COMPREHENSIVE PRIVACY NOTICE FOREIGN STUDENTS

UDEM, **responsible for the processing of personal data** of foreign students, offers this comprehensive privacy notice which has been developed according to the Ley Federal de Protección de Datos Personales en Posesión de los Particulares (Federal Protection of Personal Data in the Hands of Private Individuals Act) and its secondary regulation.

UDEM

IDENTIFICATION OF THE PERSON RESPONSIBLE

Universidad de Monterrey, UDEM, Private Education Institution with the following address, Avenida Ignacio Morones Prieto, Number 45000 West, 4th Floor, Colonia Jesús M. Garza, Municipio San Pedro Garza García, Nuevo León, ZIP code 66238, México, website: <u>www.udem.edu.mx</u>, email address <u>datospersonales@udem.edu</u>, telephone number (81) 8215-1000 ext. 2000 with business hours from Monday to Thursday from 10:00 to 13:00 h.

PEOPLE TO WHOM WE ADDRESS THIS PRIVACY NOTICE

The complete version of this privacy notice is aimed to our foreign students (and their mother, father, or tutor).

PERSONAL DATA

LIST OF PERSONAL DATA SUBJECT TO TREATMENT

In the UDEM, we perform the treatment of several personal data categories. For better understanding, below we detail which categories and specific personal data are under our treatment:

Category	Personal data		
Identification data	 Home address Age Date of birth Photo Gender Place of birth Nationality Full name Passport number ⁽¹⁾ Insurance policy number 		
Contact data	 UDEM email adress Personal email adress Personal telephone number 		
Academic data	 School of origin: name, country, city, state, start date, start and end of school grade and type of institution. Degree Language (written, spoken and read) Equivalent school subjects in UDEM (keyword, name and credits) Academic number Academic performance 		
Transit data	Accommodation and transport		
Biometric data	Autograph signature		
Financial data of third parties	 Complete name, bank account number and CLABE number (refunds) Number, expiration date and CVV of the bank card. 		
Third party identification and contact data	 Complete name and phone number of the student's doctor. Complete name, citizenship, home address, telephone and autograph signature of the father, mother, or tutor. Complete name, citizenship, home address, telephone and autograph signature of the father. Complete name, citizenship, home address, telephone and autograph signature of the father. Complete name, citizenship, home address, telephone and autograph signature of the father. Complete name, citizenship, home address, telephone and autograph signature of the father. Complete name, citizenship, home address, and email address of the responsible in the school of origin. Complete name, RFC, address, and email address of the person requesting tax vouchers. 		

⁽¹⁾ Manage study trips or extracurricular activities

SENSITIVE PERSONAL DATA

We inform you that we collect and perform treatment of sensitive personal data of our **foreign students**. The sensitive personal data subject to treatment are listed below.

Category	Personal data		
Ideological data	Religion		
Health data	 Serious accidents Allergies ⁽¹⁾ Pathological history ⁽²⁾ Major surgeries Consumption data for harmful substances ⁽⁴⁾ Diseases ^{(1) (3)} Chronic diseases Capillary glucometry ⁽²⁾ Degree of alcohol ⁽⁴⁾ Medical incidents that limit the participation of training programs ⁽¹⁾ 	 Medicines and frequency ^{(1) (2)} Suffering of Depression or anxiety Blood pressure ⁽²⁾ Food restrictions ⁽¹⁾ Results of doping tests ⁽⁴⁾ Laboratory results ⁽³⁾ Vital signs ⁽²⁾ Suspicion or confirmation of pregnancy ⁽¹⁾ Blood type ⁽¹⁾ 	
Physical characteristic data	Body mass ⁽²⁾	Weight ^{(1) (2)}	
Physical characteristic data Personal characteristics data	 Body mass ⁽²⁾ Phobias ⁽¹⁾ 	 Weight (1) (2) Size ⁽²⁾ 	

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- ⁽¹⁾ Manage study trips or extracurricular activities
- ⁽²⁾ Evaluate the health status to identify risks problems in the student
- (3) Justify non-attendance to classes
- (4) Prevent the consumption of harmful substances

In case of change, we will inform you such modification to our privacy notice.

HOW DO WE OBTAIN YOUR PERSONAL DATA?

