

POLICY	Fundación Universidad de las Américas, Puebla	DATE: 07/01/14	
POL-006-03	PERSONAL DATA PROTECTION	P. 1/19	ED.2.0
REVIEWED BY: Mónica Ruiz Huerta Administrative Vice President Jesús Salvador Mijangos Patiño Legal Affairs Director		AUTHORIZED BY: Dr. Luis Ernesto Derbez Bautista President	

I. Objective

Fundación Universidad de las Américas, Puebla (UDLAP), honoring the fundamental right to privacy and to one's identity that are part of a person's self-determination regarding information, emits this Policy aimed to regulate the institutional practices as well as to establish a Privacy Policy for the university community's information.

II. Definitions

- **Privacy Notice:** Fundación Universidad de las Américas, Puebla document that is printed, electronic or generated with any other technology, which will be available to the owners of personal data, before these are processed.
- **Consent:** Expressly affirmative manifestation of the will of each person so that Fundación Universidad de las Américas, Puebla processes his/her personal data. Consent must be given in writing, by electronic media or any other technology.
- **Personal Data:** Any information concerning an identified or identifiable person.
- **Sensitive Personal Data:** Personal data that intimately affects a person, or whose use may derive in discrimination or serious risk for their owner. For this Policy's purpose sensitive data are considered to be, among others, ethnic or racial origin, past health issues, physical marks or genetic information, religious, political or moral beliefs, union affiliation, sexual orientation and personal habits.

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- **Data Controller:** Academic, administrative or student unit of the Fundación Universidad de las Américas, Puebla, as well as a person or entity related to it that deals with personal data due to their functions.
- **Law:** *Ley Federal de Protección de Datos Personales en Posesión de Particulares y su Reglamento* (Federal Law for the Protection of Personal Data in Possession of Third Parties and its Regulations.)
- **Transmission:** Data communication between data controllers at the Fundación Universidad de las Américas, Puebla.
- **Third Party:** Individual or entity, national or foreign, different from the Fundación Universidad de las Américas, Puebla.
- **Owner:** Individual whose personal data is in possession of Fundación Universidad de las Américas, Puebla.
- **Transfer:** Data communication to a person different from data controllers of the Fundación Universidad de las Américas, Puebla.
- **Processing:** Obtainment and use, including access, handling, employment, transfer, disposal, dissemination or storage of personal data by any means.
- **University:** Fundación Universidad de las Américas, Puebla.

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III. Provisions

1. When the “University,” in its interaction and relations with students, employees, suppliers and “third parties,” handles diverse personal data to fulfill its duties and within its rights, it will follow at every moment the “Law”, provisions and other applicable legal norms as well as the values and principles of the “University.”
2. The “University” will adopt the necessary measures so the “Law” is enforced with this Policy and the **Privacy Notice (Annex 1)**.
3. Academic Department Heads and Area Directors, as a minimum level, as well as the CEUDLAP President and the legal counsel of people working for the “University,” will be responsible for the use given by the corresponding “data controller.” The individuals mentioned above may appoint the “data controllers.”
4. The “University” through the “data controllers” should make sure that the “personal data” in their database is pertinent, correct and current for the purposes they are received.
5. “Processing” “personal data” by the “University” shall be limited to the purposes foreseen in the “Privacy Notice” and, if appropriate, to the instruments through which “personal data” are directly obtained from their “owners.” Such “processing” must be necessary, adequate and relevant in relation to the purposes mentioned before.
6. Within the academic, administrative or student units of the “University” only those persons who need to deal with “personal data” to perform their job, and following the aims foreseen by the “Privacy Notice” or corresponding document may handle “personal data.” Assuming that individuals or entities that service the “University” have access or deal with “personal data” of the university community on behalf of

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the “University,” such persons and, if needed, their personnel are bound to observe the “Law,” this Policy and the “Privacy Notice.”

