

Privacy Notice for Zuma's Complaints Channel

1. Identity and address of the responsible party.

Zuma Energía, S.A. de C.V., with registered address at Avenida Paseo de la Reforma 483, 53rd floor, Colonia Cuauhtémoc, zip code 06500, Mexico City (hereinafter, "Zuma"), committed to the protection of your personal data, assuming responsibility for its use, handling, and confidentiality in accordance with the provisions of the Federal Law on Protection of Personal Data Held by Private Parties "*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*" (hereinafter, the "LFPDPPP") and to inform you of the main characteristics of the processing to which your personal data will be subjected, issues this Privacy Notice.

2. Personal data subject to processing by Zuma.

To fulfill the purposes outlined in this Privacy Notice, Zuma will collect the personal data necessary for managing and handling complaints.

Zuma may process the personal data of third parties when you provide us with their information as part of the complaint filed, in order to fulfill the purposes of this Privacy Notice.

3. Sensitive data.

We inform you that, for this Privacy Notice, Zuma may collect sensitive personal data¹ related to the complaint filed.

4. Primary purposes.

Zuma will process the personal data described in this Privacy Notice to fulfill the primary purposes indicated below:

- Secure and confidential management and processing of communications relating to violations of Zuma's Code of Ethics and Business Conduct and/or applicable legislation;
- Investigation of actions or omissions that may constitute a criminal or administrative offense;
- Identifying and preventing possible illegal conduct that could constitute a violation of current legal provisions and/or Zuma's internal regulations, such as its policies, procedures, manuals, among others;
- Complying with the obligations established by applicable legislation; and
- Responding to legal requests from the competent authorities.

¹ **Sensitive Personal Data:** Personal data that affects the most intimate sphere of the data subject, or whose misuse could give rise to discrimination or entail a serious risk to the data subject. By way of example, but not limited to, personal data that may reveal aspects such as racial or ethnic origin, present or future health status, genetic information, religious, philosophical, and moral beliefs, political opinions, and sexual preference are considered sensitive.

5. Transfer of personal data.

Zuma may transfer your personal data in the following cases:

- To companies belonging to the Zuma corporate group, if required to fulfill the purposes outlined in this Privacy Notice.
- Competent authorities in cases provided for by law.
- And any other transfer permitted under the terms of the LFPDPPP.

6. Means and procedure for exercising ARCO rights and/or revoking consent for the processing of personal data.

You (the Owner), or your legal representative, may exercise any of the rights of access, rectification, cancellation, or opposition ("ARCO Rights"), as well as revoke your consent for the processing of your personal data, by sending an email to the following address: avisoprivacidad@zumaenergia.com

The process will be carried out in accordance with the following stages:

A. Receipt of the request.

Zuma will receive requests submitted by the owner of the personal data or their duly accredited legal representative.

The request must contain, at a minimum, the following information:

- Full name of the Owner and address or other means of receiving notifications;
- Valid official document proving the identity of the Owner, or, where applicable, the legal representative, together with the document proving their legal status;
- Clear and precise description of the personal data for which any of the ARCO Rights are to be exercised (except in the case of the right of access);
- Express indication of the ARCO right that you wish to exercise, or the specific request of the Owner; and
- Any other element or document that facilitates the location of the personal data.

B. Review and verification of the request.

Once the request has been received, Zuma will:

- Verify that the request contains all the required elements and that the identity of the requester is duly accredited.
- In case of omissions, it may request additional information, which must be provided within a maximum period of five (5) business days. If not received on time, the request may be considered not submitted.

C. Special considerations for cancellation requests.

In requests for the deletion of personal data, Zuma will assess whether there are legal grounds that exempt Zuma from fulfilling the deletion requirement. Zuma will not be obliged to delete personal data when:

1. It is necessary for the fulfillment and performance of a contract between the parties;
2. Its processing is provided for in a legal provision;
3. Its cancellation would hinder judicial or administrative proceedings relating to tax obligations, criminal investigations, or the imposition of administrative sanctions;
4. It is necessary to protect the legally protected interests of the Data Subject;
5. They are necessary for the fulfillment of a legal obligation acquired by the Data Subject;
6. They are required for the performance of a task carried out in the public interest; or
7. They are processed for the purposes of medical prevention, diagnosis, healthcare, or health service management by professionals subject to a duty of confidentiality.

If any of the above exceptions apply, Zuma will communicate the duly justified refusal to the Owner within the legal deadline.

D. Determination and response.

Zuma will issue a determination on the admissibility of the request within a maximum period of **twenty (20) calendar days** from receipt (or from receipt of additional information, if required).

- If the request is admissible, it will take effect within a maximum period of **fifteen (15) calendar days** following notification.
- If the request is inadmissible, in whole or in part, the Owner will be informed of the reason for the refusal, including, where appropriate, supporting documentation.

The response will be delivered using the same means by which the request was received, unless the Owner expressly indicates an alternative means.

E. Delivery of personal data (only for access requests).

In the case of requests for access, once the identity of the applicant has been verified, the personal data will be delivered by:

- Simple copies in physical format,

- Electronic files, or
- Any other means indicated in this Privacy Notice.

If the request is addressed to an entity other than Zuma, it will suffice to notify the Owner to consider the request fulfilled.

F. Extension of deadlines.

The aforementioned deadlines may be extended once for an equal period, when justified by the circumstances of the case. The Owner will be notified promptly of such an extension.

7. Options and means to limit the use or disclosure of personal data.

You may request the limitation of the use or disclosure of your personal data by sending an email to the following address: avisoprivacidad@zumaenergia.com

The requirements for proving your identity, as well as the procedure for responding to your request, will be governed by the same criteria set out in the previous section. If your request is successful, Zuma will register you on its own exclusion list.

8. Changes to Privacy Notice.

Zuma reserves the right, at its sole discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. In such a case, Zuma will maintain its Comprehensive Privacy Notice on the Zuma Reporting Channel. We recommend that you visit this site periodically to find out if any changes have been made.

Last updated on October 28th, 2025.