

COMPREHENSIVE PRIVACY NOTICE

Instituto Hipotecario

Effective date and last updated: August 12, 2026

SCOPE

This Comprehensive Privacy Notice informs individuals who visit or use <https://institutohipotecario.mx> (the "Site") about how personal data is collected and processed through contact forms, the systems that support them, and authorized communications. This Notice does not constitute a contract of adhesion merely by accessing the Site; its purpose is to enable the data subject to understand the characteristics of the processing and make informed decisions.

DATA CONTROLLER AND ADDRESS

The controller responsible for the processing of personal data is Miguel Ángel Gutiérrez Sarmiento, an individual conducting business activities under the trade name Instituto Hipotecario (the "Controller").

Controller address: Chimalcoyotl 14 Int. 4, Colonia Toriello Guerra, Tlalpan, Mexico City, Postal Code 14050. Email for privacy matters and ARCO rights: contacto@institutohipotecario.mx.

PERSONAL DATA THAT MAY BE COLLECTED

The Site is designed to collect only the data necessary to handle contact forms and manage their follow-up. Depending on the content provided by the data subject, the following data may be processed:

- Name of an individual and/or trade name of a company. When a trade name identifies or makes an individual identifiable, it will be treated as personal data.
- Email address.
- Telephone number.
- Message or comments.
- URLs voluntarily included by the data subject in the message, if applicable.
- Form source path, expressly permitted UTM parameters, and sanitized referrer.
- Submission date and time, reference number (folio), record status, and technical identifiers required for integrity, deduplication, security, and operation.

The MVP does not deliberately request sensitive, financial, or asset-related personal data. If an individual voluntarily includes unsolicited information in a free-text field, the Controller will seek to limit its processing to what is strictly necessary to address the message and to apply data minimization and deletion measures where appropriate.

PRIMARY PURPOSES OF PROCESSING

Personal data will be used for the following purposes that are necessary or directly related to the data subject's request:

- Handle requests for information and contact.
- Follow up with individuals interested in Instituto Hipotecario's services.
- Respond to inquiries.
- Where applicable, initiate or continue the commercial process requested by the data subject.

- Maintain the integrity and security of the forms, prevent spam or abuse, avoid duplicate processing, and preserve technical traceability.
- Attribute the source of prospective customers through the source path, permitted UTM parameters, and sanitized referrer, without performing comprehensive navigation tracking.

SECONDARY MARKETING PURPOSE AND OPTIONAL CONSENT

Additionally, and only when the data subject selects a separate, optional, and unchecked checkbox, the Controller may use contact data for future marketing campaigns by email and WhatsApp, including advertising, promotions, newsletters, and/or commercial communications.

Refusal to provide this consent does not prevent the primary contact request from being handled. Marketing consent may be withdrawn at any time by contacting contacto@institutohipotecario.mx, without retroactive effect.

COOKIES, LOCAL STORAGE, ANALYTICS, AND TRACKING

Within the current scope of the MVP, session cookies and cookie-based authentication are not used, and non-essential cookies are not contemplated. Accordingly, no cookie consent manager or banner has been implemented for analytics or advertising.

The language preference may be stored in localStorage; the URL will take precedence. This value will not be used to profile users.

Google Analytics, GA4, Google Tag Manager, Meta Pixel, PostHog, Matomo, and equivalent platforms have neither been approved nor installed. When a form is submitted, source attribution is limited to the source path, expressly permitted UTM parameters, and a sanitized referrer associated with the form record; the visitor's complete navigation is not tracked.

The API may use request identifiers and structured logs for operation and diagnostics. Logs must redact or exclude email addresses, telephone numbers, messages, and other unnecessary personal data. hPanel will be used to monitor availability and resources, not to build commercial profiles.

Anti-spam measures include honeypots, a minimum interaction time, request limits, and payload validation/limits. Cloudflare Turnstile is not active within the approved scope; if enabled, its privacy impact must be reviewed beforehand and this Notice updated where necessary.

INFRASTRUCTURE, DATA PROCESSORS, AND TRANSFERS

The Site's frontend, backend, private API, and MySQL database are hosted by Hostinger. To the extent that this provider processes data on behalf of and under the instructions of the Controller in order to provide infrastructure or hosting services, its involvement is considered processing by a data processor and not a transfer for its own independent purposes.

The MVP does not contemplate transfers of personal data to third parties for their own independent advertising, profiling, or marketing purposes. Communications or transfers may take place when necessary or legally required by a legal provision, a competent authority, the performance of a legal relationship, the recognition, exercise, or defense of a right, or another circumstance permitted by applicable law.

If a provider, technology, or recipient is incorporated in the future and entails a new transfer, purpose, or materially different processing activity, the Controller will conduct the corresponding privacy review and update the Notice and/or request the applicable consent.

SECURITY AND CONFIDENTIALITY MEASURES

The Controller will maintain reasonable administrative, technical, and physical measures to protect personal data against damage, loss, alteration, destruction, or unauthorized use, access, or processing. Persons involved in processing must maintain the confidentiality of personal data even after their relationship with the Controller has ended, as applicable.

RETENTION, DELETION, AND RELATIONSHIPS BETWEEN RECORDS

As an ordinary rule, form records with status new, contacted, closed, or spam will be retained for a maximum of 12 months from created_at. For new/contacted records, this period includes handling requests, the requested commercial follow-up, and, where valid marketing consent exists, the possibility of conducting email and WhatsApp campaigns during the same period.

