

PRIVACY POLICY

It is informed to all interested parties that SCALA HIGHER EDUCATION S.C., a company identified with NIF/RFC. SHE1110145H4 with address at Calzada de la Naranja N°159, Fraccionamiento Industrial Alce Blanco, C.P. 53370 Naucalpan, State of Mexico, 4th Floor, properly constituted (from now on "SCALA"). In accordance with the Federal Law of Personal Data Protection, as well as what is reflected in the current European regulatory framework according to the GDPR (General Data Protection Regulation) 2016/679 of April 27, (from now "The Legislation"), is the owner of the website www.scalalearning.com (from now the "Website").

The present Privacy Policy (from now, the "Privacy Policy") is intended to inform you how SCALA defines and uses your Information.

Your access and use of the Website implies your full acceptance of this Privacy Policy (available at www.scalalearning.com). Any changes will be informed and published in a timely manner on the website itself, property of SCALA.

I. DEFINITIONS

For all purposes, the following terms will be applicable to this Policy:

- **Consent of the person concerned:** Every expression of free, specific, informed and unequivocal consent by which the concerned person agrees, either by a declaration or by a clear affirmative action, to the processing of personal data concerning him/her.
- **Privacy notification:** Verbal or written communication generated by the responsible, addressed to the data owner for the processing of their personal data, through which he/she is informed about the existence of the information processing policies that will be applicable, the way to access them and the purposes of the processing that is intended to be given to the personal data.
- **Data file:** Any structured set of personal data, accessible according to specific standards, whether centralized, decentralized or distributed functionally or geographically.

- **Personal data:** Any information relating to an identified or identifiable natural person (the concerned person); an identifiable natural person is any person whose identity can be established, directly or indirectly, in particular by means of an identifier, such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
- **Public data:** Is the data that is not semi-private, private or sensitive. Public data includes, among others, data relating to the civil status of individuals, their profession or trade, and their status as merchants or public servers. By their essence, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed court rulings that are not subject to confidentiality.
- **Sensitive data:** Sensitive data are understood as the data that affect the privacy of the owner or whose inappropriate use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in syndicates, social organizations, human rights or which promote the interests of any political force or which guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.
- **Data Processor:** Natural or juridical person, public or private, which by itself, carries out the processing of personal data on behalf of the controller.
- **Treatment Manager:** Natural or juridical person, public authority, service or other organism that, by itself or with others, determines the purposes and means of the processing. Based on the law and criteria established by the State of Mexico or the European Union.
- **Owner:** Natural person who is the owner of the personal data being processed.

- **Transfer:** The transfer of data takes place when the controller and/or processor of personal data, located in Mexico, sends the information or personal data to a recipient, who is responsible for the processing and is located inside or outside the country.
- **Transmission:** Processing of personal data that involves the communication of such data within or outside the territory of the State of Mexico when the purpose of the processing is to be carried out by the processor on behalf of the controller.
- **Treatment:** Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated processes, such as collection, recording, organization, structuring, storage, adaptation or alteration, extraction, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

II. WHAT INFORMATION WE TREAT ON THE WEBSITE?

When you browse our website you may provide us with data in a variety of ways, including:

A. The data you provide to us when you use the data forms on the website or when you communicate with SCALA by means of media such as e-mail.

The data will be processed for the purpose specified in each form. In the instance that you send us a message, SCALA will treat it with the purpose of managing the communications that could be established, based on your request.

We may obtain your express consent for the purpose of sending you commercial communications through each data collection form, or through a request in an e-mail message.

In addition, once you have provided your consent, if you do not want to continue receiving commercial communications, you could

withdraw your authorization by sending an email to the following address: dpo@scalahed.com.

The same procedure must be followed to exercise any of your rights under current data protection legislation (access, rectification, deletion, limitation and portability).

B. Data collected automatically by the website during your browsing, to which you give your consent under the terms specified in this Privacy Policy.

Like most commercial websites, our website uses a technology called "cookies" (small pieces of data that your browser stores on your terminal's hard drive) and web server logs to collect information about how our website is used.

