

Legal	
Code: LG-01	Review No.: 2
Preparation Date: Jun 27, 2014	Modification Date: June 28, 2021

## Privacy Policy



### 1. Purpose and Scope

The main purpose of this policy is to comply with the scopes and application of the guidelines applicable to the activities conducted by Infraestructura Energética Nova, S.A.B. de C.V., and its various subsidiaries and Related Parties in Mexico, hereinafter referred to as “IEnova” or the “Company” provided by the Federal Individuals' Personal Data Protection Law (the “Law”) and its respective Regulations. Therefore, its content is of general observance by all the staff who work at IEnova, regardless of the types of contracts that govern their employment relationships with the Company.

This Policy sets out the minimum guidelines that pursuant to the Law must be applied for the preparation and review of the Privacy Notice (the “Privacy Notice”) applicable to IEnova, as well as to determine the appropriate use of the Personal Data (the “Personal Data.”) processed by IEnova either on a permanent or temporary basis.



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### 3. Policies

It is important to establish that the purpose of the Privacy Notice, in the terms of the Law is to protect the holders' Personal Data to ensure a legal, controlled and informed treatment so as to guarantee the holders' privacy and rights of informative self-determination.

The Privacy Notice must contain the following, including but not limited to:

- The identity and domicile of the Party Responsible for the Personal Data (IEnova).
- Information requested.
- Purpose (intended use of the information).
- Options and means to limit the use or disclosure of the Personal Data, as well as to revoke consent.
- Means to exercise the ARCO Rights.
- Authorization to transfer Personal Data.
- If there is Sensitive Personal Data, it must be specified as such.

If at any time the legal provisions applicable to the treatment of Personal Data change, IEnova's Legal Department shall be obliged to modify and update in the content of the Privacy Notice as soon as possible.

All IEnova's staff are responsible for consulting any doubts they may be about this Policy with a person responsible from the Legal Department and be fully aware of the GE-12 Information Confidentiality Policy.

#### 3.1 Privacy Notice

The Privacy Notice is the means through which IEnova informs the holders, prior to the treatment of their Personal Data, of the actions based on the principles of legality, consent, data, quality, purpose, loyalty, proportionality and responsibility that will be adopted in receiving and processing their Personal Data.

##### 3.1.1 Means permitted to obtain holders' consent

Through the Privacy Notice, IEnova will establish that the holder expressly consents to that all Personal Data, including Sensitive Personal Data, shall be processed in accordance with the applicable legal provisions.

In the event of opposition to the foregoing, the holder in question may declare it to IEnova by exercising the ARCO Rights, which shall be explained later. IEnova shall proceed to apply the respective Block through the Privacy Committee that will analyze the particular request and will inform the respective department of its decision.

##### 3.1.2 Means permitted to request and withhold Personal Data

It is of the utmost importance that IEnova's staff identify the legal means through which the Company shall be entitled to collect and hold private parties' Personal Data. The Legal Department shall prepare a training and communication plan in order to achieve this objective. It shall be necessary at all times that Personal Data is obtained via clear and transparent channels thereby avoiding it from being obtained through deceitful or fraudulent means.

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All withholding of Personal Data must be fully justified by the department that requires holders' data. The holders of the Personal Data must be informed of the purposes for which their data is collected through the Privacy Notice. If IEnova requires the creation of a data storage base, it will endeavor to ensure that the data contained therein is maintained correct, complete, relevant and updated. Information stored in electronic media shall meet all the security components stipulated in TI-01 Correct Use of the Company's Systems Policy.

If a Sensitive Personal Data matrix needs to be created, its creation must be based on legal and specific purposes in line with the explicit activities or objectives sought by IEnova or the work department in question.

### 3.1.3 Internet Privacy Notice

When visitors enter IEnova's website, they will grant their express consent to IEnova to process their Personal Data within the applicable Mexican legal framework.

### 3.1.4 Cookies

Cookies are text files that are stored on the hard disk and help to offer more personalized experience on a website. Their use allows a correct and efficient visit because they provide information to website owners. In the event that visitors do not wish to send cookies to our systems, they may "deactivate" it and control it from their browser by eliminating them from their browsing history -cache- at the end of the visit.