- i. Directly from you:
 - By email
 - Through our corporate formats
 - By phone
 - By our official social media (facebook, twitter, linkedin, instagram, youtube and google+)
- ii. In person:
 - When you arrive to our facilities and we ask you to fill our corporate format

PERSONAL DATA TREATMENT PURPOSES

The purposes are those that motivate the treatment of your personal data, for your understanding and by law provision are classified in primary and secondary purposes.

PRIMARY PURPOSES

The primary purpose is the one that needs to be realized for the development of a legal obligation or the main reason why there is a relationship between the Owner (you) and the Responsible (us), if you object to any of these purposes, the UDEM will be prevented from providing the specific services that relates with the purpose for which it opposes.

Category	Purpose
Academic	 Analyze cases and impose sanctions for academic failure and/or discipline Provide academic attention, follow-up and advice Provide vocational and professional guidance Manage and take attendance of workshops, courses, trainings and/or conferences Identify and follow-up on student misconduct Identify and verify the academic performance of the student Provide academic advisories and tutorials Make evaluations and academic tests
Customer service	 Coordinate appointments in order to provide information about our services Follow up on complains and suggestions of our services
Contracting of services	Elaborate and update legal instruments
Health evaluation	 Issue it to the CETIA (Centro de Tratamiento e Investigación de la Ansiedad) (Center for Anxiety Treatment and Research) in case it is necessary Monitor the risk cases of the student Evaluate the health status in order to identify risks or problems with the student Prevent the use of harmful substances Provide psychologic treatment (in case of requesting the service or being referred) Being in touch with the students specialist in order to provide comprehensive care and coordinated support for the welfare of the student (in the event of treatment or referral to a mental health specialist)
Billing and collection	 Issue and send tax vouchers Identify and make clarifications on payments Charge of services Return of charge of services Pay the tuition fee and/or services through our payment portal

- Through our messaging applications (whatsapp and hangouts)
- By our institutional platforms
- By our mobile apps
- By our official website: www.udem.edu.mx

COMPREHENSIVE PRIVACY NOTICE FOREIGN STUDENTS

Category	Purpose		
Service provision (administrative procedures)	 Update personal information Assign an institutional email account Provide attention, investigation and follow up to cases arising from internal complaints Discharge the intern file and keep it updated Manage the registration on our internal platforms and mobile applications Manage the parking service (in case of requesting this service) Manage the transfer by ambulance to medical and hospital services (in case of request) Manage the awards and institutional recognitions Provide the transportation service "Directo UDEM" (in case of request) Provide a smart card as the means of identification within the campus of the UDEM Perform the verification of the affiliation to the IMSS or medical expenses insurance in order to ensure that the student has medical coverage Lend library material 		
Service provision (school procedures)	 Lend horary material Share with the father, mother or tutor academic information, health-care and discipline. Make Diplomas, certificates, letters, or any other academic document Manage cultural activities and institutional events Manage the academic and administrative process of the student enrollment into the academic program Manage equivalence or revalidation of studies Manage academic movements Manage apostille procedures for academic documents (foreign students) Manage study trips or extracurricular activities Justify class absences Register and carry out extracurricular activities of your interest Reserve our services and resources Request for authorizations for study trips or extracurricular activities Validate academic documents 		
Security	 Provide access to our facilities Maintain security within our facilities Provide security through our closed-circuit video surveillance (for which we invite you to consult the privacy not displayed on the video surveillance areas) Make internal investigations about security incidents Register the student entry and exit of the facility Report and follow up the lost objects 		
Technical support	Provide technical support to our institutional platforms and mobile applications		

SECONDARY PURPOSES

The secondary purpose is not essential for the development of a legal relationship between the Owner (you) and the Responsible (us), you may indicate if you do not authorize your personal data treatment in any or all of the following:

Category	Purpose		
Extraordinary benefits	Send promotions and discounts of our services		
Surveys	 Apply satisfaction surveys of our services and academic programs Make research studies Make conduct opinion polls about scholar necessities and our services 		
Marketing	 Make statistics Send invitations for events and/or institutional activities Send publicity of our services Obtain photographs for use of the UDEM's image, advertising and marketing purposes Make testimonial recordings about charitable scholarships, of school trips and/or activities 		

MECHANISM FOR EXPRESSING NON-ACCEPTANCE TO THE SECONDARY PURPOSES

In any moment, you must make use of the exercise of your Right of Objection establish in the section "Rights of Access, Rectification, Cancellation and Opposition (ARCO Rights)."

