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1. Introduction

To América Móvil, S.A.B. de C.V. (individually and together with its Subsidiaries and affiliates, “América Móvil” or the “Company”), the Privacy of communications and the protection of Personal Data are critical to preserving the reputation for trustworthiness by which the Company has been characterized since its inception.

The evolution of technology generally and of telecommunications in particular, as well as the demands for increased Privacy for Data Subjects, have given rise to the enactment of more stringent regulations concerning the lawful Processing of Personal Data in order to protect the Privacy of natural persons and preserve the right of such persons to make their own decisions about such data. These regulations are applicable to all who come into possession of Personal Data, including our Company.

We believe that the adoption of a Personal Data Privacy and Protection Policy (this “Policy”) and the implementation of a formal Privacy Program thereunder, are critical to our efforts toward meeting the challenges undertaken with the implementation of our Integrity and Compliance Program. A robust Privacy Program will most certainly provide a competitive advantage to our Company.

Accordingly, this Policy constitutes a reaffirmation of América Móvil's commitment to raising its Personal Data protection standards, as it offers guidance for the incorporation of measures that guarantee a safe, confidential, lawful and responsible Processing of Personal Data, and provides a fair and transparent disclosure of the conditions for their use, in each case in accordance with the applicable laws and international best practices.

This Policy is a reflection of the demonstrable, proactive satisfaction of our Personal Data protection obligations and is critical to ensuring the respect of human rights in each of the jurisdictions in which we operate.

The violation of this Policy, our Code of Ethics, our internal policies and procedures or our legal obligations regarding Privacy and Personal Data protection may lead to the imposition of administrative and criminal penalties, including the termination of contractual arrangements or provision of Services, fines and even personal imprisonment.

At América Móvil, the commitment to Personal Data protection is everyone's.

2. Purpose

América Móvil's Privacy Program has been designed to provide the required structure and guidance for incorporating appropriate Privacy standards and practices into our daily operations as a means for fostering trust and providing transparency and protection to those who have entrusted us with their Personal Data.

The purpose of this Policy is to set forth the principles and guidelines that shall govern the use of Personal Data, as well as the physical, technical and administrative Security



measures that we must comply with in view of our legal obligations and our duty to preserve our Company's reputation as an entity that is fully committed to Privacy and to Personal Data protection.

In addition, this Policy contains guidelines relating to the Privacy of communications related to the provision of our Services.

3. Scope

This Policy is applicable to and mandatory for you and for each and every one of our Employees, both internal and external, Processors and Third Parties, who have access to Personal Data held by América Móvil in each of the countries in which we operate. Accordingly, it is essential for you to know, understand, promote and respect the principles, values and directives contained herein.

4. Definitions

Compliance Office: It is the area of América Móvil responsible for establishing an Integrity and Compliance Program that includes proper and efficient policies and systems of control, surveillance and audit, and which examines constantly and periodically the compliance of the integrity standards at all the organization. yocumplo@americamovil.com

Compliance Office at Subsidiary: it is the area of the Subsidiary being responsible for executing, surveilling compliance and releasing the Integrity and Compliance Program, according to the criteria, indications and evaluations of the Compliance Office of América Móvil.

Confidentiality: means the obligation of any person that handles Personal Data to refrain from disclosing any such data.

Controller: means the legal person that determines the purposes and means of the Processing of Personal Data. Each América Móvil Subsidiary is responsible for the Personal Data provided to it by a Data Subject.

Data Subject: means the natural person to whom certain Personal Data relate.

Employee(s): means any individual or individuals who are employed under an individual employment contract or collective bargaining agreement by América Móvil or any of its Subsidiaries, and/or who renders professional or other similar Services thereto to América Móvil or any of its Subsidiaries.

Integrity and Compliance Program: Program developed and supervised by the Compliance Office, including but not limited to: (i) the preparation of policies and other guidelines of the Company in order to comply with the currently valid law; (ii) the identification, prevention and mitigation of the operational and legal Risks in order to



guarantee a long-term reputational value of the Company and generate more certainty for its value chain; (iii) establishing proper and efficient systems of control, surveillance and audit, which constantly and periodically examine the compliance of the integrity standards in all the organization; and (iv) the operation management of the Whistleblowing and coordination of training on matters of compliance.

Personal Data: any information concerning an identified or identifiable individual.

Personal Data Protection: a natural person's or Data Subject's right to protection against the illicit use of its Personal Data, granting them the power to decide and control the use of their information.

Privacy: the adequate use or Processing of Personal Data for the purposes authorized by the Data Subject and in accordance with the applicable laws.

