

COMPREHENSIVE PRIVACY NOTICE
EMPLOYEES

In compliance with local regulations on personal data protection (hereinafter the “regulations”) and other applicable provisions, and so that you can make informed decisions about how we can process your personal information, we provide you with this notice that details the use of your personal data, identifying the entity responsible for your information; the purposes or actions that motivate the collection, use and custody of your personal data; the third parties to whom your personal data will or may be transferred; the mechanisms for you to exercise your rights, among other information.

This Privacy Notice will be made available to people (employees) who have decided to start working with ARCA CONTINENTAL through physical or electronic means. Employees may consult this privacy notice at any time through our website, available at the following link: [Notice for employees](#)

In addition to being provided and communicated by physical or electronic means, employees may request a copy of the latest version of this document through the local Data Protection Officer, whose contact information can be found in the International Section of this notice.

Who is responsible for your personal data?

“ARCA CONTINENTAL” is a corporate group with an international presence and for this reason, through this document we provide you with the information necessary to identify the local entity that will be responsible for your personal data.

For the purposes established in this Notice, the entity responsible for your personal data will be the one that initially collects your information through physical or electronic means. You can find the name of said entity in the contractual and/or commercial information that links you to us.

The complete list of ARCA CONTINENTAL Responsible Entities as well as addresses for hearing and receiving notifications in each country is available in Annex 1, attached hereto. Each entity will be individually referred to as “the Controller” in this Notice.

What data do we use, and may we request?

For the purposes established in this Privacy Notice, the Controller may process the following categories of personal data:

- Identification and contact data.
- Location data.
- Academic data.
- Socioeconomic data.
- Employment data.
- Asset and financial data.
- Habits and interests’ data.
- Immigration data.
- Family data.
- Sensitive data (biometric data, health data, union affiliation, among others).

Processing of sensitive personal data

For the fulfillment of the purposes informed in this Privacy Notice and, when your position or workplace requires specific measures for the control of your attendance and access to facilities, the Controller may request your biometric data. In addition, for compliance with legal provisions regarding social security and labor matters; management actions of benefits granted by the Controller; conducting medical and health questionnaires, the Controller may process personal data about your health status. When we must request this information, we will obtain your express and written consent, through the corresponding physical or electronic means.

What will we use your personal data for?

The Controller may process your personal data for the following purposes:

Primary purposes:

The Controller will process your personal data for the following purposes, necessary for compliance with the obligations that originate and derive from our legal employment relationship.

1. Preparation of your employment file.
2. If applicable, for conducting medical examinations.
3. For the administration of physical access to ARCA CONTINENTAL facilities.
4. The administration of electronic access to the infrastructure and technological systems of ARCA CONTINENTAL.
5. Administration of payroll services, including but not limited to, payment of overtime, salary increases and other benefits.
6. Enrollment in medical insurance for you and/or your family members, major medical expense insurance, and other insurance that ARCA CONTINENTAL deems necessary, as well as enrollment in voluntary insurance that you request in accordance with agreements signed by ARCA CONTINENTAL with various providers.
7. Designation of beneficiaries in life insurance policies and before competent authorities.
8. Nutrition programs, accident prevention, and medical examinations.
9. If applicable, provide you with medical care in case of emergency and/or, in such case, if you voluntarily request it in our office. For this, ARCA CONTINENTAL may process the personal data necessary to create a clinical record electronically and/or physically, as appropriate, in compliance with applicable health regulations.
10. Provide you with training.
11. Administration of performance and personal and/or professional development tools.
12. Creation and implementation of statistical and analytical processes.
13. Compliance with the provisions of the employment contract that you sign with ARCA CONTINENTAL and all those that apply according to the specific laws on Labor and Social Security matters.
14. To carry out authentication and identification activities in the use of our technological tools and platforms, as well as to allow you access to them.
15. Evaluation, design and granting, administration, collection and procurement of benefits, educational support and scholarships.

16. Carry out immigration procedures and/or renewal of the corresponding immigration permits (in the case of expatriates).
17. If applicable, to adequately manage labor relations, including representation and negotiation with unions, as well as compliance with contractual and legal obligations.
18. For the investigation and management of complaints received through our system regarding possible violations of the code of ethics.
19. If applicable, to issue work certificates, even after the legal relationship with you has concluded.
20. If applicable, monitoring of the Responsible Party's devices and fleets using telemetry and/or geolocation technologies, for security and labor control purposes.
21. To carry out all the necessary activities for the management and administration of your job and other employment benefits.