A cookie (also called informatic cookie) is a small piece of data sent from a website and stored on the user's browser in such a manner that the website can consult the user's previous activity.

By using the website, visitors expressly consent to cookies being stored on their devices for the purposes declared in this Policy.

## 3.2 ARCO Rights (Access, Rectification, Cancellation and Opposition)

ARCO rights are those that holders may exercise personally or through a legal representative. The exercise of any of said rights is not restrictive and the holder shall be entitled to exercise them without delay.

Said rights shall be exercised through a request that contains at least:

- The name of the holder and domicile or any other means to communicate the reply to the request.
- The documents that confirm the holder's identity or, if applicable of the legal representation.
- The clear and precise description of the personal data for which the exercise of any of the aforementioned rights is sought.
- Any other element or document that facilitates the location of personal data.

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### 3.2.1 Access

The holder must be able to access all its Personal Data held on file by IEnova. The holder must also be able to access the Company's Privacy Notice easily.

### 3.2.2 Rectification

The holder may rectify its Personal Data as many times as deemed necessary if it is inaccurate or incomplete.

### 3.2.3 Cancellation

The holder shall be entitled to cancel it at any time. If the holder wishes to exercise this right, IEnova must initiate a blocking procedure followed by the elimination of the Personal Data. IEnova may conserve the Personal Data provided that doing so is solely to confirm the responsibilities derived from its treatment. IEnova shall inform the holder once the Personal Data is canceled. If said Personal Data was transmitted to any third party, IEnova shall be responsible for informing said persons of the holder's request for cancellation.

IEnova shall not be obliged to cancel Personal Data in the following cases:

- If it refers to a private, corporate or administrative contract and is necessary for its development and performance;
- If it must be processed due to legal provision;
- If its cancellation obstructs legal or administrative proceedings related to fiscal obligations, the investigation and prosecution of crimes or the restatement of administrative sanctions;
- Is necessary to uphold the legally-protected interests of the holder;
- Is necessary to perform civil service formalities;
- Is necessary to perform an obligation legally acquired by the holder, and
- Is subject to treatment for the prevention or medical diagnosis or the management of health services, provided that that it is processed by a health professional duty-bound to maintain secrecy.

### 3.2.4 Opposition

The holder's authority to request IEnova to refrain from processing its Personal Data in specific situations.

In accordance with the legislation applicable in the matter, IEnova may decline to hand over the Personal Data requested, either totally or partially, and shall inform the reason for the decision through the same channel used to send the request. Its resolution must be accompanied by the evidence it deems pertinent when:

- The requester is not the holder of the personal data or the legal representative is not duly confirmed for said purpose.
- The holder's personal data cannot be found in IEnova's database.
- Third-party rights are affected.
- There is a legal impediment or a resolution of a jurisdictional authority that restricts access to the personal data or does not permit its rectification, cancellation or opposition.
- The rectification, cancelation or opposition has already taken place.

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### 3.3 Availability of the Privacy Notice

The Lawyer shall be responsible for providing the Privacy Notice to all the Company's Departments that collect Personal Data in accordance with the guidelines of this Policy.

### 3.4 Transfer of Personal Data

If IEnova intends to transfer Personal Data to domestic or foreign third parties other than the manager, it must provide said third parties with the privacy notice and the purposes for which the holder limited its treatment.

The data shall be processed in accordance with the terms set forth in the Privacy Notice, which shall contain a clause that indicates that whether or not the holder accepts the transfer of its data, the receiving third party shall assume the same obligations as those applicable to the responsible party that transferred it.

It is important to mention that domestic and international data transfers may only be made without the holder's consent in any of the following assumptions:

- When the transfer is provided for by a Law or Treaty to which Mexico is a signatory.
- When the transfer is necessary for prevention or a medical diagnosis, the provision of medical assistance, medical treatment or the management of health services.
- When the transfer is made to controlled companies, subsidiaries or affiliates under the common control of the responsible party or to a head office or any company in the same group as the responsible party that operates under the same internal processes and policies.
- When the transfer is necessary pursuant to a contract signed or to be signed in the interest of the holder by the responsible party and a third party.
- When the transfer is necessary or legally required to safeguard a public interest or for the procurement or administration of justice.
- When the transfer is required for the recognition, exercise or defense of a right in a legal process.
- When the transfer is required for the maintenance of or compliance with a legal relationship between the responsible party and the holder.

