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### 1. Purpose

Establish the activities, topics, and frequency to provide training and general communications to Grupo Aeroméxico (GAM) company personnel on the topic of Personal Data Protection.

### 2. Scope

Applicable to all GAM personnel involved in Processing Personal Data, as well as individuals responsible for Personal Data Processing as part of their job functions and responsibilities, who conduct personal data processing for GAM.

### 3. Effective Date

Effective as of December 30, 2021, and supersedes policies on training strategies titled S\_PO\_GADP\_01 Capacitación sobre Protección de Datos Personales and POGAM-DP-11 Estrategia de Capacitación.

### 4. References

- Federal Law for the Protection of Personal Data in Possession of Private Parties (LFPDPPP), published in the Federation Official Gazette on July 5, 2010.
- Regulation for the Federal Law for the Protection of Personal Data in Possession of Private Parties (RLFPDPPP), published in the Federation Official Gazette on December 21, 2011.
  - Article 48 of the RLFPDPPP, In terms of article 14 of the Law, the responsible party must adopt measures guaranteeing due treatment, giving priority to owner interests and a reasonable expectation of privacy. (...)
    - Section II, Implement a training, updating, and awareness program for staff obligations regarding the protection of Personal Data.
  - Article 61 of the RLFPDPPP, to set forth and maintain personal data security and the responsible party shall consider the following actions: (...)
    - Section VIII, train staffers who carry out processing
- General Data Protection Regulation (GDPR), by the European Parliament and the Council, published on April 27, 2016, which became effective on May 25, 2018.
- Article 39.1.b) GDPR states that functions of the Privacy Officer include awareness and training of staff involved in processing operations.

### 5. Definitions

**Processing Areas:** In-house work teams that belong to GAM companies and obtain, use, disclose, or store Personal Data, using different means.

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

**Corporate Privacy Director:** The highest authority at GAM, in terms of Protection of Personal Data. Responsible for promoting compliance with personal data protection regulations, as well as the protection of Personal Data within GAM.

**Responsible:** A private individual or legal entity that alone or in conjunction, handles personal data processing per request of the party in charge.

**Privacy Officer (PO):** The individual designated by each GAM company to comply with activities conducted towards protection of Personal Data within the company.

**Processing:** The collection, use, disclosure, or storage of Personal Data by any means. Use includes any action of access, handling, use, transfer, or disposal of Personal Data.

### 6. Responsible


The Corporate Privacy Director, in collaboration with Privacy Officers, responsible for keeping this policy up to date and promoting its full compliance.

### 7. Documents

Not applicable.

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## 8. Restrictions

Not applicable.

## 9. Penalties

Training for staffers who work on Personal Data Processing for employees and customers, is mandatory and must be enforced. Failure to comply with the provisions of these policies may result in administrative, legal, or labor sanctions, to be determined by the Executive Vice-Presidency of Human Resources and the Vice-Presidency of Legal and Labor Relations.

## 10. Policy

In order to comply with the provisions of national and international regulations regarding the protection of Personal Data, Aeromexico (AM) will provide training on Personal Data Protection, to new and previously hired personnel, as well as to the person in charge who, by reason of their work, is responsible for processing Personal Data to mitigate operational risks.

This training consists of classroom or online courses using Aeromexico's technological platform or that of an external provider.

### 10.1 Responsibilities

#### AM's Privacy Officer is responsible for the following:

- Validating training contents with the support of the POs for GAM companies.
- Requesting content updates from the research and development departments at AM Formación for courses the company has been involved in.
- Coordinating with the talent development area and AM Formación to include the online course on Personal Data protection in training activities for current and new employees.
- Coordinating with internal communications department for purposes of development and implementation of training and communications campaigns on the topic of personal data protection.
- Obtaining statistics on the levels of participation and use (approval) of the courses given, especially in the case of employees who have access to Personal Data of employees and customers.
- In cases of non-compliance with training, either because of lack of participation or no accreditation, a report shall be drafted for the DCP informing of the situation. If necessary, request the intervention by human resources and the leaders of the related areas to conduct the training course. To carry out this activity, the Privacy Officer at AM shall request the support of Pos at other GAM companies.
- Generating a notice to the direct bosses with copy to their Area Director with the participants who did not accredit the course in the established time.
- Requesting to AM Formación research and development area, enrollment for employees who, because of their job functions, require it, with enrollment taking place directly and massively using google forms or by Treatment Areas in accordance with **Annex A**.


#### AM Formación research and development department is responsible for:

- Considering as part of strategy, training plans and programs, corresponding to Personal Data Protection
- Enrolling participants to the online course on the AM Training platform, according to lists received either in bulk or by the Processing Area.
- Sending participants an invitation to the Personal Data protection course, which includes their access credentials to the technological platform.
- Providing tools so that GAM Privacy Officers and the talent development area can generate a report with course results.
- Providing timely attention to participants who have questions or problems using the technological training platform.

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- Updating the online course upon request and using input provided by the GAM Privacy Officer.

