with whom you have business relationships to comply with them.

9. Cooperation and Coordination

The Compliance Officer is responsible for preparing and making its best efforts to harmonize the Company's Privacy and Personal Data Protection Policy. However, the Subsidiaries will be responsible for complying with applicable legal obligations before the Authorities of each individual country.

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Accordingly, Subsidiaries should have a legal compliance internal procedure adapted to specific Personal Data Protection obligations in each country.

Furthermore, Subsidiaries shall ensure that they have in place efficient mechanisms that may allow them to cooperate and, as applicable, coordinate internal efforts to develop and implement policies and activities designed to duly protect Privacy and Personal data in general.

10. Sanctions

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 authority of last resort to determine sanctions in the event of default of this Policy, without prejudice to such defaults being also penalized by applicable laws and authorities having jurisdiction.

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.

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.

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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 reports 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

If you have questions, comments or suggestions regarding this Policy, please contact us in the following email address: privacidad@americamovil.com