7. Every employee, student, supplier, external consultant, auditor or any other person who due to their functions regarding the “University” has access to “personal data,” must accept the obligation to obey the “Law,” this Policy and the “Privacy Notice,” as well as keeping confidential the information they have access to.
8. The “University” will identify and guard the personal data once its purpose has been fulfilled in order to determine responsibility for its control until its contract or legal prescription expires. During this period the “personal data” will not be used and once finished it will be cancelled. When “personal data” are cancelled the owner will be notified.
9. When a student, employee, supplier or “third party” “process” “personal data” in their private interactions or relationships outside the means established by the “University” for such purpose, he/she will be responsible for such “processing,” freeing the “University” from all claims and/or actions derived from such “processing.”
10. The Legal Office will be responsible for:
 - a. Furthering a culture of “personal data” protection at the “University” through training courses, roundtables, pamphlets, lectures or any other means deemed pertinent.
 - b. Making a periodical inventory of “personal data” and “data controller” systems.
 - c. Determining the functions and obligations of individuals and entities related to the “University” that handle “personal data” on its behalf.

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- d. Having a “personal data” risk analysis, identifying dangers and evaluating risk for the database in possession of the “University”.
 - e. Proposing and implementing--with the academic, administrative and student areas—security measures applied to the “personal data” held by the “University” and to identify those that are effective.
 - f. Review the “processing” carried out by the “data controllers.”
 - g. Train “University” personnel in matters related to the protection of “personal data.”
 - h. Receive consultations from academic, administrative or student units of the “University” about “Law” enforcement in concrete cases.
 - i. Propose amendments to this Policy and to the “Privacy Notice.”
11. Any situation unforeseen in this policy will be analyzed and authorized by the President or a person appointed by him/her.

Privacy Notice and Consent

12. The “Privacy Notice” of the “University” must be available to the university community in electronic and printed media, and be visible in areas where “personal data” is obtained directly from the “owner.” Assuming that a disabled member of the university community requires the “Privacy Notice” in another form, he/she will notify the “data controller” so an accessible format for his/her kind of disability is provided.
13. The “University” “Privacy Notice” will establish as a minimum the following:
- a. The “University” address.

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- b. The ends for which the data will be used.
 - c. The options and means to limit the use or circulation of “personal data.”
 - d. The means to exercise ARCO (Access, Rectification, Cancellation and Objection) rights.
 - e. The data “transfers” permitted.
 - f. The “data controller” who will receive and answer the requests related to the “processing” of “personal data” from the “owner.”
 - g. The process and means the “University” will use to communicate to the “owners” changes in the privacy notices.
14. The “data controllers” may propose the design of physical and electronic instruments for the “processing” of “personal data” for specific ends related to their functions. Such instruments must contain at least the name and address of the “University”, the reason for such “processing” and a reference to the “Privacy Notice.” These instruments must be approved by the Legal Department.
15. The “owner” of the “personal data” (or the person exercising parental authority when the “owner” is a minor) must grant “consent” to the “University” to “process” “personal data”, except in these cases:
- a. To meet legal obligations between the “owner” and the “University.”
 - b. When national legislation or treaties signed by Mexico allow it.
 - c. When “personal data” are found in sources of public dominion, including the institution’s webpage, or are derived from a social interaction outside the functions of the “data controller.”

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- d. When the “personal data” are dissociated from the “owner” in a way that neither their organization, presentation nor contents permit his/her identification.
 - e. When an emergency situation arises that may harm the “owner” in his/her person or property.
 - f. When the use of “personal data” is indispensable for medical attention, prevention, diagnosis or sanitary assistance, whenever (i) the “owner” is in no condition to give his/her “consent” under the law, and (ii) the person doing the data “processing” is bound to professional secrecy or a similar obligation.
 - g. When dealing with individuals as professionals or merchants and/or when they provide services for the “University,” or another individual or entity with business activities, consisting only of full name, position, address, email address, phone and fax number, provided the information is used for representation of the employer or supplier.
 - h. When commanded by a competent authority.
16. The “consent” of the “owner” for “transfers” of national or international data will not be required in the following circumstances:
- a. When a law or treaty foresees the “transfer”.
 - b. When the “transfer” is needed for medical prevention and diagnosis, healthcare, medical treatment or sanitation.
 - c. When the “transfer” is needed because of a current or future contract between the “University” and a “third party”, in the interest of the “owner” and in adherence to the ends established in the “Privacy Notice.”

