

## PRIVACY NOTICE OF HSBC FINANCIAL GROUP AND ITS AFFILIATE AND SUBSIDIARY COMPANIES.

Pursuant to what is provided in the Federal Law for the Protection of Personal Data in Possession of Individuals and its Ruling, this Privacy Notice is issued under the following terms:

### ■ RESPONSIBLE OF PERSONAL DATA.

For the purposes of hereby Privacy Notice, Grupo Financiero HSBC, S.A. de C.V. and its affiliates and subsidiary companies (hereinafter “**Grupo HSBC México**”<sup>1</sup>), appoint HSBC México, S.A., Institución de Banca Múltiple, Grupo Financiero HSBC, (hereinafter “**HSBC México**”) as the Responsible of receiving, spreading, store, use (including the access), managing, making good use, transfer or use personal data (hereinafter “**Tratamiento**”), with official address at Paseo de la Reforma number 347, Colonia Cuauhtémoc, Delegación Cuauhtémoc, C.P. 06500, Mexico City.

### ■ INFORMATION TO COLLECT.

We notify you that HSBC Mexico will get your personal data through the following methods:

- 1. Personally:** When you come to any of the branches and modules of HSBC México or to the Grupo HSBC Mexico Offices, and when our RMs visit you at your address or facilities, in order to request or process our financial products or services.
- 2. Direct:** When you provide us with your personal data, requesting or hiring our financial services, included a pre assessment and assessment to participate into special offers, raffles, and programs, through our web site, ATMs, telephone calls, cloud computing<sup>2</sup> or any other technological means.
- 3. Indirect:** From any other documentary or information source commercially available, or allowed by Law; and when they are provide by other data owner, a reference or a reference to provide hired services, it will be deemed as complete and correct, as long as the data owner does not state otherwise or submits a data update request.

The personal data categories to be collected, which are bound to be managed are:

- a) ID data and contact, including the image of the holder of the personal data.
- b) Wealth assets data
- c) Financial data
- d) Academic data
- e) Working data
- f) Migration data

The data categories which are sensible<sup>3</sup> to collection are bound to be managed are:

- g) Physical health status
- h) Physical features and conditions
- i) Personal features
- j) Ideological information
- k) Union or political affiliation
- l) Origin information
- m) Information about infants or child
- n) Biometric data<sup>4</sup>, consistent with the fingerprint, voice recognition, facial identification treats, iris and those determined by the authorities, in order decide and register the identity.

The management of the personal data is taken as authorized when it is assumed that the specific authorization by the signature and authentication means set up by HSBC Mexico do reasonably correspond to the holder of the personal data.

Once you provide third party personal data, personal references, references, beneficiaries and additional cardholders to the one in charge in order to fulfil the identified goals, you should advise the third parties about the transfer and purpose of their personal data.

#### ■ DEFINITE PURPOSE THAT THE MANAGEMENT OF PERSONAL DATA WILL BE BOUND TO.

The management of the owner's personal data, including sensible personal data collected, and except the owner states otherwise through the means described in hereby Privacy Notification, the definite purpose is to use them for counselling, hiring, placing, marketing and financial and product services operation, risk identification when hiring and designing products, benefits, rebates, market research, credit background information, notifications about changes in conditions and meeting legal requirements from the corresponding domestic and international authorities and the resulting obligations from the legal relation between the personal data owner and Grupo HSBC México and/or its affiliate and subsidiaries.

Also, HSBC Mexico may use their personal data to meet clarifications and complaints, the design, development, analysis, profiling, advertisement, product and services advertising, surveys and to notify about raffles, merchandising goods resulting from operating our products, as well as the access control. In case you do not want your personal data to be processed for the purposes indicated above, you can present your Opposition request from this moment by sending an email to [Mexico\\_ARCO@hsbc.com.mx](mailto:Mexico_ARCO@hsbc.com.mx).

For minors who become legal age, it will be understood as consented to the processing of their personal data, under the terms agreed by the guardian, until the Holder does not state otherwise.

The processing of your personal data is also subject to automated decision-making procedures, without human intervention.

HSBC Mexico will keep your personal data during the term of the contractual relationship or in accordance with the applicable legislation.

The Owner has a five-working-days term after the date in which his personal data were obtained so that, if that is the case, can state his refusal to the management regarding the unnecessary purposes before the ARCO Office, nor did they originated the legal relation with the Responsible person.