Privacy Notice: means a physical or electronic document generated by the Controller, that is made available to a Data Subject prior to the Processing of his Personal Data.

Privacy Program: set of policies, guidelines, awareness-building instruments, and training mechanisms implemented by América Móvil to demonstrate compliance with its Privacy and Personal Data protection obligations.

Privacy Team: América Móvil's Personal Data Protection Group, which is responsible for overseeing and making decisions with respect to the Company's Privacy strategy.

Processing: the collection, use, disclosure or storage of Personal Data by any means. Use includes any action of access, management, exploitation, transfer or disposal of Personal Data.

Processor(s): a natural or legal person that, alone or jointly with others, processes Personal Data on behalf of América Móvil or its Subsidiaries.

Risk: the probability of having a negative event, and the effect or impact of such event, whose existence poses a threat (Risk source) and vulnerability of the Company to its effects.

Security: implementation of adequate physical, technical and administrative measures with regard to Personal Data protection.

Sensitive Personal Data or Special Personal Data: Personal Data which, if unlawfully used, would likely lead to material damage to the Data Subject. Examples of sensitive or special Personal Data include data concerning health, political or religious affiliation, sexual orientation, union memberships and, in some instances, biometric data of an individual.

Services: those services rendered under a service provision contract between a Subsidiary or affiliate of América Móvil and a Data Subject; any service which involves the use of



applications, software, websites and terminal equipment functionalities, and/or any other service that Data Subjects voluntarily decide to acquire.

Subsidiary: Any entity that is under América Móvil's control.

Third Party(ies): Distributors, representatives, consultants, commercial partners, agents, intermediaries, customers, contractors, lobbyists, advisors or suppliers who are part of the value chain of América Móvil or those who represent the Company during an interaction with another Third Party, a Government or Public Officials. This includes the civil society organizations and the education, charity, cultural or sports institutions.

Transfer: Any data communication of Personal Data to a person other than the Controller or Processor.

Transmission: means any communication of Personal Data between the Controller and the Processor.

Whistleblowing: It is the internal platform of América Móvil through which the Employees or Third Parties may complain anonymously and confidentially about any breach to the Code of Ethics and/or to the Company policies <https://denuncias.americamovil.com/>

5. General Guidelines

5.1 Privacy Program.

In an effort to raise our Personal Data Protection standards, we have implemented a Privacy Program that lays the cornerstones of the set of actions we have taken to comply with our legal obligations and demonstrate on an ongoing and transparent basis that we have implemented the necessary controls to protect Personal Data at each Processing stage. The cornerstones of our Privacy Program are:

- **Responsible Management.** For América Móvil, the protection of Personal Data constitutes a daily endeavor, and it is embodied in a proactive responsibility by which we apply the appropriate physical, technical and organizational measures to ensure and demonstrate that Personal Data is processed in accordance with the applicable laws;
- **Commitment.** We guarantee that Personal Data is protected and used exclusively for the purposes authorized by the Data Subjects and the applicable regulatory requirements; and
- **Legality.** Each of us, at every organizational level within América Móvil, are obliged to comply with the Company's policies and processes and the applicable laws with regard to Personal Data Protection.

At América Móvil, Personal Data Protection is a crucial activity for ensuring the respect of human rights in each of the jurisdictions in which we operate. We are fully committed to the lawful Processing of Personal Data and to implementing the required measures to demonstrate its responsible management in accordance with the guidelines set forth herein.



A. Data Protection by Design and by Default

We endeavor to implement appropriate physical, technical and organizational measures, both at the time of determination of the means for Processing Personal Data and at the time of the Processing itself, taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of Processing, as well as the risks that certain Processing could imply for the rights and freedoms of Data Subjects.

Likewise, we will apply the appropriate technical and organizational measures for ensuring that, by default, only Personal Data which is necessary for each specific purposes of the Processing is processed.

5.2 Privacy Team

In order to disseminate, execute and oversee the observance of our Privacy Program and this Policy, we have created a Privacy Team comprised of experts with broad experience in legal matters and best practices in Personal Data Protection from each Subsidiary and/or region, to better understand the inner workings and Privacy needs of each principal unit. Our Privacy Team is dedicated to ensure that América Móvil's standards are adequate for complying with its legal obligations and aligned with its commercial objectives, achieving at all levels the maximum Personal Data Protection.