In addition, ARCA CONTINENTAL will process the personal data of third parties indicated by you, in case of an emergency.

Who can we share your data with?

Your personal data may be transferred within Mexico or abroad, to the following categories of recipients and for the identified purposes:

- Federal, state and/or municipal administrations and authorities; commissions; institutes, regulatory entities; judicial or administrative authorities; and national and/or foreign government entities, for compliance with information, transparency and fraud prevention obligations, crimes or other illicit activities, as well as for compliance with judicial or administrative requirements issued by competent authorities.
- Banks or other financial entities, for compliance with payment obligations.
- Service providers that operate as data processors, in connection with the services they provide to the Responsible Party for the fulfillment of the purposes established in this notice. The Responsible Party will require service providers to implement security measures that are adequate and necessary for the protection of the data processed in accordance with the Law and the sensitivity of this information.

Any additional transfer of your personal data that requires your consent will be informed in advance, through the communication and updating of this Privacy Notice and prior to carrying out that data communication.

Rights of Personal Data Owners

The regulations govern specific rights for personal data owners; these rights are generally known as "ARCO rights" and include the following:

- **Access:** the right you have to know what data we have about you, as well as to know how we use or share it.
- **Rectification or Inclusion:** the right you have to request at any time the rectification of your data, if for any reason they are incorrect, inaccurate or incomplete in our databases.
- **Cancellation:** the right to request that we delete your information, starting with its blocking and subsequent definitive deletion.
- **Opposition:** the right you have to indicate a legitimate reason why we should stop using your personal data.

In some countries, these rights also include:

- **Portability:** the right to obtain a copy of your personal data in a structured electronic format, which allows you to continue using it with another controller.¹

To exercise any of your rights, you must submit a request to the Personal Data Officer of your locality, through the means established in the international section of this Notice.

The request must contain or be accompanied by:

1. Your full name and address, or another means to communicate the response to your request,
2. Copy of an identification / card (or a power of attorney, if someone exercises the right on your behalf),
3. A description of the right you want to exercise, as well as the information related to it, and
4. Any other information that you consider important to address your request or locate your personal data.

The Controller will respond to your request within the business days established by local regulations following the date it is sent and received. If the request is appropriate, we will make it effective within the business period marked by local regulations following the date on which the response is communicated. In the event that the information and/or documentation provided in your request is incomplete, erroneous and/or insufficient, or the necessary documents to prove your identity or the corresponding legal representation are not attached, we will request the correction and rectification of the deficiencies in order to process said request.

The use of electronic means for the exercise of ARCO Rights authorizes the Controller to respond to the corresponding request through the same means, unless you indicate another means of contact in your request, clearly and expressly.

The right of cancellation is not absolute. Please note that the Controller must retain information to comply with various legal obligations and that to do so it may share your personal data with other entities or organizations. In such cases, the right of cancellation may have to be requested from the entity that received your personal data.

RETENTION OF PERSONAL DATA:

Personal data will be kept for no longer than necessary to fulfill the purpose of its processing. To ensure that personal data is not kept longer than necessary, the Personal Data authority or the data controller will establish the legal terms in accordance with the applicable regulations, for its deletion or periodic review.

PRIVACY NOTICE UPDATE:

Due to the continuous improvement of our processes, ARCA CONTINENTAL may make corrections and updates to this Privacy Notice at any time and without prior notice. Modifications to this Privacy Notice will be published on our website. Please check our website regularly to see the changes that may be published.

¹ Applicable for Ecuador

INTERNATIONAL PARTICULAR PROVISIONS FOR MEXICO, ARGENTINA, ECUADOR AND PERU

MEXICO

Personal data owners established in Mexico must observe the following specific provisions:

Secondary Purposes

In addition, if you do not object, ARCA CONTINENTAL will process your personal data for additional purposes that, although not necessary for the employment relationship, contribute to providing you with better care:

1. For the improvement and promotion of the work environment and climate.
2. Your personal image (photos and/or videos) may be used for the preparation of informative and/or promotional material.

ARCO Rights

The owner may exercise their rights of access, rectification, cancellation or opposition by sending an email to the email address derechosarcomx@arcacontal.com, indicating the known name of the Controller of their data, the reasons for their request and including that information or documentation that allows them to be identified (for example, name and address), as well as a clear description of the personal data in relation to which they wish to exercise any of the rights.

