

PRIVACY NOTICE FOR CUSTOMERS OF OPERADORA Y ADMINISTRADORA DE RESTAURANTES GIGANTE, S.A. DE C.V.

In compliance with the provisions of the Federal Law on the Protection of Personal Data Held by Private Parties (hereinafter the “**Law**”), its regulations (hereinafter the “**Regulations**”) and the Privacy Notice Guidelines published in the Official Gazette of the Federation on January 17, 2013, we hereby inform you of the following:

1.- PARTY RESPONSIBLE FOR THE PERSONAL DATA

Operadora y Administradora de Restaurantes Gigante, S.A. de C.V. (hereinafter the “**Company**”), designating for purposes of this Privacy Notice the address located at Av. Ejército Nacional Mexicano No. 769, Torre B, Piso 10, colonia Granada, C.P. 11520, Miguel Hidalgo, Ciudad de México, México, shall be the party responsible for the personal data provided to it with respect to the individuals to whom such data pertain (hereinafter the “**Data Subject**” or the “**Data Subjects**”).

2.- PERSONAL DATA REQUESTED FROM THE DATA SUBJECT

2.1. Personal Data Processed

For the purposes set forth in this Privacy Notice, the Company will collect the following personal data from the Data Subject: full name, date of birth, age, gender, address, email and telephone number. It will also collect the following tax data: Federal Taxpayer Registry (RFC) number, tax address and tax regime. It may also collect the image captured by the video surveillance and security cameras located at the Company’s facilities when the Data Subject visits them; information related to the device the Data Subject uses to access the wifi network at the Company’s facilities, such as IP address or device identifier, device model, operating system and version, browser type and the location at which the Data Subject connected to the wifi network; as well as their history of purchase preferences and interests related to the goods and/or services offered by the Company, its Affiliates and Third Parties (as such terms are defined in sections 5.1. and 5.2.). Such information shall hereinafter be referred to as the “**Personal Data**”.

If the Data Subject registers as a member of the Company’s loyalty program (“A Comer Club”) under the terms and conditions set forth on the website www.acomerclub.com.mx, the Company will collect, in addition to the Personal Data mentioned in the preceding paragraph: the Data Subject’s photo identification (INE voter ID, passport, professional license); if the Data Subject holds a “Corporate Membership” or “Business Membership”, in addition to the aforementioned Personal Data, the Company will collect from the Data Subject: the name of their employer and their employee number; and, if the Data Subject requests an “INAPAM Membership” or “Senior Citizen Membership”, they will be asked to provide the photo card issued by INAPAM or INSEN.

The Personal Data of Data Subjects may be collected in the following ways: (i) when the Data Subject provides them, in person or directly, and (ii) when the Company obtains them indirectly, through publicly accessible sources, including social media, or through transfers.

2.2. Use of Cookies and Other Tracking Technologies on the Website

Likewise, Data Subjects are informed that if they use the website of the Company and/or of its loyalty program “A Comer Club” (www.pandaexpress.com.mx and/or www.acomerclub.com.mx), such website (hereinafter the “**Website**”) uses “*cookies*” and other tracking technologies, including, without limitation, tracking pixels and web beacons, JavaScript tracking scripts, session replay scripts, browser fingerprinting technologies, IP address tracking and server-side tracking mechanisms, through which the following data may be obtained: IP address, geolocation, unique identifiers to facilitate specific marketing campaigns, links followed, websites visited, length of interaction time on the Website, browser type and version, device information, operating system and browsing patterns. These Personal Data are collected in a generalized manner, with the main purpose of statistical analysis of the use of the Website and optimizing its design, functionality and performance on the different devices from which the Website is visited. Additionally, the Company may incorporate codes or other identifiers into the Website’s first-party cookie or

through tracking technologies that allow Personal Data to be used for online advertising and across different digital channels. These Personal Data may be transferred under the terms set forth in section 5 of this Privacy Notice in order to enable interest-based content or targeted advertising throughout the Data Subject's digital experience (for example, on websites, emails, connected devices and mobile applications).

