

SHELL MÉXICO

PRIVACY NOTICE FOR EMPLOYEES

PRIVACY NOTICE FOR EMPLOYEES

1. Identity of the Data Controller

Shell México, S.A. de C.V. and its affiliated and subsidiary companies (hereinafter the “**Data Controller**”), with address at Av. 2 de Octubre 711, Zona Industrial, San Pedro Garza García, Nuevo León, Mexico, C.P. 64650, establishes the terms applicable to the processing of personal data in compliance with the Federal Law on the Protection of Personal Data Held by Private Parties (LFPDPPP), and observes the principles of data protection, including maintaining information that is pertinent, correct, up-to-date, accurate, and complete

2. Personal data subject to processing

To carry out the purposes described in this Privacy Notice, the Data Controller will collect the following personal data:

- Identification data
- Employment data
- Academic data
- Authentication data
- Image data
- Health data (classified as sensitive)
- Geolocation data
- Electronic data
- Financial or patrimonial data
- Data related to administrative or judicial proceedings
- Biometric data

The Data Controller does not directly collect personal data from minors. Accordingly, the Data Controller will only process personal data of minors provided by their parents and/or legal guardians exclusively for purposes related to the employment relationship between you and the Data Controller, including, where applicable, the administration of employment benefits. Parents and/or guardians may exercise ARCO Rights on behalf of their children or dependents at any time, or revoke consent for the processing of the personal data they previously provided to the Data Controller, to the extent permitted by applicable law.

When processing involves sensitive personal data (e.g., health information for medical leave, fitness or toxicology exams, or biometric data), the express consent of the employee will be obtained in advance through the appropriate forms or channels, applying reinforced security measures and restricted access, with retention periods consistent with the purpose and applicable regulations.

3. Purposes of the Processing

Primary Purposes (do not require consent)

A. Employment Administration and Personnel File

- Registering and deregistering employees; preparing employment contracts and employment certificates.
- Creating and maintaining the personnel file; making updates upon changes in employment conditions.
- Monitoring attendance and incidents; administering internal promotions and salary changes; evaluating performance and conducting mandatory training assessments.
- Conducting internal audits; managing labor claims and responding to requests from authorities.
- Complying with legal obligations under labor law and other applicable federal, local, or official regulations.

B. Payroll and Benefits

- Paying salaries and benefits; managing payroll receipts and travel expense reimbursements.
- Managing and controlling savings funds (if applicable).
- Managing social security affiliations (IMSS/INFONAVIT or others); arranging life insurance and medical insurance.
- Assigning fixed assets, corporate uniforms, and institutional email accounts.

SHELL MÉXICO PRIVACY NOTICE FOR EMPLOYEES

C. Training and Development

- Providing and coordinating internal and external training required for the position; evaluating training results.
- Conducting integration activities and workshops related to safety, compliance, or risk prevention (if mandatory).

D. Safety and Hygiene

- Monitoring attendance and incidents.
- Controlling access to corporate and operational facilities (physical access cards and vehicle access).
- Providing security through CCTV surveillance in accordance with the specific notice posted in monitored areas.
- Complying with occupational health and safety standards and governmental health guidelines.
- Providing medical assistance or guidance in health contingencies arising from the workplace and collaborating with competent authorities.

E. Investigations and Operational Continuity

- Investigating merchandise losses and incidents related to operational integrity.
- Investigating voluntary resignations for process closure and operational continuity purposes.

Secondary Purposes

- Use of image in internal and external communications.
- Offering non-mandatory benefits.
- Inviting employees to recreational, cultural, and sports events not essential to the employment relationship.

Secondary purposes are not necessary for the employment relationship; therefore, your consent is required. Refusing consent does not affect your employment conditions. You may withdraw consent or opt out at any time through the channels described in the ARCO Rights and Revocation section.

4. Source of Obtaining Personal Data

The Data Controller obtains the data subject's personal information directly, whether during the recruitment, selection, and onboarding process, or throughout the employment relationship, through means such as the submission of documentation, interviews, assessments, internal forms, and any other mechanism through which the employee provides their information.

