

COMPREHENSIVE PRIVACY NOTICE OF ASPEN INSTITUTE MEXICO

Pursuant to the provisions set forth in the Federal Law on Protection of Personal Data Held by Private Parties (the "Privacy Law"), [*Aspen Institute Mexico, A.C.*] and/or its affiliates, subsidiaries or related parties (jointly, the "Aspen Institute Mexico"), makes available for you this privacy notice (the "Privacy Notice") and, therefore, inform you that your personal data are protected and safeguarded from loss, damage, alteration, destruction, unauthorized use, wrongful access or disclosure, pursuant to the guidelines and principles of the Privacy Law.

Therefore, the Aspen Institute Mexico informs You the following:

(1) Data Controller: *Aspen Institute Mexico, A.C.*, domiciled at Periférico Sur 4225 oficina 406, col. Jardines en la Montaña, C.P. 14210, Delegación Tlalpan, Mexico, Distrito Federal, is the entity responsible for the use, protection and decision over the processing of your personal data. In compliance with the Privacy Law, the Aspen Institute Mexico has created and appointed an area in charge of processing and physically, administratively and technologically safeguarding your personal data, identified as:

Department of Personal Data Protection

Contact

Address: Boulevard Adolfo Ruiz Cortines (Periférico Sur) 4225 oficina 406, col. Jardines en la Montaña, C.P. 14210. Delegación Tlalpan, Mexico, Distrito Federal.

E-mail: info@aspeninstitutemexico.org

Telephone: (55) 5631 0592 and (55) 5631 1304

(2) Purposes of Personal Data Processing.

The personal data we collect from you shall be used, within and outside the country, in compliance with the principles of legality, quality, consent, notice, purpose, fidelity, proportionality and accountability, for the following main purposes, which necessary to carry out Aspen Institute Mexico's activities:

- a) To fulfill the Aspen Institute Mexico's corporate purpose;
- b) To carry out social development, scientific and cultural activities;
- c) To carry out welfare activities in benefit of low income persons, sectors and regions; as well as activities directed to achieve better subsistence and development conditions in the indigenous communities and vulnerable groups by age, sex or disability problems;
- d) To inform about forums, workshops, courses, seminars, programs, conferences and any other event carried out by the Aspen Institute Mexico, as well as to inform about the services rendered by the Aspen Institute Mexico.
- e) To sign you up for the forums, workshops, courses, seminars, programs, conferences and any other event carried out by the Aspen Institute Mexico;
- f) For the rendering of services by Aspen Institute Mexico;
- g) To link you to other organizations, according to the programs in which you participate in;

- h) For administrative purposes and to issue the corresponding certificates for the activities carried out and the services rendered by the Aspen Institute Mexico;

Additionally, we shall use your personal information for the following purposes, which may not necessarily be required to carry out the Aspen Institute Mexico own activities, but which allow and facilitate us to provide you a better service:

- a) To transfer your personal information, as applicable, pursuant to the corresponding section herein.
- b) To perform internal studies about the interests, profiles and behavior of the data owners in order for the Aspen Institute Mexico to be able to provide a better service, according to your needs and preferences.
- c) To perform researches, studies and statistical reports.
- d) With marketing, advertising or commercial research purposes.

In the event that you do not wish that your personal data are processed for any of these additional purposes, you shall expressly inform us of your refusal to process the personal data regarding these purposes that are not necessary, within a term of five working days, through e-mail or letter duly signed by you, addressed to the Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*'Data Controller'*).

Your refusal to use your personal data for the purposes hereof shall not imply by any reason whatsoever our refusal to provide you with the services and activities you requested.

In any event your Rights to exercise your right to revoke your consent or to object remain intact, if you do not state your refusal to the processing of your personal data for such additional purposes prior to the delivery of the same or their exploitation.

(3) Personal Data Collection. It shall be understood that you tacitly consent to the processing of your personal data if you do not object this privacy notice. In order to perform the purposes described herein we shall use the personal data directly, freely and voluntarily provided by you, either through the Aspen Institute Mexico website, in writing, according to the telephone, e-mail or by any other means, and which may include:

- a) Identification data: name; civil status; handwritten or electronic signature; Federal Taxpayer Identification Number (RFC in Spanish); Personal Identification Number (CURP in Spanish); military service card number; place and date of birth; nationality; photography; age, among others,
- b) Contact information: address; e-mail; telephone; cellphone.
- c) Employment data: position; work address; work e-mail; work telephone; employment references; time of employment, among others.
- d) Academic information: educational development; titles; professional license; certificates; acknowledgments, among others.
- e) Financial information: tax information; credit history; income and expenditures; bank accounts; insurances; sureties, credit card number, social security number, among others.

