

**PRIVACY STATEMENT  
EMPLOYEES**

**A. Identity and address of the person in charge**

**Sim Tech Holdings, LLC** (hereinafter and interchangeably **HOLDER** or the Responsible Party), with address at 5705 Timber Star, San Antonio Texas, 78250; expressly informs you:

**B. Personal data collected and subjected to processing**

In order to fulfill the purposes stated in this Privacy Statement, we collect the following categories of personal data:

1. Identification and contact information;
2. Personal characteristics data;
3. Social circumstances data;
4. Academic and professional data;
5. Employment data;
6. Commercial information data;
7. Economic, financial and insurance data;
8. Transaction data; and
9. Sensitive personal data (fingerprint, present and future health data; union membership).

The personal data of third parties provided to the Controller for the fulfillment of the purposes identified in this Statement shall be so provided if the holder has informed such third parties of the existence of the processing of their personal data by the Controller.

Parents and/or guardians may at any time exercise their rights of access, rectification, cancellation and opposition or revoke their consent to the processing of personal data of minors that they have provided for any of the purposes set forth in this Statement, and in those cases where the applicable legislation in force so permits.

**C. Sensitive personal data**

Information about the present and/or future health status of an identified or identifiable person is classified and protected as sensitive personal data. The Responsible will treat such information confidentially and with the security measures required by the applicable regulations. We will request or generate sensitive personal data for our internal health care service, and for the proper conformation of your medical record by the corresponding area.

When legally required or when the Responsible Party so determines, we will request your express written consent prior to any processing of sensitive personal data as a collaborator. The aforementioned consent may be obtained by any physical or electronic means that accredits its granting, such as: forms, service forms, orders or letters of authorization.

**D. Purposes of treatment**

**a) Original and necessary purposes:**

1. Management of the process of employee registration prior to the hiring process.
2. Personnel management, control and administration, including training and development.
3. Management of employee history files.
4. Management of employee medical records.
5. Payroll management, control and administration.
6. Management, control and administration of benefits and employee benefits.
7. Documentation and control of the allocation of computing and electronic communications assets.
8. Creation of the institutional e-mail account and assignment of profiles in the HOLDER systems.
9. Assignment of IT resources according to the functions of each employee, as well as access keys and passwords.

10. Communication of corporate, labor and administrative information related to your group or position in HOLDER.
11. Measurement of labor results through procedures established by HOLDER.
12. Ensure compliance with confidentiality, honorability and transparency obligations, through the implementation of administrative and technical procedures established by HOLDER for such purposes.
13. Contact family members, financial dependents or emergency contact person.
14. Historical and statistical records of employees.

**b) Additional purposes:**

1. Communication of activities and events to promote and improve the integration of HOLDER employees.
2. Communication of non-work activities to promote activities for the benefit of our employees or the community.

**E. Transfers of personal data**

Your personal data may be transferred and processed by persons other than HOLDER in the following cases:

1. **Controlling companies, subsidiaries or affiliates of the responsible party, or to a parent company;** for purposes of centralized safeguarding of information; control of registrations and cancellations; maintenance, follow-up and updating of the Services; compliance with obligations derived from the applicable legislation or international treaties, as well as for the performance of statistical functions and historical record of clients and users.
2. **Public agencies;** Public administrations at federal, state or municipal level; Commissions; Institutes and/or Regulatory Entities, for compliance with information, transparency and prevention of illegal activities obligations; as well as for compliance with judicial or administrative requirements issued by competent authorities.
3. **Banks or other financial entities;** for the fulfillment of payment obligations in favor of HOLDER's collaborators.
4. **External professional advisors and/or service providers;** in order to provide the necessary services to comply with labor benefits; to facilitate the performance of functions within or for HOLDER aimed at fulfilling the legal relationship with our employees.
5. **Health professionals;** when such transfer is indispensable for medical care, prevention, diagnosis, provision of health care, medical treatment or management of health services, as long as the holder is not in a position to grant consent, under the terms established by the applicable legal provisions and that such data processing is carried out by a person subject to professional secrecy or equivalent obligation.
6. **Providers of personnel training services; in order** to comply with the internal training and development processes that the Responsible Party considers necessary to comply with its internal processes and, if applicable, with the applicable regulations.

Your consent is not required for the above transfers. Any other transfer of your data will not be carried out without your consent and prior information.

