

Notice of privacy

CLEVER IDEAS S.A. DE C.V.

In accordance with the provisions of the Federal Law on Protection of Personal Data Held by Private Parties (the "Law"), its Regulations and Guidelines of the Privacy Notice, and in compliance with the obligation of CLEVER IDEAS S.A. DE C.V. Consisting of protecting the Personal Data of the natural persons with whom it establishes a commercial relationship or of any kind, we inform our Clients, Suppliers, Users or those interested in the services of "Clever", the following:

1-CONTENT OF PERSONAL DATA

In accordance with the Law, "Personal Data" is understood to be any information concerning an identified or identifiable natural person. For the purposes of this Privacy Notice, but not limited to, they will be understood as "Personal Data".

1.1. General data

Name (s) and surnames, date of birth, sex, marital status, occupation, spouse's name, home address, tax or main business seat, landline (home or office), cell phone, email, interests, RFC, line of business, financial or property data, billing data, among other data derived from the business relationship.

1.2. Sensitive Personal Data

In addition to your general data, we will occasionally also collect data that is considered sensitive in accordance with applicable legislation.

1.3. Social networks

Social networks (such as Facebook and Twitter, among others) constitute a platform for communication and interconnection between digital platforms of the different users, they are outside "Clever" and, therefore, are not under its responsibility. The information that you provide within social networks in which "Clever" participates as a user does not constitute or form part of the Personal Data subject to the protection of this Privacy Notice, being the responsibility of the company that provides that platform and of whoever publishes it.

The Personal Data mentioned in sections 1.1. and 1.2. of this Privacy Notice will be collected through various formats and / or through the collection of information or documentation required by "Clever", either personally, by telephone, by optical means or by any other technology, as well as electronically in the Internet page of present or future "Clever" ("Internet Page of" Clever ""), among which the following stands out: www.cleverideas.com.mx.

1.4. Cookies

Cookies are text files that are automatically downloaded and stored on a hard drive of the user's computer equipment when browsing a certain Internet page and that allow the Internet server to remember some user data. Through this Privacy Notice we inform you that it is possible that we use cookies to identify when a user returns to the Internet page in order to provide a better browsing experience. Our cookies do not contain any personally identifiable information.

2-PERSON RESPONSIBLE FOR COLLECTING PERSONAL DATAS

The legal person responsible for collecting your Personal Data in this act, as well as in past and / or future acts, is the legal entity called CLEVER IDEAS S.A. de C.V. ("Clever") with address at Pegaso # 3692, INT. 201. Suburb La Calma, Zapopan, Jalisco. C.P. 45070.

3-PROCESSING OF PERSONAL DATA

In accordance with the provisions of the Law, the processing of Personal Data ("Personal Data Processing") is the obtaining, use, disclosure or storage of Personal Data, by any means. The use includes any action of access, handling, use, transfer or disposition of Personal Data. The Processing of Personal Data by "Clever" will be limited to the fulfillment of the Processing Purposes set forth in this Privacy Notice. In the event that it is necessary to process your Personal Data for a purpose other than the purposes indicated in this Privacy Notice, "Clever" will again request your consent for this purpose.

4-PURPOSES OF PERSONAL DATA

Through this Privacy Notice, "Clever" declares that the purposes of processing your Personal Data will be the following ("Processing Purposes"):

- a) Commercial purposes
- b) Marketing, advertising or commercial prospecting
- c) Quality of service
- d) Evaluation of the Services and / or products that it provides and, where appropriate, for the subscription of the contracts of the products and / or services that it provides.

5-ACCEPTANCE

5.1. Acceptance in a personal way

When Personal Data is obtained personally from the owner, "Clever" will make this Privacy Notice available to you at the time your Personal Data is collected and in a clear and reliable way, through the formats that Clever "uses or I will use it for that purpose. In addition, through these formats, "Clever" will seek the acceptance or denial of the owner's consent to submit said data to the Treatment Purposes established in this Privacy Notice.

5.2. Tacit acceptance

If you do not express opposition to the content and scope of this Privacy Notice or its modifications, it will be understood that you grant your tacit consent for "Clever" to process your Personal Data based on the Treatment Purposes established in the Notice of Privacy.

6-LIMITATION OF THE USE OR DISCLOSURE OF PERSONAL DATA

6.1. Actions to prevent unauthorized use or disclosure

In order to guarantee the protection of Personal Data and limit their unauthorized use or disclosure, "Clever" continually performs and will carry out the following actions:

- a) Confidentiality of information. "Clever" will keep confidentiality regarding the Personal Data collected, which will continue even after the end of commercial or other relationships with the Client or supplier, in its capacity as Owner of said Personal Data.
- b) Confidentiality notice. In the event that, for any reason, "Clever" finds it necessary to provide your Personal Data to third parties (under the terms provided in the Law or in this Privacy Notice), it will notify said third parties of the obligation to comply with the provisions of the Law and the confidentiality of your Personal Data.
- c) Database administration. Personal Data is managed and protected through the use of databases ("Database"), which are administered only by the persons designated by "Clever" for this purpose, without allowing their use, consultation, management or access to unauthorized persons.
- d) Computer and computer systems. Our Databases are protected by firewalls and computer and / or computer systems focused on preventing and preventing unauthorized persons outside "Clever" from accessing your Personal Data.

6.2. Requests to Limit Use or Disclosure

In case you wish to limit the use or disclosure of your Personal Data, in relation to one or more of the Purposes of the Processing of Personal Data, you can send the respective request in accordance with the procedure established in section 8 of this Privacy Notice, or through access to the links that are uploaded or will be uploaded on the "Clever" internet pages.

