

PRIVACY NOTICE

I. Identity of the Data Controller

In compliance with the Federal Law on Protection of Personal Data Held by Private Parties (Ley Federal de Protección de Datos Personales en Posesión de los Particulares, "LFPDPPP"), its Regulations and the Privacy Notice Guidelines, and insofar as applicable, Regulation (EU) 2016/679 ("GDPR"), Rutopía Turismo Biocultural, S.A.P.I. de C.V. ("Rutopía" or the "Controller") makes this Privacy Notice available to you.

Company name: Rutopía Turismo Biocultural, S.A.P.I. de C.V.

RFC: RTB190503F13

Registered address: Av. Francisco Sosa No. 29, Floor 2, Col. del Carmen, Alcaldía Coyoacán, C.P. 04100, Mexico City.

Privacy email: viaja@rutopia.com

General email: viaja@rutopia.com

Website: www.rutopia.com

This Privacy Notice applies to the processing of personal data of all natural persons who interact with Rutopía in the context of its activity as a tourism intermediary, including travelers, commercial partners, local tour operators, and service providers.

II. Categories of Data Subjects and Personal Data Collected

2.1 Travelers

These are natural persons who contract or request Travel Packages from Rutopía, directly or through a Sales Channel. Rutopía collects the following data from them:

Identification and travel: Full name, passport number and expiry date, country of issue, date of birth, nationality, country of habitual residence.

Contact: Email address, mobile phone number (including WhatsApp or other messaging platform accounts), postal address.

Booking and payment: Destination, dates, number of travelers, contracted services, booking history, records of communications with Travel Specialists, payment information (excluding full bank card numbers).

Sensitive data (*): Dietary preferences when they reveal health conditions (allergies, intolerances, diabetes, or others) or religious beliefs (kosher, halal, religiously motivated vegetarianism, etc.). See Section 3.

(*) Data marked as sensitive requires your explicit and separate consent before being collected.

See Section 3 for the applicable procedure.

2.2 Commercial Partners and Local Operators

These are natural or legal persons who provide tourism operation services through Rutopía or who maintain a commercial relationship with Rutopía as Sales Channels. The following data are collected from their representatives and contacts:

- Full name and position of the main contact person.
- Corporate email address and phone number.
- RFC and fiscal identification data of the legal entity.
- Registered business address.
- Banking data for transfer of fees (CLABE, bank account, SWIFT/IBAN, as applicable).
- Information on current tourism registrations, licenses, and certifications.

2.3 Service Providers

These are accommodation establishments, restaurants, guides, and other local providers included in the travel packages. Identification and contact data, as well as data necessary for the operational coordination of services, are collected from their representatives.

2.4 Data We Do Not Collect

Rutopía does not request or store full credit or debit card numbers, banking passwords, biometric data, or information on the racial or ethnic origin of data subjects, except for the sensitive data expressly referred to in Section 3. Any card payment is processed directly through PCI-DSS certified payment processors that operate under their own security standards.

III. Processing of Sensitive Personal Data

Rutopía collects dietary preferences from travelers for the exclusive purpose of correctly planning meal services during the trip. When such preferences may reveal health conditions (allergies, intolerances, illnesses) or religious beliefs (kosher, halal, faith-based dietary restrictions), they constitute sensitive personal data under Article 9 of the LFPDPPP and Article 9 of the GDPR.

Processing of sensitive data requires your explicit, specific, and informed consent, which will be collected separately from general privacy consent. You may withhold this consent without being prevented from contracting a Travel Package with Rutopía; in that case, meal services will simply not be personalized.

Upon granting consent for the processing of sensitive data, you will be expressly informed of:

1. The specific purpose: planning of meal services during the trip.

2. The recipients: Local Operators, hotels, restaurants, and guides participating in the execution of the itinerary.
3. The retention period for such data: up to six (6) months after the conclusion of the trip.
4. Your right to withdraw consent at any time, without retroactive effect.

