

Privacy Notice

Privacy Notice: The FRATELLI PROJECT MANAGEMENT RIVIERA MAYA SA DE CV with address for all purposes and obligations related to this PRIVACY POLICY is located on CALLE 28 LT.2, MZ. 421, D1, TULUM PUEBLO, 77780, TULUM, Q.R, will use your personal data collected for the following purposes: a) To verify your identity and economic situation; b) Prepare a file for the preparation of documents necessary for the provision of the products we offer; c) Preparation of purchase offer; d) Preparation of the contract for the promise of sale and, where applicable, the contract of promise of trust; e) Preparation of deed of sale, and in its case of irrevocable transfer of ownership trust; f) Respond to your information, attention and service requirements; g) File of records and file for follow-up of future services or procedures; h) Financial management, billing and collection; i) Comply with the obligations and commitments we have contracted with you; j) Send you information related to the operation contracted. For more information about the treatment and the rights that can be asserted, you can access the comprehensive privacy notice through the website www.fratelli.design If you have any questions or comments regarding the PRIVACY NOTICE, you can contact our Department of Protection of Personal Data, through the following email address: info@fratelli.design

NOTICE OF PRIVACY

FRATELLI GROUP

By means of this NOTICE OF PRIVACY, the entities of the FRATELLI GROUP, inform you of the terms in which the "Personal Data" they

collect will be treated, for which, we recommend that you read carefully the following information:

1.- DEFINITIONS.

For purposes of this NOTICE OF PRIVACY, the terms indicated below shall have the meanings indicated in this document, whether written in the singular or in the plural:

1.1. "Personal Data": Any information concerning an identified or identifiable natural person.

1.2. "Sensitive Personal Data": Those "Personal Data" that affect the private sphere of the Owner, or whose improper use could give rise to any type of discrimination or entail a serious risk for the Holder. Those data that may reveal personal aspects of the Holder are considered within this category, such as racial and ethnic origin, current and future health status, genetic information, religious, philosophical and moral beliefs, union affiliation, political opinions, sexual preference or financial situation. .

1.3. "ARCO Rights": Right of the Holder of the "Personal Data" to ask the Responsible for Access, Rectification, Cancellation or Opposition with respect to said data, in accordance with the provisions of the LFPDPPP and its Regulations.

1.4. "Dissociation": The procedure by which the "Personal Data" can not be associated to the "Holder" nor allow, by its structure, content or degree of disaggregation, the identification of the same.

1.5. "Responsible": The physical or moral person who alone or jointly with other natural or legal persons treat "Personal Data" on behalf of and by instruction of the "Responsible", according to the processes, terms and conditions indicated by it.

1.6. "LFPDPPP": Federal Law for the Protection of Personal Data in Possession of Individuals.

1.7. "Regulation": Regulation of the Federal Law on the Protection of Personal Data Held by Private Parties.

1.8. "Responsible": Is each entity belonging to the FRATELLI GROUP, acting individually or in conjunction with other entities of the same group collect "Personal Data" for treatment according to the purposes outlined in this NOTICE OF PRIVACY. For these purposes, you can be Responsible:

FRATELLI PROJECT MANAGEMENT RIVIERA MAYA SA DE CV

1.9. "Holder": The individual to whom the "Personal Data" corresponds.

1.10. "Transfer": The communication of "Personal Data" inside or outside the national territory, made to a person other than the "Owner" or the "Responsible".

2.- IDENTITY AND ADDRESS OF THE RESPONSIBLE. The "Responsible" referred to in numeral 1, subsection 1.8. of this NOTICE OF PRIVACY, states that it is a company legally constituted under Mexican law and will respond individually to the "Personal Data" that it collects and designates as domicile for all purposes and obligations related to this NOTICE OF PRIVACY the property located on located on CALLE 28 LT.2, MZ. 421, D1, TULUM PUEBLO, 77780, TULUM, Q.R The "Responsible" informs you the following: That in accordance with the provisions of the "LFPDPPP" and its "Regulations", the "Responsible" has adopted and maintains the necessary security measures, administrative, technical and physical, within its reach to protect the "Personal Data" against damage, loss, alteration, destruction or unauthorized use, access or treatment. That the "Responsible" has a Department of Data Protection.