A. Composition of América Móvil's Privacy Team

Our Privacy Team is comprised of a Local Data Protection Officer (or “ Delegate” or any other title assigned thereto in accordance to applicable regulations) that is designated for this purpose and will be responsible for the Personal Data Protection for one or more of América Móvil's Subsidiaries, in a given country or region. Each Subsidiary and/or region shall appoint such expert as it deems necessary for the performance of its duties.

The Privacy Team is led by América Móvil's Data Protection Officer, who is a member of the Compliance Office of our Company.

B. Duties of América Móvil's Privacy Team

The duties of América Móvil's Privacy Team will be, without limitation, the following:

- Define and coordinate the implementation of actions, tools and mechanisms to foster a Personal Data Protection culture in América Móvil and to demonstrate compliance with its legal obligations with regard to Personal Data Protection.
- Issue the necessary mandatory observing ;
- Identify potential threats and coordinate the assessment of Privacy Risks.
- Design strategies for the prevention of Security breaches, regulatory infringements and for safeguarding the rights of Data Subjects.
- Perform audits and reviews to ensure the observance of our policies and the applicable regulations; and



- Coordinate training programs and communications strategy on issues regarding Privacy and Personal Data Protection.

C. Duties of Our Local Data Protection Officers

Without prejudice to the duties imposed by the applicable laws of their respective jurisdictions, our Local Data Protection Officers shall, at a minimum:

- Participate in a timely manner and to whichever extent may be necessary, in all matters pertaining to Personal Data Protection.
- Advise on Personal Data Protection and the implementation of related projects to all business units of their Subsidiary and/or region and coordinate such actions as may be necessary to ensure the observance of their Personal Data Protection policies and/or practices.
- Analyze, monitor and assess the logical flow of personal information to identify the types of Processing, life cycle and data bases which are subject to the applicable laws.
- Prepare, review and, where appropriate, update any Privacy Notices as required by the applicable laws.
- Process in a timely manner the requests submitted by Data Subjects in connection with the exercise of their rights over their Personal Data and establish procedures to address their complaints.
- Oversee the observance of the principles and duties established with regard to Personal Data Protection by the applicable laws, this Privacy and Personal Data Protection Policy and América Móvil's related policies and procedures.
- Review and update contracts with Third Parties regarding Transfers and Transmission of Personal Data.
- Process and manage the inquiries of competent authorities with regard to Personal Data.

D. Risk Assessment

One of the primary features of América Móvil's Privacy Program is its procedure for identifying the Company's legal obligations and existing processes about Personal Data Protection and for determining the degree of compliance therewith by each of the Company's Subsidiaries. Risk assessment is a tool for making an objective assessment of the relevant Risks and the potential measures available to mitigate them.

To do this, we take into account the applicable legal requirements, the international best practices and standards with regard to the Security of Personal Data and other relevant considerations.

Our Privacy Team is responsible for mapping out the data Processing operations of each of our Subsidiaries, identifying any threats and assessing the relevant Risks as a basis for the design of our data breach prevention and non-compliance avoidance strategies, as well as to ensure that the rights of the Data Subjects are protected.



We manage our Risks to minimize our levels of exposure by improving our control measures in order to reduce the likelihood and diminish the impact of their occurrence, as well as to mitigate our inherent Risks based on the aforementioned measures until any residual Risk has been reduced to a level that is deemed reasonable.

Consistent with the principles of proactive approach and ongoing improvement, our Risk map is updated once a year or more often where necessary in view of material issues that may impact its outcome.

E. Data Protection Impact Assessment

Where a type of Processing is likely to result in a high Risk to the rights and freedoms of Data Subjects by reason of its nature, scope, context and purpose, in particular, if it involves using new technologies, each Subsidiary or region shall, prior to the Processing, carry out an assessment of the impact on Personal Data Protection in accordance with the applicable directives and consistent with international best practices and the applicable laws in the jurisdictions in which we operate.

F. Data inventory

As our Personal Data Processing operations evolve and we engage in new types of Processing, we will maintain at all times a record of our own Processing activities and the Processing activities performed by our authorized third parties, in accordance with the applicable laws.

5.3 Legal Basis for the Processing of Personal Data

América Móvil processes Personal Data for the purpose of fulfilling its contractual obligations to the Data Subject concerned to the provision of Services. For our Processing activities to be lawful, Personal Data must be supported on a legitimate basis or due legal authorization.

Our actions to ensure that all Personal Data are processed in a fair and lawful manner will focus primarily on:

- Securing the consent of the Data Subject where such consent is required for the Processing of Personal Data relating to him or her, unless no such consent should be necessary in accordance with the applicable law.
- Processing Personal Data solely and exclusively for the specific purposes for which the Data Subject has authorized and we will not make any other use of them, except when expressly authorized.