The Controller will respond to your request within 20 (twenty) business days following the date it is sent and received. If the request is appropriate, the Controller will implement it within 15 (fifteen) business days following the date the response is communicated. In the event that the information and/or documentation provided in your request is incomplete, erroneous and/or insufficient, or the necessary documents to prove your identity or the corresponding legal representation are not attached, ARCA will request the correction and rectification of the deficiencies in order to process your request. You will have 10 (ten) business days to address the requirement and correction of the request; otherwise, it will be considered not submitted.

Revocation of consent and limitations on the use of your personal data

You may revoke your consent for the processing of your personal data, without retroactive effects, in all those cases in which such revocation does not imply the impossibility of fulfilling obligations derived from a current legal relationship between you and the Controller.

The procedure for the revocation of consent, if applicable, will be the same as that established in the immediately preceding section for the exercise of ARCO rights.

Questions or clarifications

If you have any questions or clarifications about this Privacy Notice, you can contact our Personal Data Officer through the following email address derechosarcomx@arcacontal.com

ARGENTINA

Personal data owners established in the Republic of Argentina must observe the following specific provisions:

Rights of the Owners

The owner of personal data may exercise their rights of information, access, rectification and deletion by sending an email to derechosarcoarg@arcacontal.com , specifying the reasons for their request and including information or documentation that allows identifying the owner of the personal data (for example, name and address), as well as a clear description of the personal data in relation to which they seek to exercise any of the rights.

The owner of personal data has the power to exercise the right of access to them free of charge at intervals of no less than six months, unless a legitimate interest is proven for this purpose in accordance with the provisions of article 14, paragraph 3 of Law No. 25,326.

The National Directorate for the Protection of Personal Data has the power to address complaints and claims filed in relation to non-compliance with personal data protection regulations.

If the request meets the requirements, the Controller will respond to your access request within 10 (ten) days and to the update/rectification and deletion request within 5 (five) business days.

Questions or clarifications

If you have any questions or clarifications about this Privacy Notice, you can contact our Personal Data Officer through the following email address derechosarcoarg@arcacontal.com

PERU

Personal data owners established in Peru must observe the following specific provisions:

Rights of the Owners

The owner of personal data may exercise their rights of access, rectification, cancellation and opposition, by sending an email to derechosarcoperu@arcacontal.com , specifying the reasons for their request and including information or documentation that allows identifying the owner of the personal data (for example, name and address), as well as a clear description of the personal data in relation to which they seek to exercise any of the rights.

Response times

- Right to Information: If the request meets the requirements previously established, the Controller has 8 (eight) days to respond to your request.
- Right of Access: If your request meets the requirements previously established, the Controller has 20 (twenty) days to respond to the owner; if your request is considered estimated, the response will be made effective in the following 10 (ten) days following the response.
- Right of rectification, cancellation or opposition: If the request meets the requirements, the deadline to respond will be 10 (ten) from the moment of its presentation.

If the request does not meet the requirements or needs clarification, the Manager may request the missing information within the following 5 (five) days; otherwise, it will be considered not submitted.

Description of the Data Banks

ARCA CONTINENTAL has its databases registered with the National Authority for the Protection of Personal Data. The registration details are as follows:

Owner of the personal data bank	Name of the Data Bank	Resolution	Certificate
AC COMERCIAL DEL PERÚ S.A.C.	Personnel and employee file	2361-2023	25831
AC LOGISTICA DEL PERÚ S.A.C.	Personnel and employee file	3918-2023	26867
ARCA CONTINENTAL LINDLEY S.A.	Personnel and employee file	3433-2023	4263
EMBOTELLADORA LA SELVA S.A.	Personnel and employee file	3442-2023	5296
EMPRESA COMERCIALIZADORA DE BEBIDAS S.A.C.	Personnel and employee file	1885-2023	13398
VEND S.A.C.	Workers	4661-2024	29696