#### DATA IN SOCIAL NETWORKS

By logging in our social networks will be understood that the user's data (Holder of personal data) are correct and his username is his responsibility. In this sense, Grupo HSBC México is not responsible for any impersonation in any of the social networks that are handled.

Social networks (such as Facebook®, Twitter®, WhatsApp® and LinkedIn® among others) constitute a platform for communication and interconnection between digital platforms of different users, being outside of HSBC Mexico Group, therefore, are not found under the responsibility of Grupo HSBC México. However, in order to maintain effective, dynamic and immediate communication with our customers and users, these or other communication platforms may be used to comply with the purposes of this Privacy Notice.

The user profile's security is the responsibility of the owner of the social network account, likewise, every user who is logging in a Social Network obligatorily accepts their Declarations of Rights and Responsibilities (DDR) for example if you are a Facebook® user is because you expressly accepted and therefore from the beginning of the relationship, all aspects related to privacy, protection of personal data, intellectual property of contents and other aspects, are regulated by said clauses, and these information becomes personal data located in sources of public access.

#### ■ OPTIONS AND MEANS THAT HSBC MEXICO OFFERS TO THE OWNERS OF PERSONAL DATA, IN ORDER TO LIMIT THE USE OR SPREADING OF THEIR PERSONAL DATA.

If you wish to stop the calls from advertising companies, product and benefit offers, there is an additional option to exercising your Right to Objection, the subscription to the Public Registry of Users (REUS, in Spanish) managed by the Mexican Commission for the Protection and Defense of Users of Financial Services (CONDUSEF).

The Owner's personal data will be kept under stringent confidentiality, pursuant to the management, technical and physical security measures implemented by HSBC Mexico in its security policies and procedures.

HSBC Mexico uses "cookies" that can be downloaded into your computer and access to them, which allows starting a session for HSBC Mexico services, according to their personal experience on-line, storing their preferences in the computer in order to save time, thus removing the requirement to repeatedly ask for the same information and showing customized content only and appropriate advertisement in the next visits to the web site. A cookie is a text file placed by a web page server into the computer's hard disk. Also, HSBC uses web beacon: an image exclusively used to quantify the number of visits of the customer.

The computer's configuration may accept cookies automatically, but if the customer prefers so, the configuration can be modified as to reject the cookies. If you choose so, it won't be possible for HSBC Mexico to store your preferences into the web site.

#### ■ MEANS TO EXERCISE THE RIGHTS OF THE HOLDER

In order to protect the our customers' personal data, privacy and reliability, we make available our ARCO Office, where the Owner of personal data can limit their use or disclosure at any time, as well as denying or revoking the authorization to manage said data, be exercising the rights to access, rectification, cancellation or objection stated by Law.

In order to exercise the rights to access and rectification should come to any of HSBC Mexico's branches with the identity documents or, if applicable, the legal representation of the Owner.

Where requests of rectification of personal data, the Owner should fill out the "Data update template" and point out the amendments to be made to the identity related data related for all his products and services, as well as submitting the documentation to support the request. HSBC Mexico, as responsible of the personal data, can go forward and update the personal data only with the documentation and evidence to support that the Owner's information in our records is not accurate, complete, correct and current, considering the last information provided by the Owner or correspondent authority.

Regarding the exercise the rights to cancellation and objection, he should submit the request in written, which can be downloaded from our web page or obtained at any HSBC Mexico branch, e-mailing it to [Mexico\\_ARCO@hsbc.com.mx](mailto:Mexico_ARCO@hsbc.com.mx), or going to the ARCO office located at Paseo de la Reforma Num. 355, Planta Baja, Col. Cuauhtémoc, Delegación Cuauhtémoc, C.P. 06500, Ciudad de México or calling our Contact Centre in Mexico City and Metropolitan area, at 5721-3390 and 01800-7124825 from the rest of the country.

The request to exercise the rights should bear the following:

- a) Name and address of the Owner, or any other means to convey the reply to the request;
- b) The official ID documents or, if applicable, the Owner's legal representation;
- c) The clear and accurate description of personal data regarding of which to exercise some of the rights mentioned above, and
- d) Any other element or document which eases the location of the personal data.

In light of the legal or natural incapacity, as in the case of minors or disabled persons under the legal guardianship of a third party, they may exercise their rights of Access, Rectification Cancellation and Opposition in the terms described above, through the legal guardian, requires identification and accreditation of who acts as a tutor.