7-TRANSFER OF PERSONAL DATA

In the event that "Clever" transfers your Personal Data to any of its suppliers, clients and / or collaborators in order to carry out the Treatment Purposes established in this Privacy Notice, it will do so after entering into agreements with confidentiality and, as long as

- (i) The person to whom they are transmitted agrees to submit the processing of Personal Data to this Privacy Notice, and
- (ii) it is not one of the assumptions established in article 37 of the Law.

8-RIGHTS OF ACCESS, RECTIFICATION AND OPPOSITION

In accordance with the provisions of the Law, you have the right to access, rectification, cancellation or opposition to the Processing of your Personal Data, for which "Clever" offers you the following procedure.

8.1. Legal department "Clever" has designated the Legal Department the custody of Personal Data, which will process your requests and promote the protection of Personal Data within "Clever". For the above, the Legal Department makes the following forms available to you contact and receipt of information and related documentation:

- Email: info@cleverideas.com.mx
- Address: Pegaso # 3692, INT. 201. Suburb La Calma, Zapopan, Jalisco. C.P. 45070.

8.2. Request for access, rectification, cancellation or opposition

As Personal Data Holder, you may submit or send to the Legal Department a request for access, rectification, cancellation or opposition, regarding your Personal Data. Said request must contain, at least:

- Full name and address of the owner of the Personal Data, or other means to communicate the response to your request.
- Documents that prove the identity or legal representation of the owner of the personal data.
- Clear and precise description of the Personal Data with respect to which one seeks to exercise any of the aforementioned rights.
- Any other element or document that facilitates the location of the Personal Data.
- Indicate the modifications to be made and / or the limitations on the use of Personal Data, in accordance with the provisions of section 6.2. of this Privacy Notice.
- Provide the documentation that supports your request.

8.3. Resolution and communication

"Clever" will notify the owner of the Personal Data of the decision made within a period of no more than 20 business days from the date the request was received. This period may be extended by "Clever" on a single occasion for an equal period, as long as the circumstances of the case justify it.

Based on the foregoing, and in accordance with the provisions of the Law, "Clever" will inform the owner of the Personal Data the meaning and motivation of the resolution, by the same means by which the request was made, and will accompany said resolution of the relevant evidence, if applicable.

When the request is appropriate, it will be made effective by "Clever" within 15 business days following the communication of the resolution adopted.

The owner may submit to the Federal Institute for Access to Information and Data Protection (IFAI) a request for data protection for the response received or lack of response from "ho1a". Said request must be submitted by the owner within 15 business days following the date on which the response to the owner is communicated by "Clever", and will be subject to the provisions of the Law.

In the case of requests for access to Personal Data, it will be necessary for the applicant or their legal representative to previously prove their identity. The obligation to access the information will be deemed fulfilled when "Clever" makes the Personal Data available to the owner or by issuing simple copies or electronic documents. In the event that a person requests "Clever" access to their Personal Data presuming that he is responsible and it turns out that he is not, it will be enough for "Clever" to indicate this to the applicant by any means (of those established in this section), to have the request as clear.

The response to your request for access, rectification, cancellation or opposition of Personal Data will be free. It should only cover the justified shipping costs or the cost of reproduction in copies or other formats, which, in due course, will let you know "Clever".

In the event that the same owner reiterates the request for access, rectification, cancellation or opposition of Personal Data in a period of less than 12 months from the date of the last request, the answer to your request may have an additional cost of in accordance with the provisions of article 35 of the Law.8.4. Negativa para acceder a Datos Personales "Clever" may deny total or partial access to Personal Data or to carry out the rectification, cancellation or opposition to their treatment, in the following cases:

- Cuando el solicitante no sea el titular o el representante legal no esté acreditado para ello. Cuando en la Base de Datos de "Clever" no se encuentren los Datos Personales del solicitante.
- When the rights of a third party are injured.
- When there is a legal impediment or resolution of an authority.
- When the rectification, cancellation or opposition has been previously made, so that the request lacks subject matter.

8.5. Consequences of cancellation

The cancellation of Personal Data will give rise to a blocking period after which "Clever" will proceed to delete the corresponding data. Once the corresponding Personal Data has been canceled, "Clever" will notify its owner. Once this has been done, "Clever" may keep the Personal Data exclusively for the purposes of the responsibilities derived from the treatment referred to in the Privacy Notice.

When the Personal Data has been transmitted to third parties before rectification or cancellation and is processed by said third parties, "Clever" must inform them of the request presented by the owner, so that they can proceed to carry out such rectifications or cancellations.

"Clever" will not be obliged to cancel your Personal Data in the cases established in article 26 of the Law. Likewise, when the information collected in the Personal Data is no longer necessary for the fulfillment of the purposes set forth in this Privacy Notice and in the applicable legal provisions, your Personal Data will be canceled from the "Clever" Databases.

9-CHANGES TO THE PRIVACY NOTICE

"Clever" reserves the right to make, at any time, modifications or updates to this Privacy Notice, for the attention of legislative or jurisprudential developments, internal policies, new requirements for the provision or offering of its products and services, or for business practices.

Therefore, in the event that "Clever" modifies the content of this Privacy Notice, it will inform you through any of the forms and means through which the content of this notice is made known to you.

This Privacy Notice was last updated on July 11, 2016. Final considerations - Informative nature of this document. The content of this Privacy Notice is for informational purposes only, so if you wish to express your acceptance or rejection of its content, we invite you to send the corresponding request to the Legal Department of "Clever" through the channels indicated in section 8.1 of this notice.

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