5. Transfer of Personal Data

The Data Controller may carry out national and international data transfers necessary for the purposes described. Transfers to (i) companies within the same corporate group operating under common processes and policies; (ii) competent authorities; (iii) insurance companies and benefit providers; (iv) third parties with whom there is a legal relationship linked to the employment relationship; and (v) processors acting on behalf of the Data Controller (e.g., medical service providers, psychometric evaluation providers, and information technology services) will be carried out in accordance with the legal provisions that do not require the data subject's consent.

In all cases, only the necessary and proportional information will be transferred, adopting contractual, administrative, technical, and physical measures to safeguard confidentiality, integrity, and availability.

When transfers do not fall under a legal exemption, the Data Controller will provide the data subject with a clause allowing acceptance or refusal of the transfer of personal data, in accordance with Article 35 of the current LFPDPPP. For such cases, the Data Controller will implement clear, free mechanisms to obtain acceptance or refusal prior to performing the transfer.

6. Limitation of Use or Disclosure of Data

For employees, primary purposes are not subject to limitation, as they are based on the Data Controller's legal, contractual, or administrative obligations. For secondary purposes, you may request at any time the limitation of the use or disclosure of your personal data by submitting a written request to the Regulatory Compliance Area addressed to the Data Privacy Officer at privacidad-datos@iconn.com.mx, specifying the scope of the limitation you wish to establish and attaching a copy of valid official identification, with the original presented when delivering the written request.

SHELL MÉXICO PRIVACY NOTICE FOR EMPLOYEES

Your request will be reviewed by the Data Privacy Officer; if no legal exception applies and no legal provision requires the Data Controller to continue processing your personal data, your request will be granted and the decision will be communicated within 10 business days.

7. Rights of Access, Rectification, Cancellation, and Opposition (ARCO)

The data subject or his/her legal representative may exercise ARCO Rights by submitting a request to the email privacidad-datos@iconn.com.mx, or by delivering it in person at Av. 2 de Octubre 711, Zona Industrial, San Pedro Garza García, Nuevo León, Mexico, C.P. 64650, Monday through Friday from 10:00 a.m. to 1:00 p.m.

The request must contain at least the following information:

- Full name of the data subject
- Preferred means to receive the response (email, telephone, or address)
- The right to be exercised (one per request)
- A copy of valid official identification; if a representative acts on behalf of the data subject, documentation proving representation
- If applicable, documents supporting the requested rectification or update
- Information that facilitates the location of the personal data

If additional information is required, the Data Controller will contact the data subject within 5 business days following receipt of the request. The data subject will have 10 business days to respond to the request for additional information.

The Data Controller will issue a resolution within 20 business days from receipt of the request or from the date the additional information was provided, and, if applicable, will enforce the granted right within 15 business days thereafter. The response will be provided through the same means used by the data subject unless another method is indicated.

For general questions about this Privacy Notice or ARCO Rights—including the right to object to automated processing—the data subject may write to privacidad-datos@iconn.com.mx using the subject line “ARCO Rights Information”.

8. Changes to this Privacy Notice

The Data Controller may modify or update this Privacy Notice when there are changes in applicable legal requirements, internal processes, new data processing purposes, or when additional personal data is collected.

Any modification will be published and made available to data subjects through the same means used for the original notice, and, where applicable, on the website where this document is hosted.

The current version of this Privacy Notice will remain continuously available for consultation.

9. Retention, Blocking, and Deletion of Personal Data

Personal data will be retained only for the time necessary to fulfill the purposes described in this Privacy Notice, during the commercial relationship, and for any additional periods established by applicable legal provisions. During this time, the Data Controller will seek to maintain accurate and complete information in accordance with the quality standards established by current legislation.

When the data is no longer necessary, it will be subject to a blocking period, during which it may not be processed and will be retained solely to determine potential liabilities until the applicable statutes of limitations expire.

Once that period has ended, the data will be permanently and securely deleted, in accordance with applicable regulations and the Data Controller’s internal policies.

10. Competent Authority

If, after exercising your rights with the Data Controller, you believe that the Federal Law on the Protection of Personal Data Held by Private Parties has been violated, you may file a complaint with the Secretariat of Anti-Corruption and Good Governance, the competent authority in matters of personal data protection.

Last updated: June 1, 2026