3.- FOR WHAT PURPOSES ARE THEY COLLECTED AND THEY USE THEIR PERSONAL DATA?

Your "Personal Data" will be used for the following main purposes: To verify your identity and economic situation. Prepare a file for the preparation of documents necessary to provide the products we offer. Preparation of purchase offer. Elaboration of a promise of purchase agreement, and, if applicable, a promise contract for a trust. Preparation of deed of sale, and in its case of irrevocable transfer of ownership trust. Respond to your information, attention and service requirements. File of records and file for follow-up of services or future procedures. Financial management, billing and collection. To comply with the obligations and commitments that we have contracted with you. Send you information related to the operation contracted.

In addition, we will use your personal information for the following secondary purposes that are not necessary for the requested product, but that allow us and facilitate to provide a better service: Providing the services of advice, professional consulting, services or future procedures. Send you information of interest. Your "Personal Data" could be used for purposes that are compatible with those described and can be considered analogous. The "Responsible" informs you that by granting your consent for the processing of your "Personal Data", you authorize the "Responsible" to use them to send advertising information through the means that the "Responsible" has at your disposal, such as e-mail, cellular telephony (SMS message, MMS), social networks, or any other similar means of electronic communication that may be developed, as well as sending and collecting information through quality surveys.

In the event that the "Owner" requires any new product or service, it will be understood that you consent to the processing of your data in accordance with the aforementioned secondary purposes and, where appropriate, to transfer your "Personal Data" to third parties when this results precise or convenient for the "Responsible" can comply with the obligations arising from the legal relationship between the "Owner" and the "Responsible" We inform you that the "Responsible" has video surveillance systems inside and outside their offices . The images and sounds captured by the cameras will be used for security of the "Owner", as well as for the monitoring and control of physical access to their facilities. The same treatment as referred to in this NOTICE OF PRIVACY, will have the "Personal Data" collected in the future, without prejudice to which the Holder may exercise at any time their right of opposition, as provided in this NOTICE OF PRIVACY .

In case you do not want your "Personal Data" to be treated for any of the aforementioned purposes, you can state which ones are from this moment, indicating them in the following lines:

"... I do not consent that my" Personal Data "be used for these purposes:

Main purposes identified in subsections _____.

Secondary purposes identified in subsections _____.

The refusal to use your "Personal Data" for these purposes may not be a reason for the "Responsible" to deny the services and products you request or hire.

4.- WHAT PERSONAL DATA ARE OBTAINED FROM YOU AND FROM WHERE ARE YOU OBTAINED? For the aforementioned purposes, the "Responsible" informs you that it collects your "Personal Data" in different ways: When you visit our website or use our online

services. By phone or email. When the "Owner" provides his "Personal Data" personally or through his agent or legal representative. When the "responsible" obtains information through other sources of public access that are allowed by law (Telephone or work directories, websites). "Personal Data" that is collected:

- Identification data. Information concerning a natural person that allows to differentiate it from others, such as: name; nationality, place of birth, date of birth; civil status; official identification; immigration document; handwritten and electronic signature; Federal Taxpayers Registry (RFC); Single Registry of Population Registry (CURP); military primer number; Photography; age, among others.
- Contact information. Information that allows you to keep or contact you, such as: address; email; landline; cell phone.
- Labor data. Information concerning a natural person relative to his employment, such as: occupation; profession; charge or commission; job performance; professional experience; Market Stall; business turnaround; business name; work address; institutional email; institutional telephone; labor references; date of admission; seniority, date of departure.
- Academic data. Information concerning a natural person that describes their preparation, aptitudes, development and professional or technical orientation, endorsed by educational institutions, such as: educational trajectory; Titles; professional license; certificates; recognitions; among others.
- Patrimonial or financial data. Information concerning a natural person relative to his assets, rights, charges or obligations susceptible of economic valuation, such as: movable and immovable property; tax information; credit history; income and expenses; bank accounts; insurance; afores; bail, credit card number, security number.