TRANSFERS OF PERSONAL DATA

We inform you that we make national transfer of your personal data to Banco Santander (México), Sociedad Anónima, Institución de Banca Múltiple, Grupo Financiero Santander in order to issue and customize the smart card service that is provided to the student as means of identification within the campus UDEM, being an option to UDEM's community to activate the financial application of the smart card.

The only transfers of personal data are: complete name, date of birth and UDEM's identification number.

RIGHTS OF ACCESS, RECTIFICATION, CANCELATION AND OPPOSITION (ARCO)

WHAT ARE THE ARCO RIGHTS?

ARCO rights are the legal mechanism that allow you to exercise you access, rectification, cancelation and opposition rights which consists on:

- Access to personal data, exclusively to your own, unless you are a legal representative or tutor from another owner, and they are under our treatment
- Request the corrections or updates of your personal data
- Request that we eliminate your personal data, when legally appropriate
- Opposing to the primary purposes stablished in this privacy note assumption under which we will be unable to perform the provision of specific services that relates with the purpose for which it is opposed
- Request your opposition to the realization of the indicated secondary purposes (if any)
- Request that your personal data not be transferred to third parties

MEANS FOR EXERCISING THE ARCO RIGHTS

For you to exercise any of your ARCO rights, you should do so personally following the procedure that is indicated in the section "Procedure to exercise the ARCO rights" of this privacy notice.

PROCEDURE TO EXERCISE THE ARCO RIGHTS

The owner of the personal data should present a free writing in Avenida Ignacio Morones Prieto, Number 45000 West, 4th Floor, Colonia Jesús M. Garza, Municipio San Pedro Garza García, Nuevo León, ZIP code 66238, México with business hours from Monday to Thursday from 10:00 to 13:00 h or send it by email to de address <u>datospersonales@udem.edu</u>, your free writing should be address to the Personal Data Office of the Monterrey University and include as a minimum the following data:

- Complete name of the personal data owner
 - Ways to contact you and communicate the answer, it could be any of the following
 - Address to receive SEPOMEX packaging.
 - Personal phone number
 - Personal mobile number
 - Email address
- Clear of the full mention of the right you seek to exercise, pointing one at a time.
- Original valid official identification and a copy for collection. If your request is sent by email, you should attach the scanned identification with photo, complete name, ID number and signature.
- In case you are not the owner of the personal data, you should attach the document that certifies you as the legal representative (Power of attorney before public federalist or birth certificate represented by the father, mother or tutor in case of underage)
 - In case of requesting changes arising from updates or variations, you should present the legal document proving this circumstance
- Additional precise information that facilities the search for personal data, indicating -as far as possible- those who have provided us and/or the periods in which they were provided
- Autograph signature which shall coincide with the official ID you present to perform the procedure

Within a period of no longer than 5 working days after receiving the request, in case of doubt or requirement of more information about your request, we will contact you in order to communicate such situation and get more information from you regarding the request. The answer to our request should not exceed 10 working days.

In a period of no longer than 20 working days after receiving the request, or after having responded the clarifications requested by us, we will contact you in order to communicate the answer of such request, the answer will be handed personally in our address, upon accreditation of the owner or his representative, or in each case by the email provided in the original application.

For further information about this privacy notice or any other doubt on how to exercise your Access, Rectification, Cancelation and Opposition Rights (ARCO), limit their use or revoke your consent, you should send an email to: <u>datospersonales@udem.edu</u> with the subject "ARCO Rights information" or call the telephone number (81) 8215-2000 on the days and times previously mentioned.

CONSENT

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We inform you that we collect and treat the sensible personal data of our foreign students, so it is necessary that both the student and his mother, father, or tutor express consent in this document. Additionally, we inform you that we do personal data national transfers as outlined in the section "Transfers of personal data" in this privacy notice, it is necessary that you express your consent in this document. Unless you exercise one of your rights of Access, Rectification, Cancelation or Opposition (ARCO), limit the use or revoke the consent to the treatment or transfer of your personal data, we consider that you accept the provisions in this privacy notice.