For more information on how we use cookies, please check our Cookie Policy, which is available at www.scalallearning.com.

III. IDENTIFICATION OF THE RESPONSIBLE FOR THE TREATMENT OF PERSONAL DATA

The Responsible for the Processing of Personal Data is **SCALA HIGHER EDUCATION S.C.**, a company identified with NIF/RFC. SHE1110145H4 and domiciled at Calzada de Tlalpan No. 2148, Offices 8 and 9, second floor, Col. Campestre Churubusco, Del. Coyoacan in Mexico City, C.P. 04200, duly incorporated.

IV. DATA TREATMENT

A. Data processed on SCALA's services

- Personal data provided in the forms for requesting information, such as name, surname, telephone number, country, organization or service of interest.
- We will treat the data contained in the documents you send us during the process of contracting or provision of product or service, within the contractual framework between the parties.

- We will treat, as is, the information you provide through the use of cookies if you consent to the agreement of cookies, according to SCALA's cookie policy (available at www.scalalearning.com).
- Concerning the information that you may provide us by telephone, we inform you that we have a call recording system to guarantee the management of the quality of the telephone service. Through the acceptance of this document, you agree to the use of the data provided in our data collection form for the issuance of commercial calls offering our services, as well as the recording of these for the purposes of quality and service claims indicated.

B. Purposes of data processing (all of them with the legitimacy contained in art. 6.1 of the GDPR):

- Contact you through the necessary means, including electronic means, in your contact details, provided by you, in order to provide you with information related to SCALA's corporate purpose. This information will include commercial information and general information about SCALA.
- Show you advertising and promotion about our products, services and activities object of SCALA, related to your preferences based on your browsing habits (targeted or advertising cookies).
- The recording of calls to facilitate the process of information required by you and to verify the level of quality of our services (during the whole process, from your first contact with us).
- We may also process your data, internally within SCALA, for control, quality and security purposes, for our own regulatory compliance and in compliance with our legal obligations. This includes the processing of your data for the performance of satisfaction surveys of the services or products provided.

- Satisfy the requirements established in the regulations applicable to private companies in Mexico. Whether they are fiscal, accounting, administrative or those that the commercial activity establishes. As well as in the European regulations on data protection, a framework to which SCALA is subject to further guarantee their rights.
- To develop market research with the basic data that you freely provide to us by participating in them. Likewise, to carry out studies for statistical, scientific or historical purposes.
- To comply with the obligations undertaken with the personal data owners in the development of the relationship that exists between the personal data owner and SCALA.
- The management of information with third part companies with which SCALA has a contractual relationship (duly regulated with the appropriate clauses of data protection) and that is necessary for the execution of the object of your request.
- To comply with the requirements made by the relevant authorities in all matters affecting SCALA, such as but not limited to: collection of taxes, fees and contributions at local and / or national level. As well as the competent authorities in data protection.

C. For how long will we keep your data?

- The contact information you provide us requesting information will be treated indefinitely, until you revoke your authorization for us to contact you for the purposes indicated in this Privacy Policy. Being deleted when they are no longer necessary or relevant for the purpose for which they were collected or recorded.
- Information obtained through cookies and similar devices will be treated for the time periods indicated in SCALA's Cookie Policy (available at www.scalallearning.com).

D. Obligation to provide the data and consequences of not providing them: the different information collection forms will indicate which data are mandatory to complete the different requests. Without the provision of these, it won't be possible to execute your request.

E. Recipients of the data:

- SCALA relies on the collaboration of service providers and information technology providers who process data on behalf of and for our company. In these cases, after performing a strict selection control of the supplier based on the guarantees of compliance with data protection regulations, we will sign the relevant data processing contract with these entities. These providers give appropriate safeguards and may only use your data for what is strictly necessary in connection with the purposes described above. These entities will have access to the data in their capacity as data processors, and will only process the information following specific instructions on behalf of SCALA. We inform that in such events SCALA will adopt all the necessary measures so that the persons who have access to the Personal Data comply with SCALA's Personal Data Processing and Protection Policy and with the applicable legislation.