The "Responsible" does not collect or treat "Personal Data" of minors

or incapacitated when they do not have the express consent of their parents, guardians or legal representatives.

5.- WHAT SENSITIVE PERSONAL DATA ARE USED? The "Responsible" informs you that, in addition to the "Personal Data" mentioned above, for the purposes stated in this PRIVACY NOTICE, the following "Sensitive Personal Data" are used and processed, which require special protection: Medical and / or psychological background (state of health, ailments and / or medical history). Sexual preference Criminal record. Racial or ethnic origin. Genetic information. Philosophical and moral religious beliefs. The "Responsible" requires your express consent (acceptance) (a) for the treatment of their "Sensitive Personal Data", and undertakes that they will be treated under the strictest security measures that guarantee their confidentiality. The "Responsible" informs you that by granting your consent for the treatment of your "Sensitive Personal Data", you authorize the "Responsible" to use them for the purposes indicated above. "... I consent and agree that my" Sensitive Personal Data "will be treated in accordance with the terms and

conditions of this PRIVACY NOTICE. Signature of the holder ..."

6.- TRANSFER OF PERSONAL DATA:

The "Responsible" informs you that your "Personal Data" will only and exclusively be shared in national territory with the following people:

ABRAHAM RODRÍGUEZ SÁNCHEZ

For compliance with the obligations agreed with the owner of personal data. For the preparation of documents that will be presented and / or ratified and / or signed before the notary; legal advice; juridical services. (*)

Mexico

For compliance with the obligations agreed with the owner of personal data. For property deed; certification of signatures; subscription of documents; notarial faith; legal advice; notary services. (*)

FRATELLI PROJECT MANAGEMENT RIVIERA MAYA SA DE CV

Mexico

For the fulfillment of the obligations agreed with the "Holder" (*)

FRATELLI PROJECT MANAGEMENT RIVIERA MAYA SA DE CV

Mexico

For the fulfillment of the obligations agreed with the "Holder" (*)

FRATELLI PROJECT MANAGEMENT RIVIERA MAYA SA DE CV

Mexico

For the fulfillment of the obligations agreed with the "Holder" (*)

The "Responsible" informs you that for transfers indicated with an asterisk (*) your consent is required. If you do not express your refusal for such transfers, we will understand that you have granted it to us.

In the event that the "Owner" does not authorize your personal data to be shared with the following third parties, please express your negative by marking with an X inside []:

ABRAHAM RODRÍGUEZ SÁNCHEZ

FRATELLI PROJECT MANAGEMENT RIVIERA MAYA SA DE CV

Your "Personal Data" will in no case be disclosed, shared or transferred to other third parties without your consent, but only and exclusively to the recipients that you authorized in this section and

when the LFPDPPP imposes the obligation to send us the information we have collected to the competent authorities.

7.- HOW TO ACCESS, RECTIFY, CANCEL OR OPPOSE THE USE AND PROCESSING OF YOUR PERSONAL DATA (ARCO RIGHTS) OR REVOKE YOUR CONSENT FOR THE TREATMENT OF YOUR DATA?

The "Holder" has the constitutional right to access and know the "Personal Data" that the "Responsible" has and the details of the treatment and use thereof, as well as to correct and correct them if they are inaccurate or incomplete; cancel them and eliminate them when you consider that they are not required for any of the purposes indicated in this PRIVACY NOTICE, or that they are being used for purposes not authorized by you or the contractual or service relationship has ended, or oppose the use of the same. If you want to know the requirements and procedures for the exercise of "ARCO Rights", as well as to resolve any doubt regarding the processing of your personal information, we ask you to contact the "Responsible" of Personal Data of FRATELLI GROUP to the email info@fratelli.design

8.- HOW TO PERFORM ARCO RIGHTS?