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- d. When the “transfer” is necessary or legally required in the public interest, or for the enforcement or administration of justice.
 - e. When the “transfer” is necessary for the acknowledgement, exercise or defense of a right in a judicial process.
 - f. When the “transfer” is necessary for maintaining or fulfilling a legal relationship between the “owner” and the “University.”
17. Assuming that one of the “data controllers” of the “University” requires to “transfer” “personal data” to a country where the laws regarding the protection of personal data do not meet the minimal standards established by the “Law” and this Policy, this “transfer” should be structured around model clauses approved by the Legal Department.
18. Every “transfer” is to be formalized by communicating to the receiving “data controller” the “University” “Privacy Notice”, as well as the conditions under which the “owner” consented to give his/her “personal data.”
19. All “processing” of “personal data” requires that the “data controllers” obtain a direct “consent” from the “owner,” written and explicit with their signature, electronically or through any other means of authentication established, regardless of the quality and security level of such data; or, to verify the particular conditions of consent related to the “personal data” at their disposal.

Security Measures

20. The University through the “data controllers” will classify the “personal data” in their possession according to the security levels described below:

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- a. **Level A:** “Personal data” such as name, address, private and cell phone numbers, email, RFC, CURP, dependents and beneficiaries, language and others. These data may be transmitted between “data controllers” who require them to meet their obligations and may also be obtained directly from the “owners” for specific purposes.
 - b. **Level B:** “Personal data” related to academic performance, professional trajectory, conduct, transit and migratory movements, among others. “Personal data” included in this level require a certain access profile and their “processing” will be the responsibility of the “data controllers” whose work requires access to them. The “transmission” and “transfer” of this “personal data”, shall be requested and justified to the “data controller” by a Director or Dean as a minimum.
 - c. **Level C:** “Personal data” that contain information related to property or finances, legal or administrative proceedings in the form of trials, ideology, religion, personal habits, health, sexual orientation, ethnic or racial origin, among others. The Legal Department will authorize the “processing” of the “personal data” included in this level only if there is a legitimate and justified purpose for the “data controllers.” “Personal data” of this level will require an access profile and their “processing” will be the responsibility of “data controllers” whose functions require it. The “transmission” and “transfer” of “personal data” must be requested and justified to the “data controller” by the corresponding Vice President; or else by the Administrative Vice President for areas that do not have such hierarchy.
21. The “data controllers” or the Legal Department shall design, establish and maintain administrative, technological and/or physical security measures to protect “personal data” against damage, loss, alteration, destruction, and unauthorized

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“processing.” Security measures must be equivalent to those used for “University” information.

22. When security is breached, significantly affecting “personal data”, the “data controllers” must inform the “owners” in writing about this fact, so they may adopt measures to defend their rights.

ARCO Rights

23. “Owners” shall have rights of access, rectification, cancellation and objection in terms of the “Law,” and this right may be exercised at any time by the means established in the “Privacy Notice.”
24. Applications by “owners”, or by their legal representatives, to access, rectify, cancel or object, must be presented in writing to the corresponding “data controller” indicated in the “Privacy Notice.” Such applications must:
- a. Contain at least the name of the “owner” of the “personal data” referred to in the application.
 - b. Have documents that certify the identity of the “owner” and, if needed, of his/her legal representative.
 - c. Indicate the address or email address of the “owner” or legal representative so the “University” may respond to the application.
 - d. Describe in a clear and precise way the “personal data” for which the application is presented.
 - e. Provide data or exhibit any other document that facilitates locating the “personal data.”