At the end of the ordinary retention period, personal data will be deleted unless a blocking period applies due to a cancellation request, a legal obligation exists, or a duly documented legal hold is in place. Dependent email_outbox records will be deleted by cascade when the submission is deleted. marketing_consent will also be deleted by cascade, except for separate minimum evidence when necessary to demonstrate consent, refusal, withdrawal, or objection during the authorized period or an applicable blocking period/legal hold.

- Marketing consents: 12 months from captured_at. If granted=false, limited evidence of the refusal may be retained to prevent unauthorized communications. If granted=true, minimum evidence of consent may be retained during the applicable period; such evidence will not be used as an active lead or for any other purpose.
- Email outbox: sent, up to 12 months from sent_at; failed, up to 6 months from the last attempt; dead_letter, up to 30 days from classification; in all cases subject to earlier deletion when the related submission is deleted. pending/processing is retained only for as long as necessary to complete or retry delivery. The sanitized last_error_code will be retained for up to 30 days.
- Backups: may contain data for a maximum of 30 days. If a backup is restored, previously recorded cancellations, blocks, objections, and deletions must be reapplied before the restored data returns to ordinary processing or campaigns.
- Technical tombstone: may be retained for up to 12 months after deletion only with the reference number (folio) and idempotency_key irreversibly disassociated from any data or source that could identify or reidentify an individual. If those values remain linkable, they must be treated as personal data and deleted or blocked as appropriate.
- Deletion process: the system administrator will execute or review deletions daily. The Legal Department will oversee ARCO requests, exceptions, and legal holds. A legal hold may only be authorized by the Legal Department for a documented reason and will be reviewed monthly until the reason justifying it no longer exists.

ARCO RIGHTS, OPPOSITION, AND WITHDRAWAL OF CONSENT

The data subject or their legal representative may exercise the rights of Access, Rectification, Cancellation, or Opposition (ARCO), as well as request the withdrawal of marketing consent, by sending a request to contacto@institutohipotecario.mx. The Legal Department will be responsible for processing these requests.

- The request must include: the data subject's name and a means for receiving notifications; appropriate documents or elements to prove identity and, where applicable, representation; a clear description of the data involved, except for the right of access; the right to be exercised or the specific request; and any element that facilitates locating the records. The reference number (folio) will be the primary method for locating a record

and the email address will be the fallback; the telephone number may be used only as an auxiliary element when necessary and proportionate.

- Access: the determination will be communicated within a maximum of 20 business days from receipt. If the request is granted, access will be provided within the following 15 business days after the response is communicated, subject to proof of identity.
- Rectification: in addition to the general requirements, the requested changes must be specified and supporting elements must be provided where appropriate. The same periods apply: 20 business days to communicate the determination and 15 business days to implement an approved rectification.
- The foregoing periods may be extended once for an equal period when the circumstances of the case justify it.
- Cancellation: where applicable, the data will enter a blocking period during which it may not be used for ordinary purposes and may only be retained to address liabilities arising from the processing. Once the applicable blocking period has ended, the data will be deleted and the data subject will be informed. Cancellation may be denied in the circumstances permitted by applicable law.
- Opposition and marketing: a valid opposition to marketing or withdrawal of marketing consent will result in the prompt cessation of new promotional communications. If the primary record remains active for a primary purpose, the consent will be updated to granted=false and limited evidence of the refusal may be retained for the applicable period solely to honor the request and demonstrate compliance.
- The exercise of ARCO rights is free of charge, without prejudice to any reproduction, copying, or delivery costs that may lawfully apply.

EVIDENCE OF REQUESTS AND EXCEPTIONS

For each ARCO request, only the evidence necessary to demonstrate its receipt, analysis, and execution will be retained: reference number (folio), date, right exercised, result of identity verification, determination, response/execution dates, and, where applicable, the basis for a denial, extension, blocking period, or exception. This evidence will be retained for 12 months from closure, unless a legal obligation, statute of limitations period, or legal hold requires a longer period.

Exceptions to a cancellation, opposition, or deletion will be limited to the circumstances permitted by the Federal Law on the Protection of Personal Data Held by Private Parties (Ley Federal de Protección de Datos Personales en Posesión de los Particulares) and other applicable provisions, including legal obligations, legal impediments or authority decisions, contractual or legally acquired obligations, and the recognition, exercise, or defense of rights.

OPTIONS TO LIMIT USE OR DISCLOSURE

The data subject may request at any time that their data not be used for marketing or commercial communications by contacting contacto@institutohipotecario.mx. Withdrawal of consent or opposition to marketing does not affect the handling of a primary request already made and has no retroactive effect. Where applicable, the Controller will record the refusal to prevent new promotional communications during the applicable retention period.

CHANGES TO THE PRIVACY NOTICE

This Notice may be modified due to changes in legal, technical, operational, provider-related, or processing-purpose requirements. Material changes will be published at <https://institutohipotecario.mx> and, where required by the nature of the change or by law, the data subject's consent will be obtained again before applying a different purpose or processing activity that requires it.

EFFECTIVE DATE

This Comprehensive Privacy Notice takes effect on August 12, 2026 and must remain synchronized with the Controller's current Retention, Deletion, and ARCO Policy.