5.4 Transparency

In accordance with the applicable law, prior to collecting Personal Data we must inform Data Subjects, in a fair and transparent manner, using clear and plain language, at least the following:



A. Identity of the Legal Person Responsible for Processing the Personal Data

We will provide information to the Data Subjects on the identity and address of the Company and/or the legal persons responsible for Processing the Personal Data entrusted to us.

B. Types of Personal Data Collected from the Data Subjects

América Móvil collects Personal Data in different ways through various channels, including directly in person from the Data Subjects and indirectly through its Subsidiaries and/or affiliates, Third Parties with whom it has entered into binding arrangements, as well as, legitimate public sources.

We may process various types of Personal Data belonging to different categories depending on the nature of the Services we will provide to and/or our relationship with each Data Subject, including, without limitation, Personal Data of identification or authentication, contact, asset and/or financial, fiscal, tax, demographic, information about the devices used for the provision of our Services and the geographic location of such devices, information about the Data Subject's interests and preferences as with respect to our Services and information derived as a result of the use of our Services.

We also collect Personal Data relating to our current and prospective Employees, including data of identification or authentication, contact, asset and/or financial, tax, demographic, academic information, employment data and information derived over the course of our contractual relationships with them.

In certain cases, we may collect biometric data relating to the physical and physiological characteristics of Data Subjects (e.g., fingerprints, facial features, iris and hand geometry), and/or information about their behavior and personality (e.g., signature, handwriting, voice and keystroke recognition) or information about the current and/or future health of our Employees and/or Third Parties for purposes of the fulfillment of certain employment, health and/or public health obligations.

a. Personal Data Relating to Third Parties

In certain cases, we may process identification and contact data of a third parties to be contacted as personal references associated with the service owner for purposes related to the fulfillment of our obligations with respect to the Services contacted and/or the offering of Services. We may also process Personal Data relating to third parties which are provided by our Employees for emergency contact purposes or to manage certain employment benefits.

b. Children and Teenagers

América Móvil prohibits the collection of Personal Data of children and teenagers directly from them and will erase any such data immediately upon becoming aware of its existence.



We may only collect Personal Data with regard to children and teenagers with the consent of the parent, guardian or other holder of parental responsibility under the applicable law.

c. Information Relating to the Devices

We may collect information relating to the devices being used in connection with our Services, in particular through our proprietary software, programs and applications, either directly and/or infer from the use of certain Services, including information relating to the technical, configuration and operation characteristics of such devices, information relating to other connected or used devices (e.g., IP addresses, device identification data, preferences and information generated as a result of the interactions between such devices and other devices and applications), web browsing history information, online Services usage and consumption information and Third-Party software, applications and Services usage and consumption information.

d. Use of Cookies and Tracking and Other Technologies

Our websites and applications may use cookies, web beacons and other tracking technologies that allow us to monitor the behaviors of those who use our Services, offer them new products and Services based on their interests and preferences, provide them with enhanced Services and/or improve their experience in navigating our websites. We may use both proprietary and third-party cookies, as described on the specific cookie policy for each website. The cookies policy for each of our websites contains information about the cookies we use, their purposes and the procedure for disabling them where not necessary for the operation of the relevant website.

e. Use of Algorithms, Artificial Intelligence and Big Data

In certain events, we may use artificial intelligence-based algorithms to analyze consumer preferences and consumption trends with regard to products and Services generally, forecast consumer behaviors and consumption trends with regard to our Services, develop profiles and analyze data for technical purposes and to improve our products and Services. To the extent that we use any of these technologies, we will endeavor to ensure that such technologies are fair and are based on ethical values which foster respect for the dignity and freedoms of all people and that their adoption does not give rise to any form of discrimination or has a direct impact on the rights of individuals.

Where required by the applicable laws, we will disclose the issues that were taken into consideration in connection with the adoption of certain artificial intelligence-based algorithms.

f. Anonymized Information

To the extent practicable, where identifying the Data Subjects is not necessary we will use information protection techniques such as Personal Data anonymization to mitigate the risk of unlawful Personal Data Processing. When we apply certain anonymization techniques, in the absence of a possibility of individual identification, the data protection laws will not apply.