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25. The “University” will have twenty business days from the “personal data” access, rectification, cancellation or objection application date to respond to the applicant with its decision. If the application proceeds, it will be effective within fifteen business days from the date it is answered. These deadlines may be extended only once for the same length of time when circumstances merit it. Information will be given upon full identification of the applicant or his/her legal representative.

Data controllers

26. Every “data controller” must:
- a. Manage only the “personal data” allowed to him/her under the “Law” and this Policy.
 - b. Keep confidential all “personal data” handled.
 - c. Establish physical and administrative measures to restrict access of unauthorized persons to the area, as well as all measures to make sure that the “personal data” are duly protected, such as locks, electronic devices, access passwords or any other technology, and keeping files and furniture locked.
 - d. Arrange a physical space intended for consultation of “personal data” by the “owner” or his/her legal representative.
 - e. Inform the Legal Office through the electronic address datos.personales@udlap.mx, when an unauthorized person has entered the consultation and secure area, or when there is evidence that the security of the “personal data” has been jeopardized.

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f. Remove “personal data” when the end of “processing” has been met and there is no legal provision to keep the “personal data”.

27. The relationship between “University” and the “data controllers” that justifies “personal data” “processing” must be formally established in scope and content in the contract clauses or other legal documents established by the Legal Department.

Compensatory Measures

28. The “University” may implement compensatory measures; that is to say, alternate mechanisms to let the “owners” know the **Privacy Notice (Annex 1)** when the “personal data” were obtained before July 6, 2011 and the following conditions apply:

a. An impossibility to let each “owner” know the **Privacy Notice (Annex 1)**, namely when the “University” does not have the “owners” contact information, either because the information is not on file, archives or databases, or because these are not current, correct, complete or exact.

b. That delivering the **Privacy Notice (Annex 1)** to each one of the “owners” demands a disproportionate effort, represents excessive expense that endangers the financial stability of the “University,” or that such activity is significantly disruptive of all the actions that the “University” performs daily.

29. Prior to implementing a compensatory measure, the corresponding “data controller” must cancel all “personal data” that have ceased to be needed for the ends that gave rise to their “processing” and the applicable legal obligations.

30. The “University” may publish the **Privacy Notice (Annex 1)** through the following media, adhering to the “owners” profile for whom the compensatory measure is

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destined, to the “University” purpose and to the particular features of the medium in which the **Privacy Notice (Annex 1)** will be published:

- a. National newspapers when the “owners” are located in the country.
- b. Local newspapers or specialized magazines when the “owners” reside in the place where the newspapers circulate.
- c. Website www.udlap.mx.
- d. Information posters located at the “University” when the owners visit the installations, or in frequented sites in its proximity.
- e. Another means of mass communication, previously approved by the “Personal Data Area.”

IV. Transitory Article

This policy cancels all previous regulations related to the topic and will enter in force on the day following its publication in Intranet.

V. Documents Directly Related

Code of Ethics

VI. Change History

Edition Number	Change Description	Change Date
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1.0	New Document	July, 2011
2.0	<p>The Policy's objective was detailed. Definitions were updated and the definitions for "data controller" and "transmission" were added.</p> <p>The responsibility of processing by the data controllers regarding the possession of personal data by UDLAP, as well as making sure that these are pertinent, correct and updated for the ends they were collected. Implementation of secondary documents other than the Privacy Notice to obtain informed consent.</p> <p>The responsibilities of the Legal Department were detailed.</p> <p>Attention to applications of ARCO rights was extended to the areas in charge.</p> <p>The exceptions to obtain an informed consent were defined, derived from social and professional interactions.</p> <p>Personal data were classified according to risk level, in order to limit transmissions and transfers.</p> <p>A system of compensatory measures was added relative to data obtained previous to the Policy of Protection of Personal Data and its Privacy Notice entering into force.</p> <p>The Privacy Notice was updated.</p>	January, 2014

VII. Annex

Annex Number	Annex Title	Code	Does it Require Authorization for Updating?
1	Privacy Notice	-	YES

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Annex 1

Privacy Notice

Fundación Universidad de las Américas, Puebla

Fundación Universidad de las Américas, Puebla (UDLAP), respectful of every person's fundamental right to privacy and his/her own identity, and complying with the Mexican legal framework, and in particular with the *Ley Federal de Protección de Datos Personales en Posesión de los Particulares y su Reglamento* (Federal Law for the Protection of Personal Data in Possession of Third Parties and its Regulations), makes available for such persons this Privacy Notice.