Rutopía will not use sensitive data for any other purpose, nor will it share it with third parties unrelated to the execution of the trip. Collection of this data through informal channels (messaging without a formal consent process) is expressly prohibited under Rutopía's internal procedures.

IV. Purposes of Processing

4.1 Primary Purposes (necessary for the contractual relationship)

Processing of your personal data is necessary for the following purposes, without which Rutopía's services could not be provided:

1. Managing your travel request, designing the personalized itinerary, and confirming the Travel Package booking.
2. Communicating the itinerary, booking confirmations, travel documents, and any relevant information to you before, during, and after the trip.
3. Transmitting necessary data to Local Operators and Service Providers for execution of the itinerary (name, passport, contact details, travel preferences, dietary data where applicable).
4. Processing Travel Package payments through the payment methods available on the Platform.
5. Managing modifications, cancellations, claims, and incidents during the trip.
6. Complying with applicable legal and tax obligations of Rutopía (issuance of tax receipts, immigration records where applicable, reports to competent authorities).
7. Administering and recording the commercial relationship with Commercial Partners, Local Operators, and Service Providers.

4.2 Secondary Purposes (subject to your consent)

With your consent, which may be granted or withheld at any time, Rutopía may also use your personal data to:

1. Send you commercial communications, newsletters, and promotions about destinations, new services, and Rutopía offers.
2. Conduct statistical and market studies in an aggregated and non-individualized manner to improve Rutopía's services.
3. Invite you to participate in satisfaction surveys and feedback programs.

Withholding consent for secondary purposes will not affect the provision of the main contracted service.

V. Legal Basis for Processing

The processing of your personal data is carried out on the following legal bases:

Performance of a contract: Data necessary to provide the contracted Travel Package (Arts. 6.1.b GDPR / Art. 8 LFPDPPP).

Compliance with a legal obligation: Tax, immigration, and regulatory data for authorities (Arts. 6.1.c GDPR / Art. 10 LFPDPPP).

Consent: Sensitive data (dietary preferences), commercial communications, and secondary purposes (Arts. 6.1.a and 9.2.a GDPR / Arts. 8 and 9 LFPDPPP).

Legitimate interest: Platform security, fraud prevention, aggregated internal statistical studies (Art. 6.1.f GDPR).

VI. Transfers of Personal Data

6.1 Domestic Recipients

Rutopía may share your personal data with the following recipients within Mexico, to the extent strictly necessary for each purpose:

Local Operators: Execution of the itinerary and provision of Travel Package services.

Service Providers (hotels, restaurants, guides): Operational coordination and service personalization (name, contact details, dietary preferences with consent).

Payment processors: Processing of Travel Package payments. They receive only the minimum data necessary to authorize the transaction.

Judicial and administrative authorities: Compliance with legal obligations, court orders, or administrative requests.

In all cases, Rutopía will communicate this Privacy Notice to recipients and, where required by law, will formalize agreements or confidentiality clauses obligating such recipients to process data exclusively for the purpose for which it was shared and to maintain security measures equivalent to those of Rutopía.

6.2 International Transfers

Given the global nature of Rutopía's operations and the technology services it uses, your personal data may be transferred to recipients located outside Mexico, including:

1. International Sales Channels (for example, Evaneos, based in France), to whom traveler data is transmitted for booking management. This transfer is supported by performance of the travel contract and, for European travelers, is governed by the GDPR.

2. Technology and communications service providers (cloud infrastructure, messaging tools). In particular, use of WhatsApp Business involves the transfer of data to Meta Platforms servers in

the United States. Rutopía verifies that such transfer is carried out with the mechanisms provided by law (Standard Contractual Clauses or other approved mechanisms) and operates under WhatsApp Business's Terms of Service.

3. Local Operators or Service Providers located at destinations outside Mexico, when the itinerary so provides.

For travelers with habitual residence in the European Union, Rutopía undertakes to ensure that all international transfers of their data are carried out using the mechanisms provided for in Article 46 of the GDPR (Standard Contractual Clauses approved by the European Commission or other valid mechanisms), or under the derogations in Article 49 of the GDPR where applicable.