C. Permitted Uses of Personal Data

We may collect Personal Data for various purposes depending on the type of data, the Services we provide and the context within which we collected such data. America Móvil will inform about the primary and secondary purposes for which Personal Data will be handled, which may include the following:

- The execution of a service agreement and the performance of our obligations thereunder.
- The personalization and improvement of the Services provided to the customer.
- The identification and promotion of Services which may be of interest to our customers.
- Marketing and commercial prospecting activities.
- Processing operations without any evaluative human intervention and the performance of profiling activities.
- Compliance with the obligations under the laws, regulations, court orders and public safety and other official requirements in effect in each of the countries in which we operate. and
- Personnel recruitment and management.

D. Transfers of Personal Data

Any Transfer and/or Transmission of Personal Data shall be carried out in accordance with a legally binding instrument that sets forth the parties' obligations with respect to the protection of such data under the laws of the relevant country.

We may transfer Personal Data relating to the Data Subjects to fulfill our service obligations in the following events:

- To competent authorities where required by law or upon a duly substantiated written order of a court of competent jurisdiction.
- To Subsidiaries or affiliates that are subject to the same Privacy standards as América Móvil.
- To our business partners.
- To Third Parties involved in the provision of the Services we offer or which we are asked to provide.

We may transfer Personal Data relating to our Employees in the following events:

- To competent authorities where required by law.
- To banking institutions for payroll-related purposes, to insurance companies for insurance and reimbursement procedures, to pension fund managers and to third parties involved in the management of benefits and incentives to our Employees; and
- To recruiters and other legal persons for employment references, in which their consent will be necessary.



However, in certain specific events we may be required to transfer Personal Data and information to other Third parties, so, prior to sharing the Personal Data, we will inform in a concrete way, about the recipients or types of recipients and the purposes for which the information will be transferred.

We will only share Personal Data to third countries and/or third parties in territories that ensure an adequate level of Personal Data Protection as well as safeguards for the fundamental rights and freedoms of the Data Subjects.

E. Retention of Personal Data

We will only retain Personal Data for so long as they remain necessary in relation to the purposes for which they were collected or processed pursuant to this Policy and/or the relevant Privacy Notice, for purposes of providing the requested Services and for fulfilling our legal or contractual obligations, as the case may be.

However, under certain circumstances the further retention of Personal Data would be lawful and justified if such data remains necessary in relation to the purposes of each operation.

We will proceed to the safe and definitive deletion of Personal Data once the applicable retention periods have expired. Although we are not required to do so in every jurisdiction, we will endeavor to inform Data Subjects about the applicable Personal Data retention periods for each Processing activity.

5.5 Rights of the Data Subject

Under the laws of each of the countries in which we operate, the Data Subject has the right to access to its Personal Data, free of charge and in a simple manner, in physical form or in a structured, machine-readable electronic format, including obtaining a copy of such data and to be informed of the characteristics of any data Processing activities (right of access and data portability); to modify or update its Personal Data in case it is inaccurate or outdated (modification or rectification); to request its Personal Data to be deleted where once the purposes for which they were processed have been fulfilled (cancellation or suppression); to object to the use of its Personal Data for certain specified purposes, provided that such data is not necessary for the performance of our contractual obligations and/or the provision of Services (objection); and to request the establishment of safeguards to prevent their alteration, erasure or suppression (restriction of Processing).

América Móvil is committed to act without delay on the requests of Data Subjects for exercising their rights and on the claims or complaints of Data Subjects which are within its purview. Each of our Subsidiaries will establish in clear terms the means, procedures, deadlines and formats for the latter, in accordance with the laws of its home country. This information will be provided to the Data Subjects free of charge and, to the extent technically practicable, in a readable and easily intelligible format.

5.6 Security and Confidentiality of Personal Data Processing



América Móvil has adopted high Security standards to ensure the ongoing integrity, availability and Confidentiality of information in accordance with the requirements set forth in the applicable laws and with international best practices.

To protect the information entrusted to us, we have implemented physical, technical and administrative measures to ensure a level of Security appropriate to safeguard Personal Data at any stage of its Processing, against any event that may result in its loss or unauthorized access, use, disclosure or Processing of such data.

Access to the Personal Data of our customers and Employees is restricted to those Employees who have a need to know the information to perform their duties.

We monitor on an ongoing basis the adequate operation of our systems, applications and technological infrastructure to ensure that Privacy and Personal Data are protected appropriately. Notwithstanding the above, the Security and/or Confidentiality of Personal Data may become compromised by the occurrence of certain incidents. In such event, we will take action in accordance with our Information Security Policy and with such other policies and/or procedures as each operation may deem advisable. In addition, if we determine that a Security incident may have compromised the fundamental rights and/or freedoms of the Data Subjects we will, where required by law, notify the Security incident to the Data Subjects concerned and/or to the competent supervisory authority in order to prevent any further impact on their rights.