UDLAP, when dealing with students, employees, suppliers and third parties, uses various personal data to fulfill its obligations and protect its rights.

Objectives and Processing by Third Parties.

Under its foundational objective, UDLAP promotes and fosters higher education, scientific research and cultural dissemination in and outside Mexico. For this reason, UDLAP handles personal information that may contain sensitive personal data to fulfill obligations derived from contracts and agreements celebrated with their owners; to comply with constitutional regulations, in particular with those derived from article 3 and from the second paragraph of article 16 of the *Constitución Política de los Estados Unidos Mexicanos* (Political Constitution of the Mexican United States); to respond to emergency situations that may pose a risk to the integrity or property of the owner; and in general to provide educational, cultural, athletic, recreational and other services for the university community as well as for visitors, suppliers and third parties. Processing personal data includes obtainment, use, storage, handling, application, transfer, disposition and dissemination of data by any means, subject to the Federal Law for the Protection of Personal Data in Possession of Third Parties and its Regulations, to the General Criteria for the instrumentation of compensatory measures without expressed consent of the *Instituto Federal de Acceso a la Información y Protección de Datos* (Federal Institute for Information Access and Data Protection), and of this Privacy Notice derived from the latter.

Before giving any personal data to UDLAP by any means, you should confirm that you agree with the terms of the UDLAP Policy for the Protection of Personal Data of this Privacy Notice and of the physical and/or technological instruments derived from them, so you can give an informed consent on the terms of articles 6, 8, 16 y 17 of the Federal Law for the Protection of Personal Data in Possession of Third Parties. If you do not agree with the content of the instruments here referred to, do not supply data. If you decide not to give

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UDLAP certain personal data, or you wish to exercise your right to cancel, you accept the possibility that UDLAP denies you access to its facilities, activities or other services.

In agreement with everything expressed above and adhering to the principles of information and purpose, UDLAP lets you know that it can:

- a. Transfer your personal data to third parties from whom it has hired processing services, within the framework of a voluntary agreement with UDLAP, on the terms of section IV of article 10 of the Federal Law for the Protection of Personal Data in Possession of Third Parties and article 17 of its derived Regulations, to carry out accreditation and certification processes and socioeconomic studies so that UDLAP may exercise its rights as well as offer data owners academic, cultural, medical and sports services.
- b. Transfer your personal data to other national and foreign educational institutions to realize academic, cultural and sports projects, in which case only the indispensable data needed for specific activities or services requested by the owner will be transferred, following the principle of proportionality.
- c. Transfer your personal data related to any financial aid plan that the owner has applied for or received.

Consistent with articles 50 and 53 of the Regulations of the Federal Law for the Protection of Personal Data in Possession of Third Parties, third parties who receive personal data for processing will receive only those required for their activities, according to UDLAP's instructions, keeping strict confidentiality about the data received.

Likewise, some personal data such as your name, address, phone number and email may be used by UDLAP to send you information about our services, cultural, sports and academic events, projects and raffles, among others, as well as to structure actions based on General Criteria for implementing compensatory measures without explicit authorization of the Federal Law for the Protection of Personal Data in Possession of Third Parties and its Regulations.

Videos, Audio and Photographs.

UDLAP records audios and videos and takes photographs of events such as classes, lectures, and sports, cultural, recreation and outreach events among others. When you enter the UDLAP campus, on the terms of article 74 of the Regulations of the Federal Copyright Law and of paragraphs 21 and 23 of UDLAP's Policy of Intellectual Property, you

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acknowledge that you may be recorded and/or photographed, and you accept that UDLAP is entitled to use, distribute or publicize recordings and/or photographs for courses, classes and other activities related to its objectives.