In the case of the exercise of the Rights of Access, Rectification, Cancellation and Opposition, these may be fully attended, provided there is no legal impediment, no law or any provision applicable to HSBC Mexico which contravenes or does not imply using or affect the rights of any other Holder, that is, if the personal data(s) requested to be known contains, implies or reports personal data of another Holder, it may be denied the granting of said data unless expressly stated consent of the owner of the personal data requested by another Holder in the exercise of his right of access.

The Responsible shall communicate in writing to the Holder, legal representative or guardian, the response to your request through the contact means provided in the same, for this purpose, within a maximum period of twenty working days, counted from the date of receipt of such request in the ARCO office. The period may be extended once only for an equal period, provided that this is justified by the case circumstances.

The response given by HSBC Mexico may anticipate to direct the Holder's request to other of the instances belonging to the *Grupo HSBC Mexico*, specifying which one (s) are assigned to look after a part or the total content of the request in

order to solve quickly and completely the Holder's request, this would not imply a refusal or omission to the request because it is part of the response and it is assured to be solved by such instances belonging to *Grupo HSBC Mexico*.

Not in all cases the *Grupo HSBC Mexico* will be able to look after your request or remove immediately the treatment of your personal data as it is possible that for some legal obligation we need to keep processing your personal data. Likewise, you must consider that for certain purposes, the revocation of your consent for your personal data processing will mean that we cannot continue to provide the service you requested, or your legal relationship termination with us.

- **Means to ensure the receipt of the response**

HSBC México may, within 15 business days after the response's communication, contact the Holder who made the request for ARCO Rights, which may be done through the means of contact provided in his request for this purpose. In order to confirm that it was received by the Holder, as well as granting the option of stating whether such response to that request fully fulfilled what is requested in it for the ARCO Rights exercise, the foregoing in compliance with the provisions of Article 98 second Paragraph of the Regulation of the Federal Law on the Protection of Personal Data in the possession of Individuals that reads "The response to the Holder should refer exclusively to the personal data specifically specified in the corresponding request."

- **Approval for the response**

Before the express manifestation of the Holder through any electronic, optical, sound, visual, mean or any other technology confirming that the response granted by HSBC Mexico fulfilled what is stated in its request for ARCO Rights. HSBC México may use a letter or format in which it reiterates the request for ARCO Rights made by the Holder, as well as confirming that the response to it granted by HSBC Mexico who satisfactorily fulfilled the request for ARCO Rights, such letter or format must be signed by the Holder as an approval for looking after your request.

- **Amendment or confirmation of the response**

In the event that the Holder expresses his disagreement with the response granted by HSBC Mexico, he may be offered a second review with the purpose of modifying or confirming the initial response to his request, which will be communicated to the Holder in accordance with Process used to grant the previous response, the above in the established period of 15 working days after the response to the ARCO request is communicated.

For more information on the protection of your personal data, or when you consider that your Access, Rectification, Cancellation or Opposition rights were not properly addressed, you can contact our Department of Personal Data Protection via email: [Mexico\\_ARCO@hsbc.com.mx](mailto:Mexico_ARCO@hsbc.com.mx)

- **TRANSFER OF PERSONAL DATA**

HSBC México may be able to perform the transfer and/or submission<sup>5</sup> of data to:

1. The affiliated companies and subsidiaries of the *Grupo HSBC Mexico* and the HSBC Group at an international level.
2. Third party service providers for compliance with the legal obligations acquired by HSBC Mexico or by any of the affiliated companies and subsidiaries of the *Grupo HSBC Mexico*.
3. Third party providers of research services, data analysis, sending of information focused on the Holder's needs on personal data, as well as in the performance of financial services needed or required by the personal data holder.
4. Business partners with whom HSBC Mexico or any of the companies of the *Grupo HSBC Mexico* celebrate agreements or contracts focused on the development and commercialization of new products and/or financial services for the Holder's benefit and according to their needs and the Background and credit history research.
5. Entities that provide banking correspondent service.
6. Third parties arising from a corporate restructuring, including, merger, consolidation, sale, liquidation or transfer of assets.
7. Financial entities or commercial companies, national or foreign, derived from requests for direct debiting, contracts termination via another financial institution, transfer of resources, among others, requested by the customer, as well as by virtue of subrogation, assignment, discount or transmission, by any means, of HSBC México's portfolio, in accordance with the applicable legal provisions and/or the corresponding governmental authorizations.
8. Service Providers called cloud computing, as long as they are used for the purposes indicated in this Privacy Notice.
9. Applicable and auxiliary authorities.
10. Other transmissions under that Act and its Regulations.