Data Processors

Processor	RUC	Address
OFFICE OF PENSION STANDARDIZATION ONP	20254165035	JR. BOLIVIA NRO. 109 INT. 16 CENTRO CÍVICO Y COM. LIMA (PISO 16) LIMA - LIMA - LIMA
PRIMA AFP S.A.	20510398158	AV. JUAN DE ARONA NRO. 830 (PISO 11) LIMA - LIMA - SAN ISIDRO
AFP HABITAT S.A.	20551464971	AV. JORGE BASADRE NRO. 592 (PISO 6 OF. 608 - 609) LIMA - LIMA - SAN ISIDRO
PROFUTURO AFP S.A.	20142829551	CAL. CORONEL ANDRES REYES NRO. 489 URB. JARDIN LIMA - LIMA - SAN ISIDRO
AFP INTEGRAL S.A.	20157036794	AV. CANAVAL Y MOREYRA NRO. 522 INT. P6Y5 URB. EL PALOMAR (PISOS 6 Y 5) LIMA - LIMA - SAN ISIDRO
Superintendency of Tax Administration – SUNAT	20131312955	AV. GARCILASO DE LA VEGA NRO. 1472 LIMA - LIMA - LIMA
BCP – Banco de Crédito del Perú.	20100047218	JR. CENTENARIO NRO. 156 URB. LADERAS DE MELGAREJO LIMA - LIMA - LA MOLINA
Scotiabank - Scotiabank Peru S.A.A.	20100043140	AV. CANAVAL Y MOREYRA NRO. 522 (CRUCE CON REPÚBLICA DE PANAMA) LIMA - LIMA - SAN ISIDRO
BBVA - BBVA Banco Continental	20100130204	AV. REPUBLICA DE PANAMA NRO. 3055 URB. EL PALOMAR (.) LIMA - LIMA - SAN ISIDRO
Interbank – Banco Internacional Del Perú	20100053455	AV. CARLOS VILLARAN NRO. 140 URB. SANTA CATALINA LIMA - LIMA - LA VICTORIA
Banco De La Nación	20100030595	AV. JAVIER PRADO ESTE NRO. 2499 URB. SAN BORJA (.) LIMA - LIMA - SAN BORJA

Ministry of Labor and Employment Promotion.	20131023414	AV. SALAVERRY NRO. 655 LIMA - LIMA - JESUS MARIA
GRM Document Management	20508932350	AV. LA CHUTANA MZA. Q LOTE. 4 Z.I. CENTRO INDUSTRIAL LA CHUTANA (ALTURA KM 60.80 PANAMERICANA SUR) LIMA - CAÑETE - CHILCA
Arca Continental, S.A.B. DE C.V.	EAR-981110-B67	Av. San Jerónimo 813 Pte. C.P. 64640, Monterrey, México
MERCOSUR		Piso 1 Edificio MERCOSUR Montevideo, Uruguay CP 11200

Questions or clarifications

If you have any questions or clarifications about this Privacy Notice, you can contact our Personal Data Officer through the following email address derechosarcoeperu@arcacontal.com

ECUADOR

Personal data owners established in Ecuador must observe the following specific provisions:

Secondary purposes:

In addition, if you do not object, ARCA CONTINENTAL will process your personal data for additional purposes that, although not necessary for the employment relationship, contribute to providing you with better service:

1. To improve and promote the work environment and climate.
2. Your personal image (photos and/or videos) may be used for the preparation of informative and/or promotional material.

Rights of the Owners

The owner of the personal data may exercise their rights of access, rectification, cancellation, opposition and portability, by sending an email to ARCA CONTINENTAL at derechosarcoecu@arcacontal.com, specifying the reasons for their request and including that identification information of the owner of the personal data (for example, name, identification number, address and email address), attaching their identity document, as well as a clear description of the personal data in relation to which they seek to exercise any of the rights.

Right to Portability of personal data:

That for the case and in accordance with the Organic Law on the Protection of Personal Data, Portability of Personal Data is considered the right that you have to request the delivery of your personal data in a compatible, updated, structured, common, interoperable and machine-readable format, or transfer them to the person in charge that you indicate.

Once the right to portability of personal data has been fulfilled, we will eliminate your personal data unless you provide for its conservation.

If the request does not meet the requirements or needs clarification, the Data Protection Officer may request the missing information within 5 (five) business days. You have 10 (ten) business days to respond to the requirement or complete the request. If you do not respond, the request will be archived and you will be notified of the rejection, but you can resubmit it.

Doubts or clarifications

If you have any questions or clarifications about this Privacy Notice, you can contact our Personal Data Officer through the following email: derechosarcoecu@arcacontal.com

