

Volaris Personal Data Protection Policy¹

Volaris is committed to ensuring that all those involved in the process of personal data for which Volaris is responsible comply with personal data protection legislation. Volaris has a Policy establishing each of the rules required by the data protection laws and regulations with which it is obliged to comply. Likewise, Volaris has a set of policies and manuals on the subject, in order to comply with the obligations and legislation in force related to personal data protection.

This Policy regulates the legitimate, controlled, and informed processing of all personal data that identifies or names its owner, whether they are a Volaris customer, employee, or candidate. The purpose is to guarantee the privacy and the right to informational self-determination of the holders of personal data. Volaris, committing itself to developing, implementing, maintaining and continuously improving this Policy, identifies the appropriate management of the security of the information or personal data obtained in the course of its activities in order to ensure the confidentiality, availability, and integrity of the information.

The protection of personal data is fundamental to the organization and, therefore, in order to guarantee the privacy and the right to informational self-determination of the holders of personal data, Volaris will ensure that the authorized personnel comply with the following principles:

- Principle of Legality
- Principle of Consent
- Principle of Information
- Principle of Quality
- Principle of Finality
- Principle of Loyalty
- Principle of Proportionality
- Principle of Responsibility

The data that Volaris obtains must be truthful, accurate, complete, and must identify the owner who supplies and/or provides it; therefore, it is the owner's responsibility to ensure that the data provided to Volaris complies with these characteristics and is updated as required. Likewise, Volaris reserves the right to take whatever action it deems appropriate in the event of false information.

At all times, the personnel who have direct contact with the holder of the personal data is obliged to carry out all activities aimed at a diligent and adequate confirmation of the identity of the holders. The personal information may only be disclosed to the holder when the latter has confirmed their identity to Volaris personnel in accordance with the procedures set forth in the Volaris Manual of Attention to the Rights of the Registrants.

¹This Declaration is supported by the institutionalization of the Policy: POL-COR-GSI-11 General Policy for the Protection of Personal Data.

All authorized personnel, owners, managers, database managers, and authorized third parties who process personal data for which Volaris is responsible must observe the following general guidelines:

- Making privacy notices available
- Purpose of privacy notices
- Consent of the holder
- Loyalty in treatment
- Filtering and authentication
- Creation of new databases
- Redundancy
- Supervision
- Organization

All authorized personnel, agents, and authorized third parties who process personal data for which Volaris is responsible are obliged to observe the provisions of the Personal Data Protection Charter for Authorized Persons and the following guidelines:

- Cancellation of personal data
- Blocking of personal data
- Deletion of personal data

Any communication of personal data (forwarding and/or transfer) to personal data processors and other responsible parties shall be regulated in accordance with the provisions of the *Manual of Contractual Clauses*, through a suitable legal instrument, which includes a personal data protection clause authorized by the Department of Personal Data Protection, which identifies the obligations of the parties regarding the protection of personal data. In particular, the following shall be observed in each case:

- Referrals. Through the legal counsel, the following must be complied with in order to carry out the transfer of personal data to a third party in compliance with the applicable regulations:
 - a. Regulate the transfer of personal data to the third party by means of contractual clauses or other legal instruments that will its existence, scope, and content.
 - b. Ensure that the legal instrument regulation of the transfer of personal data includes the following points:
 - i. Who are the parties to the contract, defining who is the controller and the processor.
 - ii. What is the mandate of the controller to the processor regarding the content of the services to be provided, specifically with regard to the subject of personal data.
 - iii. Which data bases will be the object of the provision.
 - iv. What security measures should be applied.
 - v. The express authorization or permission of the processor in the event of subcontracting.
 - vi. The order that, upon termination of the provision of services entrusted to the processor, the latter must return and/or destroy the data in his possession.