### 10.2 Rules for Staff to be Trained

- An obligation to take and accredit the online training on the issue of Personal Data protection for employees of GAM companies and Agents processing personal data as a result of the functions they perform
- From the moment the employee or person in charge receives the invitation, they will have a time limit to take the course defined by the Corporate Privacy Director.
- Passing grade is established as eighty (out of one hundred) and the training platform will issue an accreditation certificate.
- There is a maximum of 3 attempts to pass the course, counted from the moment the employee enters evaluation, even if the employee abandons the session, it is considered as an attempt.
- When the employee does not complete the course in time, their immediate supervisor will receive notification, and will then have 30 calendar days to accredit it. In case the employee does not fully credit their course, their session will be closed to the system and a notification will be sent to their area director
- An email will be required from the participant with a copy to the address they report to requesting a new session to be opened, which will not take more than 5 days.


### 10.3 Topics to be covered

The training program shall be conducted every year and the topics to be covered will be divided preferably, on a quarterly basis, in alignment with objectives of the Legal Compliance area and in coordination with other areas involved in this process, such as talent development, internal communication, and AM Training, among others.

The following table lists some of the topics to be covered in the training and communications sessions (but not limited to) on the topic of Personal Data Protection.


Activity	Frequency	Addressed to:
<b>A. General online course on personal data protection, referencing issues such as:</b> <ul style="list-style-type: none"> <li>• Basic LFPDPPP concepts; personal data classification; participating authorities; processing personal data, responsible, controller, consent and types, privacy notice types and their use, project evaluation, personal data protection clauses, ARCO rights.</li> </ul>	Once per year or as requested by departments	CPDP, Privacy Officers area members, privacy officers, all personnel who works with data processing, requesting areas
<b>B. Assessment to measure the degree of progress in subject matter knowledge</b> <ul style="list-style-type: none"> <li>• As part of online training</li> </ul>	Once per year	CPDP Members, Privacy officers, areas involved with personal data processing and requesting areas
<b>C. Online or in-person reinforcement workshop on specific topics of personal data matters such as:</b> <ul style="list-style-type: none"> <li>• Basic Concepts, Privacy Notices, ARCO Rights, Obtaining Consent.</li> </ul>	Once per year	Department heads in charge of personal data processing or per department request

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<b>D. In person or online training for privacy officers</b>	Once per year and every time Privacy Officers change	Privacy Officers
<b>E. Communication to GAM staff regarding:</b> <ul style="list-style-type: none"> <li>Guidelines to follow resulting from existing privacy policies</li> <li>Communicating procedures to be followed in personal data protection</li> </ul>	Quarterly	All personnel processing personal data
<b>F. GAM communication to GAM personnel:</b> <ul style="list-style-type: none"> <li>The importance of reporting changes in the purpose of operating involving personal data, information transfers, new technological platforms, security breaches, etc.</li> </ul>	Twice per year	All personnel processing personal data
<b>G. Email communications</b> <ul style="list-style-type: none"> <li>To inform on the importance of leadership and the need to encourage personnel under their charge to comply with the Personal Data protection regulations and to adhere to the privacy policies established by GAM.</li> </ul>	Twice per year	Privacy officers GAM companies
<b>H. Promote the implementation of screen savers to be used in institutional devices and equipment</b> <ul style="list-style-type: none"> <li>Communication of training dates, important points in security measures to be considered in the protection of Personal Data, GAM's commitment to the protection of data privacy for owners</li> </ul>	Permanent	All personnel
<b>I. Reinforcement of data protection during general induction training courses for the general compliance program.</b> <b>J. The need to comply with the regulations on the subject and its main objective, existence of a Personal Data Protection Council, invitation to register for the online course on Personal Data Protection, invitation to review privacy policies and procedures, real case of data protection, informing the course can take place in person or online.</b>	Every general training session for the compliance program	All personnel, GAM companies
<b>K. Communicate changes in legislation or in internal regulations</b>	Every time a change arises	Council on personal data protection, privacy officers, processing areas

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#### 10.4 Communications Mechanisms

Part of the job functions of the Privacy Officer, in coordination with the Corporate Privacy Director, include communicating official messages developed on the topic, both internally and to the companies in charge of the Processing of Personal Data.

The line of communication of the aforementioned topics should be top-down, in order to include all personnel that takes part in GAM's commitment towards national and international regulations on the subject.

The different media should be selected or substituted according to relevance that might exist among GAM personnel, in coordination with the internal communication area. Some means include:

- Aeronews, screens, objects that may be useful for employee with brief messaging containing relevant information on the topic, such as: mousepads, dividers, agendas, calendars flyers, posters, Comic Books, institutional magazines, websites dedicated to the issue, among others.

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## Annex A

The purpose of this annex is to provide guidance regarding the areas and relevant personnel that in principle, must accredit an online course on Personal Data protection. This list is not exhaustive and will be subject to organizational and structural changes implemented at GAM.

Processing Areas	Eligible Areas
Legal and Institutional Relations	All staff reporting to Department and Company Heads
Finance and Strategic Planning	Risk Management Comptroller's Office Shared Services Center Procurement Payment Options and Prevention Legal and Foreign Trade Airport Relations and PMO
Operations and Maintenance	Airports Flight Operations Department Customer Satisfaction Improvement Management AM Cargo
Human Resources	All staff reporting to Department and Company Heads
Digital and Client Experience	All staff reporting to Department and Company Heads
Digital Strategy	Client Contact Centers Loyalty Banks Sales Digital e-Commerce Strategy Ancillaries
Audit	All staff depending on the area

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