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### 1. Purpose

Establish guidelines for classification of Personal Data, in accordance with LFPDPPP provisions and other applicable regulations pertaining to Personal Data protection.

### 2. Scope

Applicable to all personnel part of Grupo Aeroméxico (GAM) involved in Processing Personal Data as part of their duties and responsibilities.

### 3. Effective Date

Effective as of December 30, 2021, and superseding policy POGAM-DP-05 and Procedure PRGAM-DP-05, named for Personal Data Classification.

### 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.

**General Data Protection Regulation (GDPR)**, by the European Parliament and the Council, published on April 27, 2016, which became effective on May 25, 2018.

### 5. Definitions

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

**Privacy Notice or Policy:** A document in physical, electronic, or any other format, generated by the Responsible Party (i.e. GAM), which is made available to the Data Owner, prior to Processing their Personal Data, in accordance with Article 15 of LFPDPPP and Article 13 of Regulations in Legislation No. 29733 known as Privacy Policy.

**Personal Data:** Any information concerning an identified or identifiable natural person. For example: full name, age, telephone number, email, signature, photograph, national ID card, taxpayer number, among others.

**Financial Personal Data:** Information referring to amounts of capital owned by an individual. For example: bank card number, account statement, monthly salary, among others.

**Patrimonial Personal Data:** Any information that evidences possession and ownership of personal assets. For example: possession of cars, goods in the name of data owner, real estate in the name of data owner, among others.

**Sensitive / Special Personal Data:** Personal Data impacting the most intimate realm of the Data Owner, or whose improper use may give rise to discrimination or entail serious risk to the Owner. For example: health status, union membership status, criminal record, religion, sexual preference, among others.

**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 Processor:** The individual or legal person who alone or jointly with others, processes Personal Data on behalf of GAM. Examples include insurance companies, banks, legal and auditing firms, medical and psychological service providers, psychometric and socioeconomic study providers, call center providers, medical laboratories, other airlines, among others.

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


**Remission:** Communication of Personal Data between the Responsible Party and the Responsible Processor, within or beyond Mexican territory.

**Responsible Party:** A private individual or legal entity that decides on Processing of Personal Data, in this case, for GAM's companies.

**Third-Party:** The individual or legal entity, national or foreign, other than the Data Owner or the Data Controller.

Control:  
Compliance:

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**Owner:** The natural person to whom Personal Data belongs.

**Transfer:** Any communication of data to a person other than the Responsible Party or Processor.

**Security Breach:** Loss, destruction, theft, copy, use, access, processing, damage, alteration or unauthorized modification of Personal Data.

## 6. Responsible

The Corporate Privacy Director, in collaboration with Privacy Officers and the Council for Protection of Personal Data (CPPD), is responsible for keeping this policy up to date and encouraging its full compliance.

## 7. Documents

Personal Data Retention, Blocking and Deletion Policy, Personal Data Inventory.

## 8. Restrictions

Not applicable.

## 9. Penalties

Failure to comply with the provisions contained in the policies herein 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 Guidelines

### 10.1 Policy

Grupo Aeroméxico's policy is to preserve Personal Data under its charge and adopt security measures in accordance with the type of data being processed. For such purpose, the company outlines the following policy to define the criteria to be considered in the classification of Personal Data.

### 10.2 Documenting Personal Data Inventories


**Documentation of Personal Data Inventories shall include:**

- Identification and documentation of Personal Data being Processed using the document titled Personal Data Inventory. Support of all processing areas is required to complete the document.
- GAM Processing Areas shall provide reliable information on Personal Data Processing processes through the documentation and submission of a Personal Data Inventory.
- The Personal Data Inventory shall contain details of the life cycle of Personal Data, i.e., steps for collection, use, retention, disclosure, and deletion of Personal Data in the various Processing activities, based on the following aspects:
  - Data from GAM's department or company, through managers responsible for the process and report to said management.
  - Documents, systems, databases, repositories, physical and electronic formats where Personal Data is collected and managed.
  - Data life cycle (collection, use, storage, disclosure and disposal) once obtained, as well as protection (security) measures currently in place.
  - Classification of Personal Data in accordance with criteria established in regulations on personal data protection.
  - Outline of Personal Data involved in this process.
  - Outline of systems involved in Processing Personal Data.
  - Outline of Processors or Third Parties to whom Personal Data is Forwarded or Transferred.
- Safekeeping of Personal Data inventories is as follows:

