

PRIVACY NOTICE

Personal Data

Clients & Prospects · Comprehensive Notice · ARCO Rights

This Privacy Notice is issued in compliance with the Mexican Federal Law on the Protection of Personal Data Held by Private Parties (hereinafter "LFPDPPP"), its Regulations, and the Privacy Notice Guidelines issued by INAI.

1. PERSONAL DATA WE COLLECT

ZAIPEX collects and processes the following categories of personal data in connection with our commercial, service, or prospecting relationships:

1.1 Identification and contact data

- Full name or company name
- Corporate and personal email address
- Landline and mobile phone number
- Job title and department within the organization

1.2 Tax and commercial data

- Tax ID (RFC) and Fiscal Identification Code
- Legal entity name and trade name
- Fiscal address and delivery address
- Tax regime and CFDI usage
- Agreed commercial terms and pricing

1.3 Banking and billing data

- Bank account number or CLABE interbank code for transfers
- Bank name and branch
- Corporate card data for payments (last 4 digits only; we do not store the full number)
- Payment history and issued invoices

1.4 Platform and dashboard usage data

- IP address and browser or device type
- Access logs, connection times, and actions performed within platforms
- Dashboard configuration and customization preferences
- Operational data and business metrics shared by the data subject for service delivery

ZAIPEX does not collect sensitive personal data (racial origin, health status, political affiliation, religious beliefs, sexual life) from its clients or prospects. If required for a specific service, express written consent will be requested.

2. PURPOSES OF PROCESSING

2.1 Primary purposes (required for the contractual relationship)

The data is required for the following purposes; without it, we cannot provide the contracted service:

- Identify the client or prospect and manage the commercial relationship.
- Prepare and send quotes, technical proposals, and contracts.
- Deliver the contracted data engineering, data science, BI, machine learning, and artificial intelligence services.
- Issue electronic invoices (CFDI) and manage service payments.
- Provide technical support, incident resolution, and platform maintenance.
- Comply with applicable legal, tax, and accounting obligations.
- Manage access to and use of platforms, dashboards, and tools delivered to the client.

2.2 Secondary purposes (marketing and analysis)

The following purposes are not required for service delivery; if you do not wish your data to be processed for these purposes, you may opt out as described in Section 5:

- Sending commercial communications, newsletters, case studies, and ZAIPEX updates.
- Invitations to events, webinars, and Zaipex Labs publications.
- Internal statistical analysis of service preferences and usage to improve our offering.
- Commercial prospecting for new ZAIPEX services or products.

3. PERSONAL DATA TRANSFERS

ZAIPEX may transfer your personal data in the following cases without requiring your consent, as permitted by the LFPDPPP:





- **Competent authorities:** in compliance with legal obligations, judicial, or administrative requirements.
- **Cloud infrastructure providers:** AWS, Google Cloud, or Azure, solely for data hosting with security levels equivalent to or exceeding those required by the LFPDPPP.
- **Electronic invoicing providers (PAC):** authorized by the Mexican Tax Authority (SAT) for the issuance of CFDIs.

ZAIPEX will never sell, assign, or transfer your personal data to third parties for their own commercial purposes, unless express consent is given by the data subject.

When a transfer requires consent, you will be informed in advance and your authorization will be requested.

4. ARCO RIGHTS AND HOW TO EXERCISE THEM

As a data subject, you have the following rights:

 ACCESS	 RECTIFICATION	 CANCELLATION	 OPPOSITION
Know what personal data we hold about you, how we use it, and to whom we have transferred it.	Request correction of your data when it is inaccurate, incomplete, or outdated.	Request deletion of your data from our records when you consider it is no longer necessary.	Object to the processing of your data for specific purposes, particularly for advertising.

Additionally, you have the right to:

- **Revoke your consent:** at any time, for purposes that require it, without retroactive effect.
- **Limit the use or disclosure of your data:** request that your data not be processed for secondary purposes or transferred to third parties.

4.1 Procedure to exercise ARCO rights

To exercise any of your rights, send a request to the email address privacy@zaipex.ai with the following:

- Full name and email address registered with ZAIPEX.
- Copy of valid government-issued ID (INE, passport, or professional license).
- Clear description of the right you wish to exercise and the data it refers to.
- For rectification requests, documentation supporting the correction.
- For legal representatives, document proving legal authority.