The Data Subject may at any time disable or restrict the use of cookies through the settings of the browser used to visit the Website, in its cookies, privacy and/or security sections. Browsers allow users to manage how cookies are configured and used while browsing the Website, as well as to delete cookies and data after browsing.

Disabling cookies does not prevent browsing the Website; however, it may affect some of the Website's functionalities, so optimal performance is not guaranteed if the Data Subject decides to block them totally or partially.

3.- PURPOSES FOR WHICH PERSONAL DATA ARE COLLECTED

3.1. Primary Purposes. The Data Subject's Personal Data are processed by the Company for the following purposes, which are necessary to fulfill the obligations arising from the legal relationship between the Company and the Data Subject: (i) to identify the Data Subject; (ii) to safeguard the Data Subject's Personal Data; (iii) the sale of goods and/or provision of services offered by the Company through its branches and/or Website and/or mobile application ("app") and/or "call center"; (iv) to deliver to the Data Subject the goods and/or services purchased and/or contracted from the Company (including home deliveries); (v) to issue the corresponding invoice for the goods and/or services purchased by the Data Subject, when so requested; (vi) to enroll the Data Subject in the "A Comer Club" loyalty program, when so requested, provide the benefits derived from such membership and send the statement of their points activity, in accordance with the applicable terms and conditions; (vii) to allow the Data Subject to connect to the wifi network at the Company's branches; and (viii) to promptly address the Data Subject's complaints, claims, requests and/or suggestions, as well as to follow up on the goods and/or services purchased from the Company.

With respect to the image of Data Subjects captured by the video surveillance and security cameras located at the Company's facilities, it will be used for the purpose of identifying the Data Subject, safeguarding their data, maintaining the security of the Company's facilities, as well as of the Data Subject, customers, employees, suppliers and other persons present at the Company's facilities, and to protect the Company's assets.

3.2. Secondary Purposes. Likewise, the uses the Company will make of the Data Subject's Personal Data include: (i) carrying out profiling activities and identifying and getting to know customers of the Company, its Affiliates and/or Third Parties (as such terms are defined in sections 5.1. and 5.2.) through the integration and generation of customer profiles by applying various data analysis technologies; (ii) informing the Data Subject of promotions, purchases with benefits and/or discounts, as well as openings of new locations of the Company, its Affiliates and/or Third Parties; (iii) providing the Data Subject with advertising regarding the products and/or services offered by the Company, its Affiliates and/or Third Parties; (iv) inviting the Data Subject to participate in events, contests, sweepstakes and activities and, where applicable, delivering the corresponding prize, in accordance with the applicable terms and conditions; (v) contacting the Data Subject through various physical or electronic means of communication and through social media and, where applicable, addressing their requests through such means; (vi) identifying the Data Subject's consumption habits and carrying out personalized commercial prospecting activities in accordance with their interests and consumption preferences; and (vii) developing and improving the products and services of the Company, its Affiliates and/or Third Parties by evaluating their quality, including conducting surveys, as well as collecting information for the purposes of this section (the "Secondary Purposes").

The Secondary Purposes referred to in this section 3.2 are not necessarily required to fulfill the obligations arising from the legal relationship between the Company and the Data Subject; therefore, if the Data Subject does not agree to the Company processing their Personal Data for any or all of the Secondary Purposes, the Data Subject may, at any time, object to or revoke their consent for their Personal Data to be processed for any of such Secondary Purposes, following the procedure set forth in section 6 of this Privacy Notice.

When the Company does not make this Privacy Notice known to Data Subjects directly or personally, but indirectly, Data Subjects may express their objection to the processing of their Personal Data that the Company intends to use for Secondary Purposes, which objection must be expressed in accordance with section 6 of this Privacy Notice; if Data Subjects do not express their objection, they shall be deemed to have granted their consent to the Company for these purposes.