In the event we request any financial data you shall expressly state your consent for the processing of your financial data within a term of five working days, through e-mail or a letter duly signed, addressed to the Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*'Data Controller'*), unless the exceptions set forth in articles 10 and 37 of the Privacy Law apply.

In any event your Rights to exercise your right to revoke your consent or to object remain intact, if you do not expressly state your consent for processing your financial data prior to the delivery of the same or their exploitation.

(4) Sensitive Personal Data. In addition to the aforementioned personal data, for the purposes informed herein, we may use personal data considered as sensitive, which are mentioned as follows, hence in the event we request any of these sensitive personal data, you shall expressly state your consent for processing, within a term of five working days, through e-mail or a letter duly signed, addressed to the Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*'Data Controller'*):

- a) Ideological information.
- b) Information on political opinions.
- c) Union membership information.
- d) Health information.
- e) Sexual life information.
- f) Racial or ethnic origin information.

In any event your Rights to exercise your right to revoke your consent or to object remain intact, if you do not state your refusal to processing your personal sensitive data prior to the delivery of the same or their exploitation.

(5) Transfer. The Aspen Institute Mexico specific purpose is to enhance the relations of the organization on a national and international level (mainly, but not exclusively, with its international net in ten countries), to develop the link among leaders, as well as to promote democratic values and principles.

Therefore, the Aspen Institute Mexico may communicate your personal data to its national contacts net, Civil Society Organizations and public entities; to its Headquarters in Washington, DC; to the international net of the Aspen Institute Mexico in ten countries; as well as to affiliates, subsidiaries or related parties, to comply with the main purposes set forth in Section (2) herein (*'Purpose of Personal Data Processing'*).

It shall be understood that you tacitly consent your personal data to be transferred for the main purposes set forth in Section (2) herein (*'Purpose of Personal Data Processing'*), when you do not expressly communicate your refusal to such transfer, within a term of five working days, through e-mail or a letter duly signed, addressed to the Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*'Data Controller'*).

In the event of the additional purposes set forth in Section (2) herein (*'Purposes of Personal Data Processing'*), of financial data or of your personal data considered as sensitive, you

shall expressly state your consent for their transfer, within a term of five working days, through e-mail or a letter duly signed, addressed to the Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*Data Controller*), unless the exceptions set forth in article 37 of the Privacy Law apply.

In any event your Rights to exercise your right to revoke your consent or to object remain intact, if you do not expressly state your consent for your personal data to be transferred prior to the delivery of the same or their exploitation.

(6) Security and Control Measures for Personal Data Protection. Aspen Institute Mexico has adopted security measures of a technical, administrative and physical nature to protect your personal data and avoid their loss, damage, alteration, destruction, unauthorized use, unlawful access or disclosure and requires from third parties involved in Aspen Institute Mexico's activities to take these measures.

(7) Use of Cookies and Web Beacons. We inform you that our Web page may use tracking technologies as cookies, web beacons and other technologies, through which is possible to monitor your behavior as an Internet user, as well as to provide you with a better service and user experience when navigating in our Internet portal <http://aspeninstitutemexico.org/>

The Cookies comprise a data file stored in the hard drive or electronic communication device of a user when navigating in a specific web site, which allows information exchange between the site and the user's browser.

The cookies which may be used in the sites and pages of the Internet portal of Aspen Institute Mexico are only associated to the browser of a certain device, and do not provide the name or last name of the user. Cookies make possible that Aspen Institute Mexico acknowledges the registered users' browsers after they registered for the first time, without having to register in each visit to access the areas and services of the Internet portal of Aspen Institute Mexico. The user has the option to set up his/her browser to be informed in screen of cookies' reception and to block the installation in his/her hard drive. Please, consult the instructions and manuals of your browser to enhance this information. To use the web page of Aspen Institute Mexico, it is not necessary that the user allows the installation of cookies, in the understanding that in such event it will be necessary that the user registers each time he/she accesses the web page of Aspen Institute Mexico.

The Web beacons are visible or hidden images inserted within a web site used to monitor the user's behavior.

The personal data that may be collected through these tracking technologies are the following: means of session identification, authentication or user's preferences, duration of navigation, time of navigation in our Web page, sections consulted, and web pages accessed prior to our web page; as well as IP address of origin, navigator used and operating system. Such data shall be used to provide you with a better service and user's experience in the navigator of our Internet portal, as well as for statistical purposes. We inform you that we do not share these data with any third party.

These technologies may be disabled following the instructions set forth in the security or privacy sections of the help menu or set up of your web browser.

It shall be understood that you tacitly consent the processing of your personal data through tracking technologies such as cookies and web beacons when navigating through our Internet portal <http://aspeninstitutemexico.org/>

Our Department of Personal Data Protection, through the contact information set forth in Section (1) herein (*'Data Controller'*), shall answer any question you may have with regard to disabling the cookies and web beacons in your browser.

