

1. Purpose

Regulate the legitimacy of the processing and use of personal data at Grupo Bimbo, in order to promote privacy goals and avoid any data breach.

2. Scope

This policy applies to all Grupo Bimbo Entities and Organizations, in connection with the processing of personal data of their candidates, collaborators, suppliers, clients and consumers.

3. Definitions

Privacy notice: Physical, electronic or any other document, generated by the Global Legal and Regulatory Compliance Department or whoever it designates, made available to the Owner prior to the processing of his/her personal data, which establishes the information that will be processed and the purposes for which it will be used.

Consent: Manifestation of the will of the Owner, legal representative or guardian (or whoever exercises parental authority, in the case of a minor) in relation to the processing of personal data.

Personal data: Any information concerning an identified or identifiable natural and/or legal person.

Sensitive personal data: Data that affects the most intimate sphere of the data subject, or whose improper use may lead to discrimination or pose a serious risk to the data subject. Sensitive data includes, for example, data that may reveal aspects such as racial or ethnic origin, financial or property data, current and future health status, genetic and biometric information, religious, philosophical and moral beliefs, union membership, political opinions or sexual preference, and personal data of minors, based on applicable local legislation.

Rights of the owner: Those protections which may be granted by applicable laws or regulations related to the processing of the Owner's Personal Data. In particular and by way of example;


- **Access:** Data Subjects may access their Personal Data held by the Controller and request a copy of the Privacy Notice governing such data processing activity.
- **Rectification:** Data Subjects may rectify their Personal Data when it is inaccurate or incomplete.
- **Deletion:** The owner will have the ability to always require deletion of his/her personal data.
- **Opposition:** The owner may oppose the processing and sale of his/her personal data, in which prevents the Controller from using it.
- **Portability:** The owner will have the right to receive his/her personal data physically or electronically and being able to transmit it to a third party.

Pseudonymisation: Processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Owner: The natural and/or legal person to whom the personal data correspond.

Processing: Obtaining, using, disclosing or storing personal data, by any means. Use includes any action of access, handling, use, transfer, transformation or disposal of personal data.

Data breach: Breaches of personal data security occurring at any stage of processing that violate the confidentiality, integrity and availability of data, such as: (i) loss or unauthorized destruction; (ii) theft,

	<p align="center">Global Personal Data Protection Policy</p> <p align="center">Global Legal and Compliance Department</p>	<p align="center">FGB-CP-01</p>
---	--	--

misplacement or unauthorized copying; (iii) unauthorized use, access or processing; or (iv) unauthorized damage, alteration or modification.

4. Responsibilities

Global Legal and Compliance Director: Ensure compliance with this policy and applicable procedures. Establish and disseminate the procedures for receiving, processing, monitoring and responding to requests made by information owners, ensuring compliance directly or through designated persons in charge. Support and advise Grupo Bimbo Entities and Organizations to respond to requests from information owners to exercise the rights of the owner, as well as execute the determinations of the Ethics Committee.

Ethics and Regulatory Compliance Committee (“Ethics Committee”): Issue measures for the correct execution of this policy and approve, on a case-by-case basis, those situations that, according to this document, require express authorization from the Company.

Organization and Functional Directors: Implement this policy and comply with the provisions of internal procedures and other legal provisions on data protection in the countries where they operate, as well as designate a person responsible for serving as the link with the Global Legal and Regulatory Compliance Department.

5. General guidelines

The guidelines to which the Entities and Organizations of Grupo Bimbo are subject as those responsible for the files and databases of holders, are the following:

Legality

- They must collect and process the personal data of candidates, clients, consumers, suppliers and collaborators in a lawful manner, in accordance with the applicable regulatory provisions.
- The purpose of processing personal data must have a legal basis recognized in the applicable regulatory provisions.
- Obtaining data through deceptive or fraudulent means is prohibited.
- They must use all personal information provided to the Organizations and Entities of Grupo Bimbo, in accordance with the purposes accepted by the owner in the privacy notice and other applicable regulatory provisions.

Proportionality

- They will only collect personal information that is necessary for the functions performed and its processing must be justified.
- Personal data will not, at any time, be processed in a manner incompatible with the specific purposes previously authorized by the Data Subject.
- They must support and justify the purpose and treatment of the information collected in the privacy notice, which must be necessary and appropriate.
- Supplier contracts must include the confidentiality and protection of personal data clauses, approved by the Global Legal and Regulatory Compliance Department.

Information

- The privacy notice must include the essential characteristics of the processing to which personal data will be subjected.
- Owner must be notified when the purpose of the processing of their data changes or when the data is transferred outside of Grupo Bimbo to a third-party.

Publication date: Oct, 2017	Replaces: 4.16.C	Page: 2 of 5
-----------------------------	------------------	--------------

	<h2 style="text-align: center;">Global Personal Data Protection Policy</h2> <p style="text-align: center;">Global Legal and Compliance Department</p>	<p style="text-align: center;">FGB-CP-01</p>
---	---	---

- In the event of a data breach, the data subject must be notified as soon as possible about the data breached and about the steps to be taken by the data subject to mitigate the risks and protect themselves. The competent authorities must also be notified as soon as possible, if required by the applicable provisions.

