



# CNBV - Securities Market Law and the General Provisions Applicable for Brokerage Houses

## Google Cloud Mapping

This document is designed to assist financial institutions supervised by the Comisión Nacional Bancaria y de Valores (“**regulated entity**”) to consider the Securities Market Law (Ley del Mercado de Valores; the “**LMV**”) and the General provisions applicable for brokerage houses (Disposiciones de Carácter General Aplicables a las Casas de Bolsa; the “**CUCB**”), (the “**frameworks**”) in the context of Google Cloud Platform (“**GCP**”) and the Google Cloud Financial Services Contract.

We focus on the requirements of the frameworks: Article 219 to 223 of the Securities Market Law and Articles 205-206 of the CUCB. For each paragraph, we provide commentary to help you understand how you can address the requirements using the Google Cloud services and the Google Cloud Financial Services Contract.

#	Framework reference	Google Cloud commentary	Google Cloud Financial Services Contract reference
<b>LMV</b>			
1.	<i>Outsourcing of services</i>		
2.	Article 219, Firms may outsource services to carry out their activities, provided that they obtain previous authorization from the Regulator ( <i>Comisión Nacional Bancaria y de Valores; “CNBV”</i> ) (i.e. CUCB), and subject to general provisions issued by the Regulator.	Refer to Rows 27 to 76 on CUCB.	N/A
3.	Article 219, The Regulator must establish, through general provisions (i.e. CUCB), the services that may be subject to outsourcing, as well as those that, due to their lack of relevance to the purpose of the Firm, will not require authorization.	This is a customer consideration.	N/A
4.	<i>Authorization requirements</i>		
5.	Article 220, Firms that intend to obtain the authorization for outsourcing of services, must comply with the following requirements:		
6.	Article 220, I. Submit a report to the Regulator specifying the services to be outsourced and their risks, as well as the criteria and procedures for selecting the third-party provider. Such criteria and procedures shall be aimed at evaluating the technical, financial and human resources capacity of the third party, to provide the service with adequate levels of performance, reliability and safety. Firms must keep available for the Regulator to review the documentation evidencing the selection procedure used.	<p><u>Services to be outsourced</u></p> <p>The GCP services are described on our <a href="#">services summary</a> page. You decide which services to use, how to use them and for what purpose. Therefore, you decide the scope of the arrangement.</p> <p><u>Criteria and procedures for selection</u></p> <p>Google recognizes that you need to conduct due diligence and perform a risk assessment before deciding to use our services. To assist you, we’ve provided the information below.</p> <p><u>Technical capacity</u></p> <ul style="list-style-type: none"> <li>Information on Google Cloud’s capabilities is available on our <a href="#">Choosing Google Cloud</a> page.</li> </ul>	Definitions



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		<ul style="list-style-type: none"> <li>Google Cloud has been named as a leader in several reports by third party industry analysts. You can read these on our <a href="#">Analyst Reports</a> page.</li> </ul> <p><u>Financial capacity</u></p> <ul style="list-style-type: none"> <li>You can review Google's corporate and financial information on <a href="#">Alphabet's Investor Relations</a> page.</li> </ul> <p><u>Human resources</u></p> <ul style="list-style-type: none"> <li>Information about Google Cloud's leadership team is available on our <a href="#">Media Resources</a> page.</li> <li>Google employs some of the world's foremost experts in information, application and network security.</li> </ul> <p><u>Service delivery</u></p> <ul style="list-style-type: none"> <li>Google Cloud has been providing cloud services for over 10 years, assisting customers across the globe in the financial services, healthcare &amp; life science, retail and public sectors to name a few. More information on Google Cloud's capabilities is available on our <a href="#">Choosing Google Cloud</a> page.</li> <li>Information about our referenceable customers (including in the financial services sector) is available on our <a href="#">Google Cloud Customer</a> page.</li> </ul>	
7.	Article 220, II. Have in place policies and procedures to supervise the performance of the third-party provider and the compliance with its contractual obligations, which policies must include aspects related to:		
8.	a) The quantity, quality and costs of the outsourced services, specifying performance goals and ways to measure them.	<p><u>Fees</u></p> <p>Refer to your Google Cloud Financial Services.</p> <p><u>Monitoring</u></p> <p>The SLAs provide measurable performance standards and remedies for the services and are available on our Google Cloud Platform <a href="#">Service Level Agreements</a> page.</p> <p>You can monitor Google's performance of the Services (including the SLAs) on an ongoing basis using the functionality of the Services.</p> <p>For example:</p>	<p>Payment Terms</p> <p>Services</p> <p>Ongoing Performance Monitoring</p>