You and all other Employees of América Móvil must understand and comply with the measures adopted by the Company regarding the Security and Confidentiality of the Personal Data in its possession. The infringement of such Security measures could place our Company and/or the Data Subjects at risk and could give rise to disciplinary actions by the Company or to the imposition of penalties by the competent authorities.

A. Pseudonymization and Minimization

In any Processing of Personal Data, we will endeavor to process and limit the collection of Personal Data to the minimum necessary in relation to the purposes for which they are sought. Accordingly, we will make efforts to avoid Processing Personal Data that is excessive and/or is not relevant to the purposes for which they are processed. In particular, we will make every effort to limit the Processing and processing periods of Sensitive Data or special categories of Personal Data.

Where possible, we will use pseudonymization techniques to mitigate the inherent Risks relating to certain Personal Data Processing.

5.7 Data Protection Training

As part of our Privacy Program, we will institute a comprehensive training program to build awareness of our Personal Data Protection obligations among all our Employees. The program will include (i) an introductory online course, (ii) a set of Privacy tools comprised of



internal policies, directives, comparisons and other information accessible through our intranet Privacy webpage, and (iii) formative training and refresher courses.

In addition, we have adopted a Communication Strategy to foster ongoing awareness of Personal Data Protection issues. Our Privacy Team will be responsible for identifying the need for changes concerning our training program and for ensuring that our Employees' knowledge is kept up to date.

5.8 Ongoing Oversight

An integral component of our Privacy Program is the ongoing oversight of our Subsidiaries to control, manage and inform of the Risks relating to our Privacy management practices.

Our Privacy Team will enforce and oversee the satisfaction of our Privacy requirements to ensure that Personal Data is processed in a manner that is adequate and consistent with the principles and duties set forth in this Policy.

In order to ensure our Subsidiaries' compliance with our Privacy Program, our Data Protection Officer will establish periodic reporting procedures for all Subsidiaries, which will enable him or her to monitor all Privacy and Personal Data Protection issues on an ongoing basis.

Our Privacy Team will perform Privacy audits to determine the degree to which our Subsidiaries' systems, operations, processes and individuals are in compliance with our Privacy policies and practices.

5.9 Privacy of Communications

The Privacy of our customers' communications is one of our core principles, not only as a matter of an obligation of law but also because the public has placed its confidence in us.

América Móvil's guiding principles with respect to the Privacy of communications are as follows:

- No one may listen to or monitor any conversation, data transmission or other form of communication nor disclose its existence or content, except upon a duly substantiated and legally justified written order of a competent authority in terms of law. However, America Móvil is not able to give notice of such order to the subscriber.
- Notwithstanding the foregoing, it will be possible to provide information about individuals, geolocate, block, restrict a mobile line or keep track and control of communications where required by law, provided that the relevant request is made in writing in the form of a duly substantiated, legally justified official communication issued and executed by a competent authority.

5.10 Requests of Competent Authorities

Those of our operating Subsidiaries which are engaged in the provision of telecommunications Services are required, as holders of telecommunications concessions



or licenses, to cooperate with the competent authorities in matters pertaining to national Security and law enforcement, including by locating and providing the location of lines in real time, preserving, recording and providing certain types of data concerning the users of their Services and making such data available to such authorities for investigation, law enforcement, crime prevention or legal compliance purposes upon prior written request in the form of a duly substantiated and legally justified official communication issued and executed by the relevant authority, whether in physical form or electronic format, or upon court order, in each case in accordance with the laws of the relevant country.

In addition, in some cases we may be required by law or by order of a competent authority to block, discontinue or remove certain types of online content. In any such case, we will thoroughly review and analyze the relevant request in order to comply with the law and ensure that human rights are respected.

It should be noted that not all the jurisdictions in which we operate offer harmonized protections against the government's access to Personal Data and that in certain events we will be required by law to cooperate with the government in matters pertaining to Security and law enforcement without prior notice to the Data Subjects. In any such case, we will thoroughly review and analyze the relevant request to comply with the law and protect, to the extent legally and materially possible, the Privacy of Data Subjects who use our Services.

We are committed to the protection of human rights and freedom of expression. For this reason, the delivery of information to competent authorities is only allowed where required by law and in any event in accordance with the requirements set forth in the applicable laws of each of the countries in which we operate.

To fulfill these requirements, América Móvil has established a stringent set of Security protocols and criteria for ascertaining the validity of every request from an authority.