**F. Exercise of data protection rights**

In all legally appropriate cases, you may at any time exercise your rights of access, rectification, cancellation and opposition through the procedures we have implemented for such purposes.

The request for the aforementioned rights must comply with the requirements established in the legislation in force, by writing to our Personal Data Department, at the address indicated at the beginning of this Statement.

The application must contain and be accompanied by the following:

1. Your name and address or other means of communicating a response to your request.
2. Documents proving their identity or, if applicable, legal representation.
3. A clear and precise description of the Rights you wish to exercise; and
4. Any other element or document that facilitates the location of personal data.

We will notify you of our decision within twenty business days from the date we receive your request. If the request is granted, it will be effective within fifteen business days from the date we communicate the response. In the event that the information provided in your request is erroneous or insufficient, or the necessary documents to prove your identity or the corresponding legal representation are not accompanied, the Responsible Party will require the correction of the

deficiencies within five working days following the receipt of your request in order to process it. In these cases, you will have ten working days to comply with the requirement to correct the deficiencies. The corresponding request will be considered as not submitted if you do not respond within such term.

Alternatively, you may address your request to our Personal Data Department through the e-mail address: [soporte@simdatagroup.com](mailto:soporte@simdatagroup.com), complying with all the requirements listed above, establishing as Subject of the communication "Data protection rights" and/or Revocation of consent". The deadlines of the procedure will be the same as those mentioned in this section. The use of electronic means for the exercise of the aforementioned rights authorizes the Data Controller to respond to the corresponding request through the same means, unless the holder himself/herself indicates another means, clearly and expressly.

You may obtain the information or personal data requested through simple copies, electronic documents in conventional formats (Word, PDF, etc.), or through any other legitimate means that guarantees and accredits the effective exercise of the right requested.

You will be responsible for keeping your personal data in possession of Responsible updated. Therefore, you guarantee and respond, in any case, the truthfulness, accuracy, validity and authenticity of the personal data provided, and undertake to keep them properly updated, communicating any changes to Responsible.

#### **G. Revocation of consent**

You may revoke your consent to the processing of your personal data, without retroactive effect, in all those cases in which such revocation does not involve the impossibility of fulfilling obligations arising from a legal relationship in force between you and the Controller or involve the breach of general provisions of public order that establish the obligation to maintain the processing of your personal data for a certain period of time.

The procedure for the revocation of consent, if applicable, will be the same as that established in the immediately preceding section for the exercise of your rights.

#### **H. Limitations on the use and disclosure of your personal data**

You may limit the use or disclosure of your personal data by directing the corresponding request to our Personal Data Department. The requirements to prove your identity, as well as the procedure to attend your request will be the same as those indicated in the section "Exercise of data protection rights".

The Data Controller has the means and procedures to ensure the inclusion of some of your data in its own exclusion lists, when you expressly request their inclusion in them. The Controller will provide registered owners with the corresponding registration certificate.

#### **I. Automatic means of collecting personal data**

On our website we use files known as "cookies" to facilitate navigation and communication through our website. If you visit our website and/or send information through it, the cookies we use allow us to collect, analyze and store technical information related to your browsing habits and the use of such communication channels. Cookies allow us to collect this information automatically, at the very moment the user makes use of our electronic services.

You can disable the installation of cookies in your Internet browser. For more detailed information about cookies and how to prevent their installation, we recommend visiting the site [www.allaboutcookies.org](http://www.allaboutcookies.org). We also inform you that, if you disable the installation of cookies, you may not be able to use certain sections or services of the website.

#### **J. Modifications or updates to this Privacy Statement**

The Responsible Party may modify, update, extend or otherwise change the content and scope of this Privacy Statement, at any time and at its sole discretion. In such cases, we will publish such changes on our website, Section "Privacy Statements".

Changes to this Privacy Statement may also be communicated by e-mail, when such means has been established as a communication channel between the Holder and the Controller, during the term of any legal relationship.

**K. Refusal of treatment**

I do not wish to receive communications of activities and events to promote and improve the integration of HOLDER collaborators.

I do not wish to receive communications from non-work events to promote activities for the benefit of our employees or the community.

If you have had access to this Privacy Statement by electronic means or if you wish to communicate this refusal at any time after the delivery of your personal data, you can communicate this decision through the means established for the exercise of data protection rights.

**Date of last update:  
December 2020**