- c. Communicate to the processor the Privacy Notice to which the holders subjected the processing of their personal data.
- Transfers. Through the legal counsel, you must comply with the following in order to carry out the transfer of personal data to a third party, in compliance with the applicable regulations:
 - a. Inform the holders, through its Privacy Notices, about the transfer to be made.
 - b. Obtain the consent of the owners for the transfer of their personal data when this is legally required.
 - c. Provide for the transfer in a legal instrument.
 - d. Demonstrate that the transfer has been made in full.

Any communications of personal data must be necessary and required in accordance with the purposes of the processing.

The rights of the holders may only be exercised by the holder or his or her legal representative, upon proof of identity. Volaris has a Personal Data Protection Department to ensure that the rights of the holders are effectively met. The powers and functions are detailed in POL COR-GS/-12 Personal Data Protection Department Policy. The exercise of the rights of Volaris' data subjects shall be carried out in accordance with the provisions of the Data Subject Rights Attention Manual.

All authorized Volaris personnel who process personal data, as well as controllers and authorized third parties, are prohibited from receiving a request for the rights of data subjects and must immediately forward it to the Data Protection Department and/or to the email address (datos.personales@volaris.com) or (privacy@volaris.com) so that the latter may process and respond to it in accordance with the applicable regulations.

All authorized personnel, controllers, and authorized third parties who process personal data for which Volaris is responsible must maintain the necessary administrative, technical, and physical security measures to protect such personal data against any damage, loss, alteration, destruction, or unauthorized use, access or processing. At the beginning of their employment at Volaris, all authorized persons sign a Personal Data Protection Letter that establishes their obligations and responsibility with respect to the processing of personal data.

It is the responsibility of personnel, controllers, and authorized third parties with access to personal data to communicate to the Volaris Group Data Protection Department the existence of a risk or a real situation, whether their own or that of third parties, that could imply improper handling of personal data, a security breach, or any situation in which the internal policies mentioned in this document are not complied with, either by mail or in person, so that Volaris Group can take the measures established by the regulations on the matter.

The procedure for dealing with security breaches will be governed in accordance with the provisions of the POL-COR-GS/-13 Volaris Security Breaches Policy.

Volaris has taken the following actions to ensure compliance with the duty of confidentiality:

- All Volaris personnel, officers, and authorized third parties must maintain the confidentiality of the information entrusted to them and must only use this information for Company-related business, except when publication or other use is authorized in writing or by legal mandate.

- Except for the exceptions provided for in the applicable regulations, no confidential information (personal data of the holders) of Volaris may be sent abroad for any reason, neither by means of material supports, nor through any means of communication, including simple visualization or access.
- Each employee is obliged to subscribe to and enforce compliance with the contents of the Personal Data Protection Charter for Authorized Persons. The measures described are mandatory for all personnel, employees, and third parties authorized by Volaris involved in the processing of personal data, and failure to comply with them will result in the application of the appropriate contractual and administrative sanctions, depending on the potential harm detected and/or damage caused.

The following points constitute offenses attributable to the processing of personal data in accordance with the laws and regulations applicable to Volaris, as well as penalties:

- Causing a security breach with intent to profit to databases in the custody of Volaris when authorized to process personal data. This offense is punishable by imprisonment of three months to three years, and, in the case of sensitive personal data, the penalties range from six months to six years imprisonment.
- Processing personal data with the purpose of obtaining an undue profit by means of deceit, taking advantage of the error in which the owner or the person authorized to submit the data is found. This offense shall be punishable with imprisonment from six months to five years, and in the case of sensitive personal data, the penalties shall range from one year to ten years imprisonment.

Failure to comply with the provisions of this Policy may result in the sanctions provided for in applicable personal data protection laws, as well as other administrative or disciplinary sanctions in labor matters, in accordance with Volaris' internal policies.

In terms of the provisions of the applicable laws, all Ambassadors² and external suppliers that handle Volaris personal data are obliged to comply with this Policy, recognizing that any failure to comply with this Policy implies offenses attributable to the processing of personal data.

Enrique J. Beltranena Mejicano
President & Chief Executive Officer

² By Ambassador, we refer to people who work for Volaris.