

NOTICE OF PRIVACY PRACTICE

We are committed to the protection of your personal information, and so in accordance with the Federal Act for the Protection of Personal Information in Hands of Private Parties (“Ley Federal de Protección de Datos Personales en Posesión de los Particulares”), we provide you with the following comprehensive privacy notice.

Paradise Village Country Club, S.A. de C.V. (hereafter referred to as “**Paradise Village**”), with legal address on Paseo de los Cocoteros 1, Interior 16-3C, del Fraccionamiento Náutico Turístico Nuevo Vallarta, in the municipality of Bahía de Banderas, in the State of Nayarit, Mexico, C.P. 63735, is responsible for the use and protection of any and all personal information we obtain from you, and in that respect we let you know the following:

Information regarding our Privacy Officer and how to get in contact with him.

Our Privacy Officer is the individual who working for PARADISE VILLAGE who, in compliance with article 30 of the Federal Act for the Protection of Personal Information in Hands of Private Parties, has been designated to:

- Promote the protection of, and safeguard all personal information that we have in our hands.
- Attend to the rights of the individuals to whom the said personal information belongs.

For any inquiries regarding the treatment and protection of your personal information, you may contact our privacy officer by sending an email to the following address: datospersonales@paradisevillagegroup.com.

Purposes for which we will use your personal information.

Your personal information will be used for the following main purposes, which are necessary in order for us to offer you our services:

- **Usual purposes for our different services:** to identify and contact you; provide you with the information you request regarding our products and services; provide you with the services and products you request or contract

with us; issue invoices, receive payment, and issue you with fiscal receipts; allow for your payments with credit or debit cards; compliance with the law; keeping track of requested products or services; use the functionalities of our online digital platforms, in case they exist.

- **Specific purposes regarding our Sunset Market clients:** in case you acquire a prescription drug, to keep a register of the information related to your purchase for reasons of health control in accordance with the applicable law.
- **Specific purposes in the case of leasing or buying one of our properties:** to determine your financial situation; to establish the necessary conditions for the lease or purchase of the said property; to identify your beneficiaries in case of purchase or commercial references in case of lease; to provide the necessary agreements; to prepare your file and maintain a register of your payments both in the case of lease and purchase.
- **Specific purposes regarding our time-share services:** invite you to a presentation of our time-share services, register you at the said presentation, invite the persons mentioned by the member to visit the development; write and execute the purchase agreement for the time-share membership and the commitments you accept as a member; register the member's requirements and identify his necessities and requests; inform the member of the benefits he acquires with the purchase of the membership; if you so desire, register you with the various programs we offer; register you for the use of our facilities; carry out the necessary compensation regarding debts derived from a Trade In.
- **Specific purposes regarding our Sports Clubs and Golf Club members:** execute the membership agreement; to provide protection through a credit card for the loss or damage to property; validate the appropriateness of the applicant for membership; to use the services we provide, both at our Sports Clubs and our Golf Club. In case of being the father, mother, or legal guardian of

minors who wish to use our facilities, obtain their consent so they may use them.

Additionally, your personal information will be used for the following secondary purposes:

- Inform you about our products, services, and or promotions, send you advertising, as well as carry out marketing and commercial prospecting activities.
- Obtain your advice regarding services rendered, in order to evaluate their quality.

If you do not want your personal information to be used for the above mentioned secondary purposes, or any of them in particular, you may deny us your consent as of this moment by sending us your request by email to our privacy officer. Your choice to deny us your consent will not be taken as a motive to stop providing to you our products and services.

Personal information we will request from you for the above-mentioned purposes.

We may request from you the following categories of personal information for the above-mentioned purposes:

- In case of leasing or purchasing one of our properties: personal identification and contact information; as well as work and patrimonial information.
- Regarding our Sunset Market clients: personal identification and contact information; financial information; **sensitive personal information**, consisting in your medical diagnosis, the prescription drugs you take and a case history of your illnesses.
- Regarding our time-share services: personal identification and contact information, as well as your financial information.
- Regarding our Golf Club and Sports Clubs members: personal identification and contact information; as well as work and patrimonial information; **sensitive personal information**, regarding

illnesses, your medical history, and the prescription drugs you take.

Transfer of your personal information.