VII. Retention Periods

Rutopía will retain your personal data for the time necessary to fulfill the purposes for which they were collected, and thereafter for the periods required by applicable law:

Data of booking and travel contract: 5 years from the conclusion of the trip (civil and tax obligations).

Tax and invoicing data: 5 years pursuant to the Federal Tax Code (Código Fiscal de la Federación).

Sensitive data (dietary preferences): 6 months after the conclusion of the trip, or until consent is withdrawn.

Commercial communications data: Until you withdraw your consent or request deletion of your data.

Commercial Partner data: During the term of the commercial relationship and 5 years after its termination.

Once the above periods expire, Rutopía will proceed to the definitive deletion or anonymization of the data, unless a specific legal obligation requires their retention for a longer period.

VIII. Security Measures

Rutopía implements technical, administrative, and physical measures to protect your personal data against unauthorized access, loss, alteration, disclosure, or destruction. These measures include, by way of example and without limitation:

- Encryption of data in transit (TLS/HTTPS) in all communications through the Platform.
- Role-based access control: only authorized personnel with a justified need may access personal data.
- Regular staff training on data protection and confidential information handling.
- Documented procedures for managing security incidents and data breaches.
- Confidentiality and data protection agreements with Local Operators, Service Providers, and technology vendors.

In the event of a security breach that may pose a significant risk to the rights and freedoms of data subjects, Rutopía will notify the competent authorities within the timeframes established by law and, where appropriate, will inform affected data subjects of the nature of the breach and the measures adopted.

IX. Rights of Data Subjects

9.1 ARCO Rights (all data subjects — LFPDPPP)

Under the LFPDPPP, you have the right to:

- Access: know what personal data we hold about you, for what purposes we use it, and to whom we have shared it.
- Rectification: request correction of your data when it is inaccurate, incomplete, or out of date.
- Cancellation: request deletion of your data when it is no longer necessary for the purpose for which it was collected, has been used for unconsented purposes, or the contractual relationship has ended.
- Opposition: object to the processing of your data for specific purposes, including the sending of commercial communications.

9.2 Additional Rights for European Travelers (GDPR)

Additionally, data subjects with habitual residence in the European Union have the following rights under the GDPR:

- Right to erasure ("right to be forgotten"): request deletion of your data in the circumstances provided for in Article 17 of the GDPR.
- Restriction of processing: request that processing of your data be restricted to mere storage while a complaint is resolved or the accuracy of the data is verified.
- Data portability: receive your data in a structured, commonly used, machine-readable format, or request that it be transmitted directly to another controller.
- Objection to processing based on legitimate interest: object at any time to the processing of your data where this is based on Rutopía's legitimate interest.
- Right not to be subject to automated decision-making: not to be subject to decisions based solely on automated processing that produce legal effects or significantly affect you.

9.3 How to Exercise Your Rights

To exercise any of the above rights, you must submit a written request to contacto@rutopia.com, including:

1. Your full name and a contact method for receiving the response.
2. A copy of a valid official identity document (or that of your legal representative, if applicable).

3. A clear and precise description of the data or processing in respect of which you wish to exercise your right.
4. Any additional information that may facilitate the location of your data.

Rutopía will respond to your request within twenty (20) business days of receipt under the LFPDPPP, or within the one (1) month period provided in Article 12 of the GDPR for European data subjects, extendable by two additional months in complex cases with prior notice. Handling rights requests is free of charge for one request per quarter; additional requests in the same period may be subject to a reasonable fee.

9.4 Withdrawal of Consent

You may at any time withdraw the consent you have granted for the processing of your personal data, including consent for sensitive data and commercial communications, without this affecting the lawfulness of processing based on consent prior to withdrawal. Withdrawal must be requested in writing to contacto@rutopia.com. Rutopía will process the request within a maximum of fifteen (15) business days and will notify the data processors to adopt the corresponding measures.

9.5 Complaints to Supervisory Authorities

Data subjects in Mexico: if you believe that Rutopía has not correctly handled your request, you may file a complaint with the Secretariat of Anticorruption and Good Governance (Secretaría de Anticorrupción y Buen Gobierno).