MECHANISM TO REVOKE CONSENT GRANTED FOR THE TREATMENT OF YOUR PERSONAL DATA

In case you want to revoke consent granted on your personal data treatment, you should start with the same procedure established on the section "Rights of Access, Rectification, Cancelation and Opposition (ARCO)". Your request will be subject to review by our office of personal data, in the event that an exception to the law is not complied or there is no legal provision that subjects us to perform the processing of your personal data, your request will be appropriate, and we will communicate the decision in a term of 10 working days.



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LIMITATION FOR USE AND DISCLOSURE OF PERSONAL DATA

FOR THE EXCLUSIVE USE WITH THE UDEM

For the case of our foreign students, at any moment you have the option of limit the use and disclosure of personal data presenting a free writing in the address given previously and directed to our Personal Data Office pointing in the request the extent of the limitation to the use or disclosure you wish to establish, accompanied with a simple copy of your official ID presenting the original at the moment you submit your writing. Your request will be reviewed by our Personal Data Office in the event that an exception to the law is not complied or there is no legal provision that subjects us to perform the processing of your personal data, your request will be appropriate, and we will communicate the decision in a term of 10 working days.

FOR TRADE TOPICS

Visit the website of the Procuraduria Federal del Consumidor where it is at your disposal the Registro Publico de Consumidores (Public Register of Consumers) (RPC) provided by the Ley Federal de Protección al Consumidor (Federal Consumer Protection Act), where you will decide the use of your personal data at the commercial, touristic and the telecommunication sectors.

FOR FINANCIAL TOPICS

Visit the website of the Comision Nacional para la Protección y Defensa de los Usuarios de Servicios Financieros (National Commission for the Protection and Defense of Users of Financial Services) where it is at your disposal the Registro Publico de Usuarios (Public Register of Users) (REUS) provided by the Ley de Protección y Defensa al Usuario de Servicios Financieros(Financial Services User Protection and Defense Act), where you will decide the use of your personal data in the financial sector.

COMPETENT AUTHORITY

Having exercise your rights of Access, Rectification, Cancelation or Opposition; Limit the use or disclosure of your personal data, or have revoked your consent of your personal, if you considered that we have make an omission or any violating action with the Ley Federal de Protección de Datos Personales en Posesión de los Particulares (Federal Protection of Personal Data in the Hands of Private Individuals Act), we inform you that the competent Mexican authority to which you may submit your resignation or dissatisfaction is the Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (National Institute for Transparency, Access to information and Protection of Personal Data) (INAI).

USE OF COOKIES, WEB BEACONS AND OTHER SIMILAR TECHNOLOGIES

In our website <u>www.udem.edu.mx</u>, we collect cookies and web beacons. This information allows us to know; ads you visit on our site (anonymously), IP address from which you visit us (anonymously), date and time of the visit (anonymously), browser information: program and version (anonymously), information you exchange with our website (anonymously), visited pages (anonymously) and in general, your location and your activity inside our website, in order to optimize the research of your favorite services inside our official website.

To oppose that we collect these data about your visit, we recommend consulting the privacy configuration guides of the browser you use.

To know the personal information that we collect through our mobile apps it is necessary that you consult the privacy notice published in each of them. To oppose the access to your information of our mobile apps we recommend consulting the privacy guides of your mobile device.

UPDATES

This privacy notice will be updated in the future resulting from amendments to the legal framework in the matter of personal data protection, changes in UDEM's business model, new collection of personal data and/or changes on the purposes. The updates and modifications to this privacy notice will be of your knowledge through an email account that you provide as means of communication in the admission process and through our official website: www.udem.edu.mx in the section for foreign students. Last updated: April 27, 2020.

CONSENT

	Student	authority, father, mother or tutor
I grant my consent for the processing of my personal data in favor of UDEM	Full name Date Signature	Full name Date Signature
I grant my consent for the processing of my personal data to Banco	Student	Person exercising parental authority, father, mother or tutor
Santander (México), Sociedad Anónima, Institución de Banca Múltiple, Grupo Financiero Santander in order to emit and personalize the smart card as a means of identification inside UDEM's campus.	Full name Date Signature	Full name Date Signature