We inform you that your personal information may be transferred, without the need for your legal consent, to the following individuals and legal entities:

- Usual transfers regarding our different services: to authorities to which we must communicate your personal information as required by the law, with the purpose of complying with the regulation in question; to companies belonging to our group which operate with the same policies and internal procedures for the protection of personal information, with the purpose of offering you a better service and complying with our internal rules and regulations.
- Specific transfers in case of lease or purchase of one of our properties; to the notary public regarding the necessary documents; when appropriate, the transfers determined by sections IV to VII of article 37 of the Federal Act for the Protection of Personal Information in Hands of Private Parties. We will not carry out transfers that require you to grant us your consent.
- Specific transfer regarding our time-share services: to Globimex, S.A. de C.V., to whom we will transfer the rights of the promissory note that you will sign in order to guarantee the financing provided by us, with the purpose of complying with our internal regulations and procedures, and if necessary so that the said company can carry out the appropriate procedures for debt collection; to the company known as Intercambios Internacionales de Vacaciones, S.A. de C.V., in order to register you to the Advantage Program (“Programa Advantage”), in case you have chosen to join it. This company, due to its agreement with Interval International, will transfer your identification information to hotels in other countries so that you

may use your points; to the company BLC Enterprises, Inc., in the case of members who reside abroad, so that the member can design it as his or her agent, in accordance with the terms of the “membership purchase and guarantee agreement”. We will not carry out transfers that require you to grant us your consent for this type of service.

- Transfers regarding the members of our Golf Club and Sports Clubs exclusively: companies with the purpose of making the corresponding charges; when appropriate, the transfers determined by sections IV to VII of article 37 of the Federal Act for the Protection of Personal Information in Hands of Private Parties.

Your rights regarding your personal information.

In accordance with the applicable law in force, you may access, rectify or cancel (eliminate) your personal information, as well as deny its use and revoke the consent which for that purpose you may have granted us, through the procedures we have implemented. In order to know of the said procedures, the requirements and terms, as well as to let us know your comments, complaints or suggestions, we would be grateful if you would send an email to our privacy officer.

Ways in which you may further limit the use and share of your personal information.

In addition to the procedure considered in the section above, you may limit the use or share of your personal information to part related companies, by sending an email to our privacy officer, in which you request your registration on the “Advertising Exclusion List of PARADISE VILLAGE”, in order that that we do NOT use your personal information for promotional, advertising or marketing purposes.

Use of tracking technologies.

We inform you that on our website we use cookies, web beacons, and other technologies through which it is possible to monitor your behavior as an internet user, offer you a better service and user experience while surfing our website, as well as offer you new products and services based on your preferences.

The personal information we obtain through the use of these tracking technologies is the following: your type of navigator and operating system; the time and duration of your surfing on our website, the sections visited; the internet sites visited prior to ours; the following links; the search engine you may have used to access our website; your IP address; the frequency with which you visit our website, or else if it is the first time you do so.

We do NOT share with third parties the personal information that we obtain through the use of these technologies. Likewise, we inform you that you may disable these technologies. To find out how to do so, consult the technical information of the navigator you are using.

In the following links you will find examples of how to do so in these navigators:

- For Internet Explorer: <http://www.microsoft.com/privacystatement/es-es/BingandMSN/default.aspx>
- For Mozilla Firefox: <https://www.mozilla.org/es-MX/privacy/firefox/>
- For Google Chrome: <https://www.google.com.mx/intl/es-419/policies/privacy/>

For Safari: <https://www.apple.com/legal/privacy/es/>

Your personal information is protected.

Your personal information is safeguarded under strict confidentiality, and with the purpose of reasonably preventing the inappropriate use or dissemination of the said information, we have established material, technical and management security measures, in accordance with the applicable law.

Information regarding IFAI.

For further information regarding IFAI, we suggest you visit their official website www.ifai.org.mx.

Modifications to this privacy notice.

PARADISE VILLAGE may modify and/or update this privacy notice, in which case it would let you know directly or personally of any such modifications or updates.

Consent.

I grant my consent for my personal information, including my sensitive personal information, to be treated in accordance with the terms of this privacy notice.

Date of the most recent update: July 2019

Disclaimer

The English translation of this document is provided as courtesy to English-speaking people. In all cases, the Spanish version will be the only document that will be valid for all legal purposes in Mexico. We have attempted to provide the best translation possible, however, due to differences in the legal systems between Mexico (Civil Law) and that of the of the USA or CANADA, among other countries, (Common Law), we will not accept any liability for any conflict due to different interpretations that may arise between the Spanish and English versions. In the event of any dispute in the interpretation hereof, the Spanish version shall always prevail.