5.11 Privacy Policy Changes

All changes to a local Privacy policy, as well as the date on which such change(s) will come into effect, must be disclosed to the Data Subjects by means of an update notice posted in our relevant website(s).

6. Prevention

To avoid incurring in any violation of the laws relating to Personal Data Protection, we, as a Company, and you, as our Employee or as a Third party, shall endeavor to:

- Abide by our Code of Ethics, this Policy, our Information Security Policy, all other relevant policies of the Company and the laws relating to Personal Data Protection in effect in each of the countries in which we operate.



- Abide by the principles and provisions set forth in this Policy with regard to the lawful, responsible and transparent Processing of Personal Data concerning the Data Subjects.
- Prior to collecting any Personal Data, Data Subjects must be notified of the conditions under which such data will be processed through the relevant Privacy Policy/Privacy Notice. The Privacy policies and/or Privacy Notices of the Subsidiaries responsible for Processing Personal Data, in countries that have adopted specific regulations with regard to Privacy, are available for consultation on their respective websites. Such documents contain detailed information about the conditions under which the Personal Data will be processed, as well as the procedures for the Data Subjects to exercise their rights, in accordance with the regulatory requirements in effect.
- Obtain the Data Subject's consent to the Processing of Personal Data, where such consent is required as a matter of law.
- Refrain from collecting Personal Data through deceitful or fraudulent means, in order to protect at all times, the Data Subjects' interests.
- Access only such information that is strictly necessary to perform our job duties and refrain from collecting or Processing Personal Data which is not necessary for the purposes informed to Data Subject.
- Collect and store all Personal Data in accordance with the internal procedures of the relevant operation, preserve the integrity of such data, update such data as necessary and permanently erase such data in a secure manner when no longer necessary for the purposes for which it was processed.
- Know, embrace and comply with our physical, technical and organizational measures for ensuring the Security of Personal Data and their protection against damage, loss, alteration, destruction or unauthorized use, access or Processing, and procure for the ongoing improvement of such measures.
- Guarantee to the exercise of the Data Subjects' rights with respect to the protection of their Personal Data. In case of receiving a request of this nature, the Local Privacy Officer must be notified immediately. Other Employees, Processors or Third Parties must refrain from acting on any such request;
- Abide by the Confidentiality duty with respect to the Personal Data in your custody, including the following:
 - Have agreements and or Confidentiality clauses with any Employee, suppliers, subcontractors and/or Third parties which has access to such information so that is properly protected.
 - Ensure that our Employees understand, acknowledge and accept their obligations with regard to the information to which they have access and that they use such information solely and exclusively for the authorized purposes for which it was provided.
 - Implement corrective mechanisms for addressing the violation of our Employees' Confidentiality obligations.
- Ensure that all Third Parties responsible for Processing Personal Data abide by their Confidentiality and Security duties.



- Give immediate notice to the Company of any event and/or threat that may compromise the Security of its information and/or the Personal Data of Data Subjects.
- Implement adequate measures and mechanisms for demonstrating compliance with the Personal Data Protection obligations to which we are subject in accordance with the applicable laws.
- Implement internal controls and, where necessary, report through our whistleblower portal and/or to the competent authorities, any violation by any Employee or Third Party of our Code of Ethics, this Policy, our Information Security Policy or the applicable law.
- Promote our Personal Data Protection practices throughout our value chain, provide our staff with training with respect to our prevention measures and implement awareness raising campaigns.
- Establish any such measures and procedures, as may be necessary, to ensure that no one can listen to or monitor any conversation, data transmission or other form of communication, or disclose its existence or content, except upon they are authorized personnel or we must comply with a duly substantiated and legally justified order of a competent authority.

In addition, América Móvil's Employees and all Third Parties acting in its name or on its behalf are prohibited from engaging in the following conducts:

- Disclosing Personal Data of the Data Subjects to unauthorized Third Parties, except in connection with transfers of Personal Data which are required by law and/or which have been authorized by the legal department of the relevant Subsidiary.
- Transferring Personal Data to third parties which do not provide an appropriate level of Personal Data Protection standards. Prior to any transfer of Personal Data to a Third Party service provider, it must be evaluated that such third party provides adequate conditions and safeguards for the protection of such data.
- Transferring Personal Data to third countries or territories where the applicable laws do not provide an appropriate level of protection of such data.
- Using the Personal Data stored by América Móvil for purposes other than to perform their duties.
- Accessing Personal Data without being directed to do so or where such access is unwarranted.