ZAIPEX will acknowledge receipt within 5 business days and respond according to the timelines established by the LFPDPPP:

Request type	Response time	Effective within
Access to personal data	20 business days	15 business days

Rectification	20 business days	15 business days
Cancellation	20 business days	15 business days
Opposition	20 business days	15 business days
Withdrawal of consent	20 business days	15 business days
Limitation of use or disclosure	20 business days	Immediate

Responses will be sent to the email address provided. If your request is approved, it will take effect within the timeframe indicated in the table above.

5. OPT-OUT AND WITHDRAWAL OF CONSENT

If you do not wish your data to be processed for the secondary purposes described in Section 2.2, or if you wish to withdraw your consent for any purpose that requires it, you can:

- **Send an email to:** privacy@zaipex.ai with the subject line "OPT-OUT SECONDARY PURPOSES" or "WITHDRAWAL OF CONSENT"
- Click the unsubscribe link included in any commercial communication we send you.

Opting out or withdrawing consent does not affect the primary purposes required for providing the contracted service. ZAIPEX cannot cease processing data when doing so is necessary to comply with ongoing legal or contractual obligations.

6. COOKIES AND TRACKING TECHNOLOGIES

ZAIPEX websites and platforms may use cookies and similar technologies (pixels, web beacons, analytics scripts) for the following purposes:

- **Essential cookies:** required for platform functionality (authentication, sessions, security). These cannot be disabled.
- **Analytics cookies:** to measure platform usage and improve the experience (e.g., Google Analytics with IP anonymization).
- **Preference cookies:** to remember custom dashboard and tool configuration settings.

You can configure your browser to reject or delete non-essential cookies. However, this may affect platform functionality. For more information, see our Cookie Policy at zaipex.ai/cookies.

7. SECURITY MEASURES

ZAIPEX implements technical, administrative, and physical measures to protect your personal data against loss, theft, alteration, unauthorized access, or disclosure, including:

- Data encryption in transit (TLS 1.2+) and at rest (AES-256).
- Role-based access control (RBAC) with least-privilege principle.
- Multi-factor authentication (MFA) for access to systems with personal data.
- Continuous auditing and monitoring of access and activity on platforms.
- Non-disclosure agreements with all personnel and vendors who access personal data.
- Incident response procedure with notification to INAI and affected data subjects.

8. DATA RETENTION PERIODS

Personal data will be retained for the time necessary to fulfill the purposes described in this notice and applicable legal obligations:

- **Tax and billing data:** minimum 5 years as required by the Mexican Federal Tax Code.
- **Contractual data:** for the duration of the contract and up to 3 years thereafter for

statute of limitations purposes.

- **Prospecting data:** until the prospect requests cancellation or 2 years elapse without active contact.
- **Platform usage data:** for the duration of the service contract and up to 12 months thereafter for audit and support purposes.

9. CHANGES TO THIS PRIVACY NOTICE

ZAIPEX reserves the right to modify or update this Privacy Notice at any time in response to legislative, jurisprudential, business, service, or privacy practice changes.

Any modification will be communicated through:

- Email to the address registered by the data subject.
- Publication on our website: zaipex.ai/privacy
- In-platform notification within ZAIPEX dashboards and tools.

The current version will always be available at zaipex.ai/privacy. We recommend reviewing it periodically. Continued use of ZAIPEX services after notification implies acceptance of the changes.

10. RIGHT TO FILE A COMPLAINT WITH INAI

If you believe that your ARCO request was not properly handled or that ZAIPEX has violated your right to personal data protection, you may file a complaint with the National Institute for Transparency, Access to Information, and Personal Data Protection (INAI):

- **Website:** www.inai.org.mx
- **INFOMEX-INAI System:** for electronic submission of requests and appeals.
- **Phone:** 800 835 4324 (INAI)

VERSION AND EFFECTIVE DATE

Version

1.0 – March 2026

Last updated

March 2026

Available at

zaipex.ai/privacy