If the "Holder" wishes to perform their "ARCO Rights", send your request to our Personal Data Protection Department at info@fratelli.design

9.- HOW TO REVOKE YOUR CONSENT FOR THE USE OF YOUR PERSONAL DATA?

The "Holder" may revoke the consent that in his case has been granted to the "Responsible" for the treatment of his "Personal Data". However, it is important to take into account that not all of them will be able to attend your request or conclude the use immediately, since it is possible that due to some legal obligation we

need to continue treating your "Personal Data". Also, you must consider that for certain purposes, the revocation of your consent will imply that the "Responsible" can not continue to provide the service you requested, or the conclusion of your relationship with us. The procedure and requirements for the revocation of consent is as follows: To revoke your consent you must prepare your application that contains your full and correct name, address, email, description of what you request and must accompany it with a copy of official identification; present it with the aforementioned elements before the Head of our Data Protection Department at any of the following addresses: Address: CALLE 28 LT.2, MZ. 421, D1, TULUM PUEBLO, 77780, TULUM, Q.R Email: info@fratelli.design In the event that the "Holder" submits his / her

10.- HOW CAN YOU LIMIT THE USE OR DISCLOSURE OF YOUR PERSONAL INFORMATION?

In order that you can limit the use and disclosure of your personal information, the "Responsible" offers you the following means:

- Its registration in the Public Registry to Avoid Publicity, which is in charge of the Federal Attorney's Office, with the purpose that your personal data are not used to receive publicity or promotions of companies of goods or services. For more information about this registry, you can consult the PROFECO Internet portal, or contact it directly.

- Return of the holder's file. Just send your request to our Department of Protection of Personal Data to the email info@fratelli.design

For more information send an email to the following address info@fratelli.design

11.- USE OF COOKIES, WEB BEACONS AND JAVASCRIPT

The "Responsible" informs you that cookies, web beacons and other technologies are used on the Internet page through which it is possible to monitor the behavior of the "Owner" as an Internet user, provide a better service and user experience. by browsing the "Responsible" page, as well as offering new products and services based on your preferences.

Cookies are a small piece of information sent automatically by the "Responsible" website, which are stored in your browser. In this way, the website can consult this information to know the previous activity of the user and streamline some procedures such as maintaining the session or identifying which sections of the site you have already visited.

Web beacons in conjunction with JavaScripts of web metrics allow you to store information about the patterns of use of the website. You are informed that the "Responsible" uses these tools to obtain statistical information such as the following:

- Type of browser and operating system, Internet pages consulted, origin of the visit, access IP address, time spent on our site, among other statistical data.

Likewise, the "Responsible" informs you that the "Personal Data" obtained through these technologies are not shared with any third party.

12.- MODIFICATIONS TO THE PRIVACY NOTICE:

This PRIVACY NOTICE may suffer modifications, changes or updates derived from new legal requirements; of our own needs for the products or services offered by the "Responsible"; of their privacy practices; of changes in the business model, or for other reasons. The "Responsible" is committed to keep you informed and notify you of any changes that may occur to this NOTICE OF PRIVACY, through

the publication of such changes, modifications or updates, on the page www.fratelli.design It is the obligation of the owner to visit periodically said site in order to verify the most current version of the PRIVACY NOTICE.

13.- WHAT TO DO IF YOU HAVE DOUBTS, COMMENTS OR REQUIRE MORE INFORMATION?

If you have any questions or comments regarding the PRIVACY NOTICE, you can contact us through the following email address info@fratelli.design. If after having exercised your ARCO Rights before the "Responsible" by means of the mechanisms established in this NOTICE OF PRIVACY, you consider that the answer has been unsatisfactory or incomplete; or presumes that your right to protection of "Personal Data" has been damaged by any conduct or action on the part of the "Responsible"; or has evidence that in the treatment of your "Personal Data" there is a violation of the provisions of the Federal Law on Protection of Personal Data Held by Individuals, you can file the complaint or complaint with the IFAI. For more information visit: <http://www.ifai.org.mx>

This PRIVACY NOTICE was modified for the last time on January 26 2021.