

## 1. **Purpose**

To regulate the legitimacy of the processing of personal information in Grupo Bimbo, in order to guarantee privacy and prevent any breach of security.

## 2. **Scope**

The scope of application of this policy is extended to all entities and Business Units of Grupo Bimbo, for the proper processing of the personal information of its applicants, associates, suppliers, customers and consumers.

## 3. **Definitions**

**ARCO Rights:** By their initials, they are the following:

- **Access** - The holders can access their personal data held by the person responsible and may know the privacy notice to which their treatment is subject.
- **Rectification** - The owners can rectify their personal information when it is inaccurate or incomplete.
- **Cancellation** - The owner will always be able to cancel his or her personal information.
- **Opposition** - The owner may oppose the processing and selling off his or her personal information, in which case the person responsible cannot make use of it.

**Breach of Security:** Security breaches of personal data that occurred in any phase of the treatment, such as: (i) unauthorized loss or destruction; (ii) theft, loss or unauthorized copying; (iii) unauthorized use, access or treatment, or (iv) damage, alteration or unauthorized modification.

**Consent:** Statement of the will of the data owner, legal representative or guardian (or whoever exercises parental authority, by means of which the treatment thereof is carried out.

**Databases:** An ordered set of personal information relating to an identified or identifiable person.

**Holder:** The natural or legal person to whom the personal information corresponds.

**Privacy Notice:** Physical, electronic or any other format generated by the Global Legal and Compliance Department that is made available to the holder, prior to the processing of their personal information.

**Personal information:** Any information concerning an identified or identifiable natural or legal person.

**Sensitive personal data:** That information that affects the holder's most intimate realm, or whose improper use may give rise to discrimination or entail serious risk to the holder. Specifically, any information that may reveal aspects such as racial or ethnic origin, assets or financial information, present and future health status, genetic and biometric information, religious, philosophical and moral beliefs, trade union affiliation, political opinions, or sexual preference is considered sensitive.

**Treatment:** Collection, use, disclosure, or storage of personal information by any means. The use covers any action of access, handling, use, transfer, alteration or availability of personal information.

**Transfer:** Any communication of data provided to persons other than the person in charge of the processing.

#### **4. Responsibilities**

**Global Legal and Compliance VP:** Ensure compliance and observation of this policy and applicable procedures. To establish procedures for the receipt, processing, follow-up, and timely attention of the requests made by the information holders. Communicate these procedures and supervise their compliance directly or indirectly, through whoever is designated. To support the Grupo Bimbo Entities and Business Units in responding to requests by the information holders to exercise their ARCO rights, which are defined herein, as well as to execute the decisions of the Ethics Committee.

**Ethics and Compliance Committee ("Ethics Committee"):** To dictate measures for the correct execution of this policy and to approve, on a case-by-case basis, those situations that, according to this policy, require express authorization from the Company.

**Business Unit and Functional Directors:** Implement this policy and comply with the provisions of internal procedures and other applicable legal provisions on data protection in the countries where they operate, as well as designate a responsible person to be the link with the Global Legal and Compliance Department.

#### **5. General guidelines**

The guidelines to which the Entities and Business Units of Grupo Bimbo are subject as responsible of the files and databases of holders are the following:

##### **Legality**

- They must collect and process the personal information of candidates, clients, consumers, suppliers and associates in a licit manner in accordance with the applicable regulations.
- It is prohibited to obtain this information through deceitful or fraudulent means.
- They must use all personal information provided to Grupo Bimbo Business Units and Entities, as agreed with the purpose accepted by the holder in the privacy notice and other applicable normative devices.

##### **Informed consent**

- It is mandatory to disseminate the privacy notices, informing the candidates, customers, consumers, suppliers and associates of the information that is collected from them and the purpose with which it is collected.
- Said notice must be made available to the holders, prior to managing their data, through the formats established by the Global Legal and Compliance Department.
- Consent to privacy notices may be express or implied, in accordance with the applicable legal provisions regarding data protection in the countries where we operate and the present policy.
- If the personal data belongs to minors, reasonable efforts will be made to verify, in such cases, that the consent was given or authorized by the parental authority or guardianship of the minor.

##### **Proportionality**

- They will only collect personal information that is necessary for the functions performed and the processing thereof must be justified.
- Personal data will not be treated, at any time, in a way that is incompatible with its specific purposes.
- They must support and justify the purpose and processing of the information collected, in the privacy notice, and said purpose must be necessary and adequate.
- They must stipulate in the contracts concluded with the suppliers, the clause of confidentiality and care of the personal information, approved by the Global Legal and Compliance Department.