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Compliance:

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- Every Processing Area at GAM companies shall keep their own inventories of Personal Data, to be documented and updated during defined time periods
- The PO is responsible for safekeeping of a consolidated inventory of Personal Data for all Processing Areas for the GAM company they are appointed to.
- Processing areas (i.e. vice president offices, corporate offices and GAM companies) through their management shall review and notify the PO of updates in Personal Data Inventories in the following cases:
  - Changes in processes involving Personal Data, such as:
    1. Obtaining new Personal Data.
    2. New purposes for Personal Data use.
    3. New Remissions or Transfers of Personal Data.
    4. Cancellation of existing Personal Data.
    5. Sending Personal Data between group companies
  - As a result of conducting annual reviews in Processing Areas, in cases where changes are detected in processes involving Personal Data.
- Processing Areas shall communicate significant process changes to the Personal Data Protection Council (changes are considered major when new Personal Data Processing processes are detected or changes to existing ones involve making changes to the Privacy Notice).
- Processing Areas shall communicate minor process changes to the PO in the inventory so that consolidated data can be updated (changes are minor when they involve changes in information systems or storage media or adjustments in information classification).
- Annually, the DCP shall request updates of the Personal Data Inventory, from Treatment Areas (vice president offices, corporate offices, and GAM companies) to carry out updates and delivery, in the following times:
  - Vice president offices or corporate offices in their capacity as Processing Areas, to send updated Personal Data Inventories to the company PO they belong to, within 15 business days.
  - The PO to review and consolidate information within 15 working days.
  - For purposes of corrections or clarifications in the Personal Data Inventory, the Treatment Area shall address them within 5 business days and return the final inventory version to the PO


### 10.3 Classifying Personal Data

#### Classification of Personal Data shall take place in accordance with the following:

- Criteria for classification of Personal Data shall be established based on what is defined by applicable regulations and considering damages that could happen if Personal Data suffers security breach incidents
- To classify Personal Data contained in Personal Data Inventories the following criteria shall be taken into consideration:
  - **Personal Data:** e-mail, curriculum vitae, zip code, CURP, address, age, schooling, marital status, height, work experience, date of birth, signature, photographs, place of birth, nationality, SMN card number, passport number, IMSS number, full name, name of personal references, Infonavit number, account number, weight, RFC, gender, telephone number, cell phone number, title(s), interbank code.
  - **Financial Personal Data:** income, investments, card numbers, expiration dates, monthly salary, salary range, earned salary range, desired salary range
  - **Patrimonial Personal Data:** car(s) ownership, assets in the name of Data Owner, real estate in the name of Data Owner, properties in the name of Data Owner.
  - **Sensitive / Special Personal Data:** political affiliation, union affiliation, pathological history, criminal record, philosophical beliefs, medications, racial origin, medical conditions,

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psychological conditions, sexual preference, religion, qualifications, certificate of good health, consumption data, family status, disabilities, indigenous language, biometric data.

- Classification of data shall be registered using colors according to each type of data, as follows:
  - Personal Data: green
  - Financial Personal Data: blue
  - Sensitive Personal Data: orange
  - Patrimonial Personal Data: purple

#### **10.4 Protection of Personal Data**

**Administrative, technical, and physical security measures shall be established and maintained to protect Personal Data against Security Breaches.**

- Protection of Personal Data must be performed according to the data's sensitivity, taking the following into consideration:
  - For Personal Data: basic protection
  - For Financial Personal Data: medium to high protection.
  - For Patrimonial Personal Data: high to high protection.
  - For Sensitive Personal Data: high to enhanced protection.

Reference the Policy on Retaining, Blocking, and Deleting personal data to learn more about security controls.