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### 4. Definitions and Terminology

Term	Definition
<b>Lawyer</b>	Any legal advisor who works in IEnova's Legal Department. The Legal Department shall process the specific requests made by the holders in accordance with the terms of the Privacy Notice.
<b>Privacy Notice</b>	The physical, electronic or other type of document provided by the holder of the Personal Data prior to its processing with the notice of which data IEnova hold and what its purposes are.
<b>Personal Data Bases</b>	The ordered set of Personal Data about an identified or identifiable person.
<b>Blocking</b>	The precautionary measures to be taken by IEnova to prevent Personal Data from being processed once the holder has exercised its ARCO Rights.
<b>Personal Data.</b>	The data about an identified or identifiable person.
<b>Sensitive Personal Data</b>	Personal Data that affects its holder most intimately or whose misuse may cause discrimination against or put its holder in grave risk. Data that may disclose aspects such as racial or ethnic origin, current or future state of health, general data, religious, philosophical or moral beliefs, union affiliation, political opinions or sexual preference is considered particularly sensitive.
<b>ARCO Rights</b>	The rights of access, rectification and correction of Personal Data and to oppose its processing.
<b>Policy Owner</b>	The individual responsible for creating, reviewing and ensuring that the content of the policy is updated, relevant and is in compliance with the applicable laws and regulations.
<b>Entrusted Party</b>	The individual or company that processes personal data on behalf of the Responsible Party either alone or in conjunction
<b>Law</b>	Federal Individuals' Personal Data Protection Law and its Regulations.
<b>Responsible Party</b>	The individual or company that decides on how personal data is to be treated.
<b>ICT</b>	Information and Communication Technology.
<b>Treatment</b>	The obtainment, use, disclosure or storage of Personal Data by any media. It must be mentioned that that 'use' covers any action of access, management, exploitation, transfer or disposal of Personal Data.
<b>Transfer</b>	All communication of data by any person other than the Responsible Party of the Manager of the treatment of the

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### 5. References and Forms

#### 5.1 Internal References

- GE-12 Information Confidentiality Policy.
- TI-01 Correct Use of the Company's Systems Policy.

#### 5.2 External References

- Federal Individuals' Personal Data Protection Law.

#### 5.3 Forms

Document Code and Name	Withholding Code
Privacy Notice	
LG-01-L01 Guidelines for Granting and Revoking Powers of Attorney	ADM-10-02



### 6. Responsible Parties

Responsibility	Department
Managing the content of the policy (Policy Owner)	Corporate Legal Director
Complying with the policy	All employees
Overseeing compliance	Legal Department
Applying sanctions	Talent and Culture Management



### 7. Authorization

Name	Position
Rene Buentello Carbonell	Executive Vice President of Compliance and General Attorney
Roberto Rubio Macías	Comptroller Vice-President
Ramiro Fernández	Sr. Compliance Manager

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### ? 8. Contacts (Doubts and/or Clarifications)

Questions related to the implementation of or compliance with this Policy must be discussed with your immediate supervisor. The contact designated as responsible is this Policy will be the

Compliance Manager or you can contact the Ethics Helpline on 800 062 2107. The Ethics Helpline is available 24 hours a day, 7 days a week. All calls received by the Ethics Helpline will be treated as confidential.

Contact	E-mail	Telephone Number
René Buentello	<a href="mailto:rbuentello@ienova.com.mx">rbuentello@ienova.com.mx</a>	(55) 91 38 01 00
Rodrigo Cortina	<a href="mailto:rcortina@ienova.com.mx">rcortina@ienova.com.mx</a>	(55) 91 38 01 00
Araceli Enríquez	<a href="mailto:aenriquez@ienova.com.mx">aenriquez@ienova.com.mx</a>	(614) 445 18 18 39

### ✂ 9. Change Control

Review	Date	Description	Section Affected	Observations
1	Jan 23, 2018	Annual Review	N/A	No changes
2	August 1, 2020	Policies review project	General	General review of form and basis of the policy Adjustments to the policy section due to clarification of issues.
3	June 28, 2021	Form adequations	4, 5.1, 5.3	