## Information

- They must clearly disclose the essential characteristics of the processing to which the personal information provided by the holders will be submitted, through the privacy notice.

## Quality

- They have the obligation to keep up-to-date and correct the personal information of Grupo Bimbo's candidates, customers, consumers, suppliers and associates.
- They will adopt all reasonable measures so that inaccurate personal data is deleted or rectified, without delay, with respect to the purposes for which they are processed.
- They must limit the period of use of the information to the time strictly necessary. After this period, the data must be blocked for the sole purpose of determining possible responsibilities in relation to its processing, up to the legal or contractual prescription period to proceed with its cancellation.
- In case the information is no longer required for the purpose for which it was collected, they must delete said information from Grupo Bimbo's databases and systems, and record this procedure.
- The information regarding breach of contractual obligations must be eliminated within 72 (seventy-two) months from the failure to comply with all the Grupo Bimbo databases and systems, except in the case of contrary legal provision.

## Responsibility

- It is mandatory to establish administrative, technical and physical security measures to protect personal information against security breaches.
- They must take the necessary and sufficient measures to ensure that the privacy notice is respected at all times.
- They shall ensure the confidentiality of the personal information provided to them by the holders or third parties.

## Activities and procedures in which personal information is used

- When managing information databases, considering the five sources from which data is obtained: "candidates, customers, consumers suppliers and associates," they must identify each of the activities and/or procedures in which the processing of personal information is carried out.
- They should clearly differentiate databases containing personal information from those that also contain sensitive information.
- They must have a document that supports the identification of each of the databases they manage and the description of the personal and/or sensitive information they contain.

## Flow of information


Once they have identified the activities or procedures in which physical information is stored, they must have a document that supports the life cycle of said information in each of their activities, clearly identifying:

1. In which part of the activity the information is collected.
2. How the information is obtained (either personally or directly from the holder, or indirectly by sources of public access or transfer).
3. Which departments and persons within each Entity or Business Unit treat personal information and for which of its functions.
4. In which activities and/or internal procedures is the personal information processed.
5. If in these procedures the transfer of the information to third parties outside Grupo Bimbo is required and effected.
6. For how long the personal information is kept.
7. The mechanisms for the updating and elimination of said information.
8. What measures are used for the safeguarding and security of said information.

9. What types of data are collected and their purpose.

### Consent

- It is mandatory to obtain the express consent of the holders of the information for the processing of: sensitive data, financial and patrimonial data, when the purpose for using the information has changed, and when the information will be transferred to third parties outside Grupo Bimbo.
- In the express consent, they must obtain the signature of the holder, electronic signature, or any means authentication.
- They must keep, physically or electronically, the evidence that the holders gave their express consent for the corresponding use.
- They must provide the appropriate means for the holders to revoke their consent regarding the processing of their personal data.

The General Guidelines must be carried out based on  **FGB-CP-01 RoPA & PIA.xlsx**

### No discrimination


The exercise of any of the ARCO rights, by the holders of personal data, in no way and under no circumstances, should result in the distinction or exclusion that is not objective, rational or proportional, and whose purpose or result is to hinder, restrict, prevent or impair 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 contents, updating, monitoring of its compliance and submission for approval before the Global Internal Control and Risk Management Department, the Steering Committee, and CEO.

### 7. Updates

Revisions / Revision log				
Version	Revision date	Updated by:	Approved by:	Changes Main
1	October, 2017	Global Director Institutional Relations	VP Global Counsel	First publication
2	June, 2020	Global Director Institutional Relations	VP Global Counsel	<p>The name of the responsible Department was changed to Global Legal and Compliance Department. It was added:</p> <ul style="list-style-type: none"> <li>• "Breach of security" term.</li> <li>• Biometric, proprietary, and financial data in the definition of sensitive personal data.</li> <li>• Responsibilities for the Global Legal and Compliance Department.</li> <li>• The guideline on the processing of personal data of minors.</li> <li>• Two data sources: candidates and consumers.</li> </ul>

3	December, 2021	Global Director Institutional Relations	VP Global Counsel	The definition of owner, consent, personal data, and opposition was expanded. The nondiscrimination guideline was added.
4	October, 2022	Global Director Institutional Relations	VP Global Counsel	Addition of  <b><u>FGB-CP-01 RoPA &amp; PIA.xlsx</u></b>