7. Supervision and Verification of the Policy Compliance

The Compliance Office, the Compliance Office of the Subsidiary and Internal Audit are those responsible for supervising, surveilling and in its case, audit the due compliance of the provisions indicated in this Policy and its efficacy should be evaluated periodically.

The Compliance Office and the Privacy Team are responsible for evaluating periodically its Privacy Program which includes, among others, a series of measures that are aimed to prevent the infringement of the applicable laws regarding the Personal Data Protection. Likewise, they are responsible for giving orientation to the Employees regarding this Policy, through the email address privacidad@americamovil.com along with the immediate bosses.



In case it is necessary to carry out audits, they shall be done periodically and randomly at the different areas of the Company.

All the Employees of the Company should be committed with supporting and collaborating with the work teams in charge of performing such audits without hindering or obstructing the audit processes and without providing false or incorrect information.

Remember that it is everyone's obligation to comply and make comply the present Policy and report any act that is against it, through the Whistleblowing <https://denuncias.americamovil.com/>

8. Training and Release

For us, it is very important to understand and put into practice what is described in this Policy, and in order to encourage a culture of transparency, ethics and of values, América Móvil offers to its Employees and Third Parties, online or in-person courses, which shall be advertised through the official means of communication of the Company so as to train them to make it possible to understand the concepts, scopes, situations, as well as to express concerns that may take place on the day-to-day activities.

It is responsibility of all those who work at América Móvil or at its Subsidiaries, to attend the assigned sessions, comply with the times, and with the requested evaluations.

It is your commitment as Employee of América Móvil, to release the terms and principles of the present Policy and invite the Third Parties with whom business relations are kept, to comply with them.

9. Cooperation and Coordination

The Compliance Office is responsible for generating and homologating, as far as possible, the Privacy and Personal Data Protection Policy for the Company. However, the Subsidiaries are the ones responsible for complying with the legal obligations applicable before the Authorities of each country.

Due to the above, the Subsidiaries should have an internal procedure of standard compliance considering the specific obligations of each country on matters of anticorruption and anti-bribery.

Furthermore, the Subsidiaries should ensure that they have efficient mechanisms that allows them to cooperate and, when it corresponds, create between them some coordination at internal level in the development and implementation of policies and activities with regard to Privacy and Personal Data Protection.



10. Penalties

The penalties due to default to this Policy, both for the Employees and for the Third Parties, may be of administrative, labor, or even criminal kind, depending on the seriousness of the act, and they shall be sanctioned according to the internal work regulation and/or according to the applicable law.

Within América Móvil, the Ethics Committee of each Subsidiary shall be the last instance in determining the penalty in case of default of this Policy, no matter that such default may be penalized in addition by the applicable law, and the competent authorities.

11. Whistleblower Portal

In order to file a complaint on any default to this Policy or to our Code of Ethics, we have for you the Whistleblowing available at <https://denuncias.americamovil.com/>

You, just like each of the Employees of América Móvil and those of the Third Parties, are entitled and are obliged to report directly to our hierarchical boss, to the Compliance Office, to the Compliance Office of the Subsidiary or through the Whistleblowing, any behavior that breaches this Policy, to our Code of Ethics or any law, regulation, policy or internal procedure applicable and in general any unethical behavior.

Likewise, it is our duty to cooperate with any internal or external investigation and keep its confidentiality. The Employees who file any false or intentional complaint may receive disciplinary sanctions.

Remember that not reporting a serious ethical fault may have disciplinary consequences for you, because you may be covering an unethical act or a crime. It shall be possible to file anonymous complaints if the plaintiff wants so, however, it is recommended to leave some contact for following-up on the investigation.

It is important to know that América Móvil has adopted all the reasonable and justified measures to protect the confidentiality of the complaint and of the plaintiff, and furthermore, it is guaranteed at every moment that no kind of retaliation shall be taken against you for having filed the complaint.

Likewise, it is important to make clear that no provision of this Policy shall be understood so that people may directly file complaints before the competent authorities. In such cases, it is recommended to notify our Legal Direction and/or Compliance Office so that, if necessary, they act with the corresponding authorities.

All the complaints shall be supervised by the Compliance Office of América Móvil, who in turn, is liable with the Committee of Audit and Corporate Practices of América Móvil.



The Compliance Office is the instance in charge of supervision and operation of the Whistleblowing, and it shall send to the Ethics Committees of each Subsidiary, the corresponding complaints, for their proper investigation.

12. Doubts and Comments

Should you have any question related to this Policy or some comment or suggestion, write to us to the email address yocumplo@americamovil.com