Last updated: June 13, 2025

ANNEX 1: RESPONSIBLE ENTITIES

Responsible Entities	Country
ARCA CONTINENTAL, S.A.B DE C.V.	Mexico
DISTRIBUIDORA ARCA CONTINENTAL, S. DE R.L. DE C.V.	Mexico
BEBIDAS MUNDIALES, S. DE R.L. DE C.V.	Mexico
NACIONAL DE ALIMENTOS Y HELADOS, S.A. DE C.V.	Mexico
PROCESOS ESTANDARIZADOS ADMINISTRATIVOS, S.A. DE C.V.	Mexico
INDUSTRIAL DE PLASTICOS ARMA, S.A. DE C.V.	Mexico
COMPAÑIA TOPO CHICO, S. DE R.L. DE C.V.	Mexico
BBOX VENDING, S. DE R.L. DE C.V.	Mexico
COALIMEXSA ALIMENTOS MEXICANOS, S.A. de C.V.	Mexico
COALIMEXSA SERVICIOS, S.A. de C.V.	Mexico
TOSTIRICAS NIETO, S.A. DE C.V.	Mexico
SOLUCIONES BRIO, S.A.P.I DE C.V.	Mexico
SALTA REFRESCOS, S.A.	Argentina
AC BEBIDAS, S. DE R. L. DE C. V. (SUCURSAL) ECUADOR	Ecuador
BEBIDAS ARCA CONTINENTAL ECUADOR ARCADOR, S.A. ECUADOR	Ecuador
DISTRIBUIDORA IMPORTADORA DIPOR, S.A. ECUADOR	Ecuador
HOLDING TONICORP, S.A. ECUADOR	Ecuador
INDUSTRIAS ALIMENTICIAS ECUATORIANAS INALECSA S.A.S. ECUADOR	Ecuador
INDUSTRIAS LÁCTEAS TONI, S.A. ECUADOR	Ecuador
PLÁSTICOS ECUATORIANOS, S.A. ECUADOR	Ecuador

Responsible Entities	Country
VENDING DEL ECUADOR, S.A. ECUADOR	Ecuador
EMBOTELLADORA LA SELVA, S.A.C.	Peru
EMPRESA COMERCIALIZADORA DE BEBIDAS, S.A.C	Peru
AC COMERCIAL DEL PERÚ, S.A.C	Peru
AC LOGISTICA DEL PERÚ, S.A.C	Peru
AC CORPORATIVO DEL PERÚ, S.A.C	Peru
ARCA CONTINENTAL LINDLEY, S.A.	Peru
VEND S.A.C.	Peru

Annex 2: Form

Folio:	
Date:	



PERSONAL DATA OWNER INFORMATION:

(Name(s))	(Paternal Surname)	(Maternal Surname)
Document used for identification. (attach a simple copy)		

IF APPLICABLE, DATA OF THE OWNER'S LEGAL REPRESENTATIVE:

(Name(s))	(Paternal Surname)	(Maternal Surname)
Document used for identification. (attach a simple copy)		
Document proving their identity. (attach a simple copy)		

Address (you can decide to indicate your address or your email)	(Street)	(Ext. – Int. Number)	(Neighborhood)	(Locality / Delegation / Municipality)
	(Postal Code)	(State)	(Telephone)	(Email)



INFORMATION ON THE EXERCISE OF ARCO RIGHTS:

Type of right	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Access	Rectification	Opposition	Cancellation	Portability	Inclusion

	<ul style="list-style-type: none"> • Access: Obtaining your personal data. Generalities and conditions of the treatment. • Rectification: The rectification of your personal data, either because they have changed or because the data obtained is not correct. • Opposition: It is the request that the treatment not be carried out with respect to secondary purposes. • Cancellation: It is the request for the cessation of treatment. • Portability: The owner will have the right to obtain a copy of the personal data that he has provided to the person in charge or that is subject to treatment, in a structured electronic format, of common use and mechanical reading, that allows him to continue using them and transferring them to another person in charge, in case you require it. • Inclusion: The owner of personal data has the right to request the rectification of their data, including the incorporation of missing information relevant to their treatment.
<p>Data on which you want to exercise the Right</p>	<p><i>Please indicate the right you would like to exercise, if applicable, attach the documentation that supports your request.</i></p> <p>(Describe)</p>
<p>Reason.</p>	<p><i>If it is a right of opposition, indicate secondary purposes on which you wish to exercise the right.</i></p> <p>(Indicate)</p>
<p>In case of requesting the revocation of your consent.</p>	<p><i>Indicate the reasons for the revocation of your consent for the processing of your personal data.</i></p> <p>(Describe)</p>
<p>In case of having any questions or complaints regarding personal data.</p>	<p>(Describe)</p>
<p>Delivery of the response</p>	<p style="text-align: center;"><input type="checkbox"/></p> <p>Email: _____</p> <p style="text-align: center;"><input type="checkbox"/></p> <p>Address: _____</p> <p>(One or both can be selected).</p>