Data subjects in the European Union: you may file a complaint with the data protection authority of your Member State of habitual residence (for example, the CNIL in France or the Garante in Italy).

X. Cookies and Tracking Technologies

The Platform uses first-party and third-party cookies, as well as similar technologies (pixels, web beacons), for the following purposes:

Technical / essential: Basic Platform operation, security, and session authentication. Legal basis: Necessary — no consent required.

Analytics: Traffic measurement, navigation behavior analysis, and Platform improvement (e.g., Google Analytics). Legal basis: Consent or legitimate interest (depending on jurisdiction).

Preferences: Remembering the Traveler's language, currency, and configuration preferences. Legal basis: Consent.

Marketing / advertising: Displaying personalized content and relevant advertising within and outside the Platform. Legal basis: Explicit consent.

You may manage your cookie preferences at any time through the cookie management panel

available on the Platform or through your browser settings. Disabling essential technical cookies may affect the proper functioning of the Platform.

XI. Representative in the European Union

Article 27 of the GDPR requires that controllers not established in the European Union who process data of persons located in the EU designate a representative in the European Union.

Rutopía is in the process of designating its representative in the European Union pursuant to Article 27 of the GDPR. Once designated, their contact details will be published in this Privacy Notice and on the website www.rutopia.com. The EU representative will act as a point of contact for European travelers and for data protection authorities of the Member States.

While this designation is being completed, European data subjects may direct their inquiries and rights exercise requests directly to Rutopía at contacto@rutopia.com.

XII. Amendments to this Privacy Notice

Rutopía may amend this Privacy Notice at any time to adapt it to regulatory changes, new processing purposes, or improvements to its internal privacy processes. Any amendment will be notified to data subjects at least fifteen (15) calendar days before it takes effect, through:

- Publication of the updated version at www.rutopia.com with an indication of the date of the most recent update.
- Email notification to data subjects who have provided their email address and have consented to receiving communications.

If an amendment involves new processing of sensitive data or a new purpose requiring your consent, Rutopía will obtain such consent before initiating processing.

Continued use of the Platform following notification of non-material changes will constitute acceptance of the updated version of this Privacy Notice.

XIII. Digital Form and Validity

This Privacy Notice may be accepted in digital or electronic format through the Platform, without the need for a handwritten signature, and is equally binding pursuant to the Mexican Commercial Code (Código de Comercio de México) and other applicable legislation.

The Traveler who signs or accepts this document (hereinafter, the “Lead Traveler”) acts on their own behalf and, where applicable, on behalf of all other travelers included in the booking identified in this instrument, holding for that purpose the express authorization of each of them. Consequently, the declarations, acceptances, and obligations contained herein are binding on all travelers in the booking. Rutopía may request, at any time, evidence of such authorization.

Once the Lead Traveler has signed or accepted the documents governing their relationship with Rutopía, Rutopía will send each of the other travelers in the booking, to the email address provided for that purpose, a copy of the accepted documents, expressly stating that the Lead Traveler has acted in their name and on their behalf. Each recipient traveler will have a period of fifteen (15) calendar days, counted from receipt of that notice, to state, by written communication addressed to viaja@rutopia.com, their repudiation or non-acceptance of the documents sent. If that period elapses without Rutopía having received any such communication, the traveler will be deemed to have given tacit consent to all the terms and conditions contained in the notified documents, in accordance with the provisions of artículo 1803 del Código Civil Federal, in relation to the artículos 89 a 114 del Código de Comercio de los Estados Unidos Mexicanos. Electronic notice sent to the email address provided by the Lead Traveler will have full legal validity and effect as a reliable means of communication, under the terms of the artículos 89 y 90 del Código de Comercio.

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Document owner: Rutopía Turismo Biocultural, S.A.P.I. de C.V.

Privacy contact: viaja@rutopia.com

Regulatory framework: LFPDPPP (Mexico) · GDPR (EU) · PTD Directive (EU)