F. Rights of data owners: Personal data owners have the rights of access, rectification, deletion, limitation, portability, opposition, as well as the right to file a complaint before the competent authority on data protection, which in legal rights they are entitled to.

G. Requests, petitions, complaints or claims: The data owners may submit any request, petition, complaint or claim at the following addresses:

- Physical Address: Calzada de Tlalpan No. 2148, Offices 8 and 9, second floor, Col. Campestre Churubusco, Del. Coyoacán in Mexico City, C.P. 04200.
- Email address: dpo@scalahed.com.

- Submit a simple copy of the official documents that prove the identity of the owner and, if applicable, the legal representation of the same.
- Include a clear and precise description of the personal data with respect to which they will exercise the rights conferred by the aforementioned Law.

H. Security measures: SCALA has adopted the necessary technical, human and administrative measures to provide security to all personal data collected, avoiding its adulteration, loss, consultation, use or unauthorized or fraudulent access. These measures have been adopted according to the requirements established in the applicable legislation and in SCALA's Personal Data Protection and Processing Policy.

I. Personal data treatment policies: SCALA is submitted to the legislation in force in the Federal State of Mexico, complying with all its requirements. Furthermore, the SCALA group in its integral part, while maintaining compliance with the local legislation of those countries in which it operates, adheres to the European legislative framework on data protection, to better ensure compliance and rights for its users, customers and suppliers.

V. MODIFICATIONS

SCALA reserves the right to make any kind of modification to this document at any time, always within the framework of the provisions of the applicable legislation. Any changes will be reported and published opportunely on SCALA's website www.scalallearning.com

VI. APPLICABLE LAW AND CONFLICT RESOLUTION

This Privacy Policy will be managed and interpreted according to the Federal Law of the State of Mexico and the European regulatory framework, collected in the GDPR 679/2016.

Any dispute, controversy or claim concerning the interpretation, application and/or enforcement of this Privacy Policy must be submitted in

the first instance to alternative dispute resolution mechanisms such as mediation, conciliation or amicable settlement. In the case that the parties fail to settle the dispute within a maximum period of one (1) month from the date of notification by either side to its counterpart of the existence of the dispute, the parties shall submit the resolution of such dispute to the ordinary law.

_____Confidential notification_____

The contents of this message and its attachments are exclusively dedicated to the recipient and may contain confidential information subject to professional secrets. If you receive this email in error, please inform the sender promptly and delete the message. You must not reveal, copy, forward or distribute it. The opinions contained in this message or its attachments belong exclusively to the author and do not necessarily represent the opinion of SCALA HIGHER EDUCATION S.C. The confidentiality of this message is not guaranteed, nor is the receipt of this message in its entirety.

As a compliance of the Federal Law of the State of Mexico and the European regulatory framework included in the EU regulation 2016/679 of the European Parliament and of the Council of April 27, 2016, SCALA HIGHER EDUCATION S.C. with RFC. SHE1110145H4, address at Calzada de la Naranja N°159, 4th floor, Fraccionamiento Industrial Alce Blanco, P.C 53370 Naucalpan, Estado de México, email DPO@SCALAHED.COM, as the responsible for the processing of your personal data, informs you that your data is processed to send you relevant news of the services we offer by mail or email and in order to provide you with the requested service.

The legitimacy of the processing is based on legitimate and contractual interest. The data will be kept for the duration of the business relationship, except in cases provided for by law, and will be kept blocked for the competent authority.

You may exercise your rights of access, rectification, deletion, portability, opposition and limitation by sending a written request to our Data Protection Officer at DPO@SCALAHED.COM, identifying yourself as required by your rights.

No data will be transferred to third parties, except for legal obligation and/or those cases contemplated in the current legislation under the contractual legitimacy of the parts. You have the right to file a complaint if you deem it appropriate, before the competent authority in data protection.

Let's take care of the environment. Please don't print this email if it is not necessary.