Quality

- They are obliged to keep the personal information of candidates, clients, consumers, suppliers and collaborators of Grupo Bimbo up to date and correct.
- They will take all reasonable measures to ensure that personal data that are inaccurate with respect to the purposes for which they are processed are deleted or rectified without delay.
- Aggregated or pseudonymised information must be generated or obtained in a responsible and lawful manner. If there is information that can re-identify the Data Subject's data, it must be protected.
- They must limit the period of use of the information to the time strictly necessary. After this period, the data must be sequestered and used solely for the purpose of determining possible responsibilities in relation to its processing, until the legal or contractual limitation period for proceeding with its deletion expires.
- If the data is no longer required for the purpose for which it was collected, the information must be deleted from the Group's databases and systems, leaving a record of this procedure.

Responsibility

- It is mandatory to establish administrative, technical and physical security measures that allow personal data to be protected against security breaches.
- They must take the necessary and sufficient measures to ensure that the privacy notice is always respected.
- They will ensure the confidentiality of personal data provided to them by the owners or by third parties.
- In the case of a data transfer, they must verify that the third party complies with a minimum data protection standard similar to Grupo Bimbo.
- They must carry out an impact analysis prior to each use-case involving the processing of personal data, where Grupo Bimbo evaluates and identifies the risks that arise from the processing of the data, based on ***FGB-CP-01 Annex I. RoPA & PIA***.
- The Privacy Notice must be reviewed annually by each Organization and entity of Grupo Bimbo, in order to keep them updated with recent regulatory provisions.

Activities and procedures in which personal data are used

- When managing databases of candidates, clients, consumers, suppliers and collaborators, you must identify each of the activities and/or procedures in which personal data is processed.
- They must clearly differentiate databases containing personal information from those containing sensitive data.
- They must have a document that supports the identification of the databases they manage and the description of the personal and/or sensitive data they contain.

Flow of information

Once you have identified the activities or procedures in which personal data is safeguarded, you must have a document that supports the life cycle of these in each of your activities, clearly identifying:

1. When is Personal Data collected? At what stage?

Publication date: Oct, 2017	Replaces: 4.16.C	Page: 3 of 5
-----------------------------	------------------	--------------

2. How is the Personal Data obtained (personally or directly from the owner, or indirectly through publicly accessible sources or transfer.)?
3. Which departments and people within each Entity or Organization process personal data and for which of their functions?
4. Which internal activities and/or procedures is personal data processed?
5. Do these procedures require the transfer of data to third parties outside Grupo Bimbo?
6. How long is personal data retained?
7. Where (in which geographic region) was the personal data collected, and where will it be stored?
8. What are the mechanisms for updating and deleting it?
9. What measures are used for data protection and security?
10. What types of data are collected and what is the purpose of collecting it?

Consent

- It is mandatory to obtain the express consent of the data subjects for the processing of their personal data, through the handwritten signature of the data subject, electronic signature or any other authentication mechanism, when the purpose of using the information has changed, and when the information is to be transferred to third parties outside of Grupo Bimbo.
- The consent mechanism must be actionable and specific, that is, it must serve only to give consent to the processing of personal data.
- They must retain evidence of express consent for the corresponding use in physical or electronic media.
- They must provide suitable means for the owners of the information to revoke their consent or otherwise express their other rights regarding the processing of their personal data.

The general guidelines must be carried out based on ***FGB-CP-01 Annex I. RoPA & PIA.***

Informed consent


- It is mandatory to disseminate privacy notices, informing candidates, clients, consumers, suppliers and collaborators of the information collected from them and the specific purposes.
- This notice must be made available to the owners prior to the processing of their data.
- Consent to privacy notices may be express or implied, in accordance with the applicable legal provisions on data protection in the countries where they operate and this policy.
- In the event that the personal data belongs to minors, consent must be authorized by the holder of parental authority or guardianship over the minor.

No discrimination

The exercise of any of the rights of the owner, by the owners of the personal data, shall in no way result in a distinction or exclusion that is not objective, rational or proportional, and that has as its purpose or result, hindering, restricting, preventing or undermining the recognition, enjoyment or exercise of their human rights.

6. Responsibility / Ownership

The Global Legal and Compliance Department is the assigned owner of this policy and is primarily responsible for its content, updating and monitoring of compliance, as well as for submitting it for

	<p align="center">Global Personal Data Protection Policy</p> <p align="center">Global Legal and Compliance Department</p>	<p align="center">FGB-CP-01</p>
---	--	--

approval to the Global Internal Control and Risk Management Department, Steering Committee and General Management.

7. Updates

Changes made between versions are described.

Review / review history				
Version	Review date	Updated by:	Approved by:	Main changes
1	October, 2017	Global Director of Compliance	Global Director of Legal and Compliance	First publication
2	June, 2020	Global Director of Compliance	Global Director of Legal and Compliance	<ul style="list-style-type: none"> The name of the responsible Directorate has been changed to the Global Legal and Compliance Directorate The term security breach was added. In the definition of sensitive personal data, biometric, patrimonial and financial data were added. Addition of responsibilities of the Global Legal Compliance Directorate. The guideline on the processing of personal data of minors was added. Two data sources were added: candidates and consumers.
3	December 2021	Global Director of Compliance	Global Director of Legal and Compliance	<ul style="list-style-type: none"> The definition of owner, consent, personal data and objection has been expanded. Non-discrimination guideline was added.
4	October, 2022	Head of Compliance	Global Director of Legal and Compliance	<ul style="list-style-type: none"> Added <u>FGB-CP-01 Annex I. RoPA & PIA</u>
5	November 2024	Head of Compliance	Global Director of Legal and Compliance	<ul style="list-style-type: none"> Definitions are updated. The responsibility of the Legal and Compliance Director is updated. General guidelines are updated.