4.- RETENTION PERIOD FOR THE PROCESSING OF PERSONAL DATA

The period during which Data Subjects' Personal Data are handled shall not exceed the retention period necessary for (i) fulfilling the purposes set forth in this Privacy Notice, and (ii) complying with the obligations required by current legislation and the competent authorities; however, with respect to the Personal Data corresponding to the image of Data Subjects captured by the video surveillance cameras at the Company's facilities, such information is retained by the Company only for a maximum period of 90 calendar days after the date on which it is obtained (unless it is necessary to retain it for a longer period under applicable law or at the request of a competent authority), and once such period has elapsed, it is deleted. Once the purpose(s) of the processing of the Personal Data have been fulfilled, and provided there is no legal or regulatory provision to the contrary, the Company will cancel the Personal Data after their Blocking [1] for their subsequent Deletion [2].

The information provided to the Company will be safeguarded, retained and protected by the Company in accordance with current legislation in order to maintain the confidentiality of such information.

5.- TRANSFERS OF PERSONAL DATA

5.1. Transfers of Personal Data not subject to the Data Subject's consent. The Company may transfer the Personal Data indicated in section 2 of the Privacy Notice:

(a) To its affiliates, subsidiaries, parent company and/or companies belonging to the same control group as the Company (hereinafter and collectively the "**Affiliates**"), so that the Affiliates may: (i) identify the Data Subject and safeguard their Personal Data; (ii) carry out profiling activities and identify and get to know customers and their consumption habits through the integration and generation of customer profiles by applying various data analysis technologies; (iii) carry out commercial prospecting activities and contact the Data Subject and send them advertising, promotional and/or informational material of the Company, its Affiliates and/or Third Parties; (iv) carry out research and development of new business lines; (v) conduct marketing campaigns, as well as statistics, surveys and studies on consumption habits in relation to the goods and/or services offered by the Company, its Affiliates and/or the Third Parties; (vi) transfer the Personal Data to their affiliates, subsidiaries and/or companies belonging to the same control group; and (vii) transfer the Personal Data to the Third Parties.

(b) If the safeguarded Personal Data are required by an authority of any kind or must be delivered to such authority in accordance with current legislation, such data will be made available to it in strict compliance with the Law.

The transfers of Personal Data referred to in this section 5.1 do not require the consent of the Data Subjects, in accordance with article 36 of the Law.

5.2. Transfers of Personal Data subject to the Data Subject's consent. If the Data Subject's consent is obtained under the terms of this section 5.2, the Company may transfer the Personal Data indicated in section 2 of the Privacy Notice to: (i) Mascotas y Compañía, S.A.P.I. de C.V., (ii) Matriz Ideas Mex, S.A.P.I. de C.V., (iii) Inmobiliaria Conjunto Polanco, S.A.P.I. de C.V., (iv) Citadel Panda Express, Inc., and its affiliates, and (v) the companies that are part of "Grupo Presidente" (hereinafter and collectively the "**Third Parties**"), so that the Third Parties may: (i) identify the Data Subject and safeguard their Personal Data; (ii) carry out profiling activities and identify and get to know customers and their consumption habits through the integration and generation of customer profiles by applying various data analysis technologies; (iii) carry out commercial prospecting activities and contact the Data Subject and send them advertising, promotional and/or informational material of the Company, its Affiliates and/or the Third Parties; (iv) carry out research and development of new business lines, and (v) conduct marketing campaigns, as well as statistics, surveys and studies on consumption habits in relation to the goods and/or services offered by the

Company, its Affiliates and/or the Third Parties; (vi) transfer the Personal Data to their affiliates, subsidiaries and/or companies belonging to the same control group; and (vii) transfer the Personal Data to the Affiliates.

If Data Subjects do not agree to the Company transferring their Personal Data to the Third Parties under the terms and for the purposes described in this section 5.2, they may express their objection by following the procedure set forth in section 6 of this Privacy Notice; if Data Subjects do not express their objection, they shall be deemed to have granted their consent to the Company for these purposes.

6.- RIGHTS OF ACCESS, RECTIFICATION, CANCELLATION AND OBJECTION, REVOCATION OF CONSENT AND LIMITATION OF THE USE OR DISCLOSURE OF PERSONAL DATA.