Third parties and entities receiving personal data, assume the same obligations and/or responsibilities of HSBC México, in accordance to what is described in this Privacy Notice. If the personal data treatment is different from the purposes described in this Privacy Notice, the Third Party or the Person in Charge will assume the role of Person in charge of the personal data processing.

The personal data Holder who generates any request to enter into a legal relationship with HSBC Mexico or any of the companies of the *Grupo HSBC Mexico* accepts the transfer of their personal data in the terms described in this Privacy Notice.

## ■ AMENDMENTS TO THE PRIVACY NOTICE

HSBC México reserves the right to make updates to this privacy notice, any changes or amendments will be informed through any of the following means:

1. Notices at the HSBC México branches;
2. Notices on HSBC Mexico's Internet portal ([www.hsbc.com.mx](http://www.hsbc.com.mx));
3. Account Statements; and
4. Any other public or private means of communication provided for in the contracts that cover the transactions entered into between the Holder and HSBC Mexico or by any of the companies of the *Grupo HSBC Mexico*.

The Owner is recommended to consult the Privacy Notice, at least half-yearly, so he can be updated of the terms and conditions of it. In any case, it is available to you, directly and personally in our customer service channels, including any electronic, optical, sound, visual mean, or any other technology.

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<sup>1</sup> Grupo Financiero HSBC, S.A. de C.V.; HSBC México, S.A., Institución de Banca Múltiple, Grupo Financiero HSBC; HSBC Seguros, S.A. de C.V., Grupo Financiero HSBC; HSBC Casa de Bolsa, S.A. de C.V., Grupo Financiero HSBC; HSBC Global Asset Management (México), S.A. de C.V., Sociedad Operadora de Fondos, Grupo Financiero HSBC; HSBC Servicios, S.A. de C.V., Grupo Financiero HSBC; HSBC Pensiones, S.A.; HSBC Servicios Financieros, S.A. de C.V.; Inmobiliaria Grufin, S.A. de C.V.; Inmobiliaria Guatusi, S.A. de C.V.; Inmobiliaria Bisa, S.A. de C.V.; Inmobiliaria Banci, S.A. de C.V.; HSBC Inmobiliaria (México), S.A. de C.V.; Mexicana de Fomento, S.A. de C.V.; Fundación HSBC, A.C.; HSBC-D1, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC-DG, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC-DE, S.A. de C.V., Sociedad de Inversión de Instrumentos de Deuda; HSBC-D2, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC-D9, S.A. de C.V., Sociedad de Inversión de Instrumentos de Deuda; HSBC-V2, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC-V3, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC-D7, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC-FF, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC-D10, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC DH, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC E3, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC E2, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC DL, S.A. de C.V., Sociedad de Inversión en Instrumentos de Deuda; HSBC Fondo Global 1, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC Fondo 1, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC Fondo 3, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC Fondo 4, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC Fondo 5, S.A. de C.V., Sociedad de Inversión de Renta Variable; HSBC Fondo 6, S.A. de C.V., Sociedad de Inversión de Renta Variable, Promoción en Bienes Raíces, S.A. de C.V., as well as any investment company incorporated or constituted by HSBC and any other company that is constituted by Grupo HSBC Mexico as an Affiliate or subsidiary.

<sup>2</sup> It is a general term to refer to anything that has to do with the provision of information and data hosting services through the internet. These services are divided into three major categories: Infrastructure as a service (IaaS), Platform as a service (PaaS) and software as a service (SaaS).

<sup>3</sup> Sensible data are considered those that may reveal aspects such as racial or ethnic origins, present and future health status, genetic information, religious, philosophical and moral beliefs, union affiliation, political opinions, sexual preference, medical questionnaire with diseases or illnesses, surgical interventions, inability, disability, deformity, lack of a member, sexually transmitted infections, use of drugs, if in pregnancy, medical history of relatives with diseases or illnesses, as well as medical studies.

<sup>4</sup> Biometric data are those physical, biological or behavioral characteristics of an individual that identify him as unique from the rest of the population.

<sup>5</sup> Submission: The communication of personal data between Grupo HSBC Mexico as Responsible for personal data and its Managers (for example suppliers), inside or outside of Mexican territory.