(8) Rights of Access, Rectification, Cancellation and Objection ("ARCO" in Spanish). You have the right to know at any time the details of your personal data processing, rectify them, cancel them, or otherwise, object to processing such data for specific purposes as data owner of the ARCO rights, pursuant to the provisions of the Privacy Law and according to the following:

- (i) **Right to Access your Personal Data.** You, prior authentication of your identity, shall be entitle at any time to access your personal data in possession of Aspen Institute Mexico through our Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*'Data Controller'*).

In this case, the Department of Personal Data Protection shall make available your personal data in possession of Aspen Institute Mexico, in an electronic format, by sending them to the e-mail account you have specified.

- (ii) **Right of Rectification of your Personal Data.** You are entitle to request the rectification of your personal data in possession of Aspen Institute Mexico if they are inaccurate, incorrect, imprecise, incomplete or if they are not updated, specifying which data shall be rectified and the correction to be made. This request shall be accompanied by the documents supporting such request.
- (iii) **Right of Cancellation of your Personal Data.** When you consider that your personal data are not necessary for any of the purposes set forth herein or, otherwise, they are being used for purposes you have not given your consent to, You have the right at any moment to cancel your personal data through the means set forth herein, which shall imply that Aspen Institute Mexico ceases to process your personal data, through blocking such data and the future dissociation thereof.
- (iv) **Right of Objection to the Preprocessing of your Personal Data.** You may, at any moment, object to the processing of your personal data or demand that the processing ceases if **(x)** there is legitimate reason and the specific situation requires so, and it must be justified, even if the process is lawful, the same must cease to avoid future losses, or **(y)** You object to the processing of your personal data for specific purposes.

The exercise of the right of objection shall not be justifiable in such cases in which processing is necessary to comply with an obligation of Aspen Institute Mexico.

- (v) **Exercise of the ARCO Rights.** You may exercise your ARCO rights through a letter duly signed or e-mail sent to our Department of Personal Data Protection to the address or electronic mail set forth in Section (1) herein (*Data Controller*), which shall include, at least, the following:
- a) Legal name, telephone, address and e-mail;
 - b) Documents evidencing your identity or legal representation, such as valid official credential, notarially certified power of attorney or proxy letter;
 - c) Precise description regarding the access, rectification, cancellation or objection of your personal data;
 - d) Granting or revoking express consent for the processing or transfer of your personal data, where applicable; and
 - e) Any other element clarifying your petition.

Revocation of Consent. You may revoke the consent, where applicable, you have granted for processing your personal data. Notwithstanding, it is important you keep in mind that we shall not be able to attend to your request or immediately conclude the use in all cases, because it might be possible that we are required to keep processing your personal data by any legal obligation. Furthermore, you have to consider that, for certain purposes, the revocation of your consent shall imply that we cannot keep providing you the service you requested, or the conclusion of our relation.

To Revoke your consent, you shall state such revocation in a letter duly signed or in an e-mail sent to our Department of Personal Data Protection, according to the contact information set forth in Section (1) herein (*Data Controller*), expressly requesting the revocation of your consent for the processing or transfer of your personal data, including the information set forth in paragraph (a) and (b) above.

Response to Requests. Our Department of Personal Data Protection shall answer any question you may have regarding the processing of your information; and shall respond to the request exercising the ARCO rights or requesting the Revocation, through an electronic mail, no later than 15 days as of reception of your request.

Within the following 15 days following the date You receive a response of Aspen Institute Mexico, or within in the term set forth by the Privacy Law in the event of not receiving a response, You shall be able to initiate the ARCO rights protection procedure before the Federal Institute for Access to Information and Data Protection (*IFAI* in Spanish).

(9) Limitation to the Use or Disclosure of Personal Data. In order for you to restrict the use and disclosure of your personal information, we offer the following means:

- a) Through your registry in our List of Exclusion for Sending Promotional Information ('LEIP' in Spanish), so your personal data are not processed for commercial, advertising or commercial research purposes by us. For further information you may communicate with our Department of Personal Data Protection according to the contact information set forth in Section (1) herein (*Data Controller*), or otherwise, consult our web page <http://aspeninstitutemexico.org/>
- b) Through your registry in the Public Registry to Avoid Advertisement of the Federal Consumer Protection Agency, so your personal data, in general, are not used to receive advertisement or promotions of goods and services companies. For further information about the registry you may consult the Internet portal <http://rpc.profeco.gob.mx/>

(10) Modifications. Aspen Institute Mexico may modify this Privacy Notice to update the same in the event of legislative, regulatory, internal policies amendments or new requirements to perform our activities or rendering or offering our services and, in general, for the use of the Internet portal of Aspen Institute Mexico and such modifications shall be notified through the Internet portal of Aspen Institute Mexico <http://aspeninstitutemexico.org/> and/or to the last e-mail address you provided.

Last update: September 4th, 2014.