Data Subjects shall have the right to request access to, rectification and/or cancellation of their Personal Data, as well as to object to their processing for specific purposes, revoke their consent and limit the use or disclosure of their Personal Data, by sending a free-form written request to the following email address: gpo_privacidad@pandaexpress.com.mx, which will be handled by the Company's Personal Data Department.

The Company will respond to the Data Subject's requests provided that none of the exceptions set forth in the Law apply.

In order for the Company to process a Data Subject's request regarding access, rectification, revocation of consent, cancellation, objection and/or limitation of the use or disclosure of their Personal Data, the Data Subject must attach the following information and documentation to their request:

- (i) Name, address and email or other means through which the Company may communicate the response to their request.
- (ii) Documents evidencing their identity or, where applicable, the legal capacity and identity of their legal representative.
- (iii) A clear and precise description of the Personal Data with respect to which the Data Subject seeks to exercise the right of rectification, cancellation, objection, revocation of consent and/or limitation of use or disclosure, as well as any other information or document that may facilitate locating the Personal Data.
- (iv) When requesting a rectification of Personal Data, the modifications to be made must be indicated, providing documentation supporting the request.

The Company will respond to a Data Subject's request regarding access, rectification, cancellation, objection, revocation of consent and/or limitation of the use or disclosure of their Personal Data within the periods established in the Law, that is, within 20 business days from the date it receives the Data Subject's request and, if the request is admissible, it will be implemented within 15 business days after the response is communicated to the Data Subject; these periods may be extended by the Company in accordance with article 31 of the Law.

The obligation of access to information shall be deemed fulfilled by the Company when, if so requested by the Data Subject, their Personal Data are made available to them in simple copy at the Company's address during the 15 business days following the communication of the response to their request, or through any of the means established in article 32 of the Law, which will be notified to the Data Subject in the response to their request.

7.- AMENDMENTS TO THE PRIVACY NOTICE

In the event that the Company changes its identity, needs to use the Personal Data for purposes other than those set forth in this Privacy Notice, or requires from the Data Subject Personal Data other than those indicated in this Privacy Notice and/or intends to make transfers of Personal Data other than those indicated in this Privacy Notice, the Data Subject will be notified in writing, by telephone, electronically (including by email), or by any optical, audio, visual or other means that technology allows, now or in the future, explaining, where applicable, the new uses intended for such information, in order to obtain their consent when required under the Law. With this Privacy Notice, Data Subjects are duly informed of the Personal Data collected from them and for what purposes, as well as of the fact that the Privacy Notice may be consulted at any time on the Company's website: www.pandaexpress.com.mx and in the app.

The Company reserves the right to make any change or update to this Privacy Notice other than those set forth in the preceding paragraph, including to adapt it to legislative and/or case-law developments. In such cases, the relevant changes will be communicated to Data Subjects through the publication of the updated Privacy Notice on the website www.pandaexpress.com.mx and in the app.

This Privacy Notice, as well as the processing of Personal Data carried out by the Company, is governed by the laws in force and applicable in the United Mexican States; any dispute arising from its application shall be heard before the Ministry of Anti-Corruption and Good Governance (Secretaría Anticorrupción y Buen Gobierno) and/or before the competent Courts in Mexico City, Mexico.

The Data Subject acknowledges having read and consented to this Privacy Notice, authorizing the Company to process their Personal Data in accordance with the terms and conditions set forth herein.

Last updated: October 1, 2026.

[1] Article 2 of the Law defines Blocking as: The identification and retention of personal data once the purpose for which they were collected has been fulfilled, for the sole purpose of determining possible liabilities in relation to their processing, until the legal or contractual statute of limitations for such liabilities expires. During such period, the personal data may not be processed and, once it has elapsed, they shall be cancelled in the corresponding database.

[2] Article 2 of the Regulations defines Deletion as: The activity consisting of eliminating, erasing or destroying the personal data, once the blocking period has concluded, under the security measures previously established by the data controller.