Security Measures.

In order to protect your personal data, UDLAP has classified the information it legally possesses and has designed legal, operational and technological measures, according to the nature of the data and processing they are subjected to. Likewise, UDLAP periodically trains personnel who deals with personal data.

Use of Cookies, Web Beacons and Other Similar Technology.

In the performance of its duties, UDLAP uses mechanisms in remote or local electronic media to collect personal data simultaneously and automatically, in order to determine browser types and operational systems, webpages consulted, visit origin, IP access address, time spent in the University website and other statistical data. UDLAP uses *cookies*, consisting of small bits of information sent directly to the Institution's website and stored in its browser to know users' activity and to speed up associated procedures. In like manner, *web beacons* and *JavaScripts* of web metrics are used to store information about the Institution's website use. Those mechanisms may be disabled when they are not needed for the operations of the Institutional website.

Limits for Storing Personal Data.

The limits for storing personal data will not exceed those needed to fulfill the obligations described here. Once fulfilled, and when there is no legal provision against it, UDLAP will proceed to cancel your personal data.

Means to Exercise ARCO Rights

When you wish to exercise the rights of access, rectification cancellation or objection linked to your personal data, you or your legal representative must go in person to UDLAP's address (Ex Hacienda Santa Catarina Mártir S/N, San Andrés Cholula, Puebla, México, C.P. 72810) where the specific data control area will receive and process the owner's application; or, you may present your application via email to the data controller and/or to datos.personales@udlap.mx.

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ARCO applications must have: 1) complete name, 2) documents to certify your identity or that of the legal representative acting in your name, 3) address or email address where UDLAP may respond to your application, 4) a clear and precise description of the personal data presented in the application, and 5) any additional data or documents that facilitate locating your personal data.

UDLAP will have 20 business days from the date the ARCO application was received to answer. If the application proceeds, it will be effective within 15 business days from the date the answer was communicated. These terms may be extended only once and for the same length of time when the particular circumstances of the case merit it. Information will be released after proving your identity or that of your legal representative.

If you want to revoke the consent given to UDLAP to process your personal data, you must directly inform the university area that obtained your data and has your written consent and/or the write to the following email address datos.personales@udlap.mx.

Personal Data Area

UDLAP's Personal Data Area is the Legal Department at Ex Hacienda Santa Catarina Mártir S/N, San Andrés Cholula, Puebla, México, C.P. 72810, and email address datos.personales@udlap.mx, and they are authorized to advice you in exercising your rights.

Privacy Notice Changes.

UDLAP, through its Personal Data Area, reserves the right to modify at will the Policy for the Protection of Personal Data and/or its Privacy Notice. If and when this Privacy Notice is modified, UDLAP will make it public on the university webpage (www.udlap.mx/privacidad/), so we urge you to periodically visit this address to remain informed about your consent before supplying any personal data to UDLAP. Every substantial change of the Policy, other than that those derived from a Mexican legal reform or from a direct order of a relevant authority, will be published through the Institutional webpage at (www.udlap.mx) 5 calendar days before the modification enters into force.

POLICY	Fundación Universidad de las Américas, Puebla	DATE: 07/01/14	
POL-006-03	PERSONAL DATA PROTECTION	P. 19/19	ED.2.0
REVIEWED BY: Mónica Ruiz Huerta Administrative Vice President Jesús Salvador Mijangos Patiño Legal Affairs Director		AUTHORIZED BY: Dr. Luis Ernesto Derbez Bautista President	

In case this Privacy Notice was not made available to you when your personal data were obtained, you will have 5 days to manifest your refusal to process your personal data, which gave rise to a legal relationship between you and UDLAP.

Fundación Universidad de las Américas, Puebla Address

Ex Hacienda Santa Catarina Mártir S/N, San Andrés Cholula, Puebla, México, C.P. 72810

This Privacy Notice is in effect from day _____.