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		<ul style="list-style-type: none"> <li>• The <a href="#">Status Dashboard</a> provides status information on the Services.</li> <li>• <a href="#">Google Cloud Operations</a> is an integrated monitoring, logging, and diagnostics hosted solution that helps you gain insight into your applications that run on GCP.</li> <li>• <a href="#">Access Transparency</a> is a feature that enables you to review logs of actions taken by Google personnel regarding your data. Log entries include: the affected resource, the time of action, the reason for the action (e.g. the case number associated with the support request); and data about who is acting on data (e.g. the Google personnel's location).</li> </ul>	
9.	b) The restrictions or conditions, regarding the possibility that the service provider subcontracts, in turn, the provision of the service.	<p>Google recognizes that regulated entities need to consider the risks associated with subcontracting. We also want to provide you and all our customers with the most reliable, robust and resilient service that we can. In some cases there may be clear benefits to working with other trusted organizations e.g. to provide 24/7 support.</p> <p>To enable regulated entities to retain oversight of any subcontracting and provide choices about the services regulated entities use, Google will:</p> <ul style="list-style-type: none"> <li>• provide information about our subcontractors;</li> <li>• provide advance notice of changes to our subcontractors; and</li> <li>• give regulated entities the ability to terminate if they have concerns about a new subcontractor.</li> </ul> <p>Google will oversee the performance of all subcontracted obligations and ensure our subcontractors comply with our contract with you.</p>	Google Subcontractors
10.	c) The confidentiality and security of the clients' information and their account.	<p>This is addressed in the <a href="#">Cloud Data Processing Addendum</a> where Google makes commitments to protect your data, including regarding security, deletion, access and transfer.</p> <p>The confidentiality and security of a cloud service consists of two key elements:</p> <p>(1) <a href="#">Google's infrastructure</a></p>	Confidentiality Data Security; Security Measures ( <a href="#">Cloud Data Processing Addendum</a> )



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		<p>Google manages the security of our infrastructure. This is the security of the hardware, software, networking and facilities that support the Services.</p> <p>Given the one-to-many nature of our service, Google provides the same robust security for all our customers. This is described in the <a href="#">Cloud Data Processing Addendum</a>.</p> <p>Google provides detailed information to customers about our security practices so that customers can understand them and consider them as part of their own risk analysis.</p> <p>More information is available at:</p> <ul style="list-style-type: none"><li>• Our <a href="#">infrastructure security</a> page</li><li>• Our <a href="#">security whitepaper</a></li><li>• Our <a href="#">cloud-native security whitepaper</a></li><li>• Our <a href="#">infrastructure security design overview</a> page</li><li>• Our <a href="#">security resources</a> page</li></ul> <p>In addition, you can review Google's <a href="#">SOC 2 report</a>.</p> <p><u>(2) Security of your data and applications in the cloud</u></p> <p>You define the security of your data and applications in the cloud. This refers to the security measures that you choose to implement and operate when you use the Services.</p> <p><u>(a) Security by default</u></p> <p>Although we want to offer you as much choice as possible when it comes to your data, the security of your data is of paramount importance to Google and we take the following proactive steps to assist you:</p> <ul style="list-style-type: none"><li>• <b>Encryption at rest.</b> Google encrypts customer data stored at rest by default, with no additional action required from you. More information is available at: <a href="https://cloud.google.com/security/encryption-at-rest/default-encryption">https://cloud.google.com/security/encryption-at-rest/default-encryption</a>.</li><li>• <b>Encryption in transit.</b> Google encrypts and authenticates all data in transit at one or more network layers when data moves outside physical boundaries not controlled by Google or on behalf of Google. More information is available at <a href="https://cloud.google.com/security/encryption-in-transit">https://cloud.google.com/security/encryption-in-transit</a>.</li></ul> <p><u>(b) Security products</u></p>	
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		<p>In addition to the other tools and practices available to you outside Google, you can choose to use tools provided by Google to enhance and monitor the security of your data. Information on Google's security products is available on our <a href="#">Cloud Security Products</a> page.</p> <p>(c) <a href="#">Security resources</a></p> <p>Google also publishes guidance on:</p> <ul style="list-style-type: none"> <li>• <a href="#">Security best practices</a></li> <li>• <a href="#">Security use cases</a></li> </ul>	
11.	d) The responsibilities of the Firm and the third-party provider, the procedures to supervise compliance with such responsibilities, as well as the guarantees and indemnities in case of non-compliance.	<p>If Google's performance of the Services does not meet the <a href="#">Google Cloud Platform Service Level Agreements</a> regulated entities may claim service credits.</p> <p>Refer to Row 8 for information on how you can monitor Google's performance of the Services.</p>	Services
12.	e) The commitment of the third party to provide, at the request of the Firm, the records, information and technical support regarding the outsourced services provided to the Firm, its auditors and supervisors.	Google recognizes that regulated entities and their supervisory authorities must be able to audit our services effectively. Google grants audit, access and information rights to regulated entities, supervisory authorities and both their appointees.	Regulator Information, Audit and Access; Customer Information, Audit and Access
13.	f) The mechanisms for the solution of disputes related to the services agreement.	Refer to your Google Cloud Financial Services Contract.	Governing Law
14.	g) The measures to ensure the continuity of the business, as well as the contingency procedures that include a recovery plan in case of disaster.	<p>Google will implement a disaster recovery and business contingency plan for our services, review and test it at least annually and ensure it remains current with industry standards. Regulated entities can review our plan and testing results.</p> <p>In addition, information about how customers can use our Services in their own contingency planning is available in our <a href="#">Disaster Recovery Planning Guide</a>.</p>	Business Continuity and Disaster Recovery
15.	h) In the event that the third-party provider is located abroad, such provider must accept in writing, to abide by the provisions of the LMV.	Google will comply with all laws, regulations and binding regulatory guidance applicable to it in the provision of the Services.	Representations and Warranties
16.	Article 220, III. Have in place plans to evaluate and report to the Board of Directors the performance of the third-party provider, as well as the compliance with applicable regulations related to the outsourced service.	<p>This is a customer consideration.</p> <p>For information on how you can monitor Google's performance of the Services, refer to Row 8.</p>	N/A
17.	Article 220, The Board of Directors will be responsible for approving and verifying the compliance with the policies and criteria of third-party provider selection, as well as the services that are provided and activities that are carried out pursuant to such policies and criteria.	This is a customer consideration.	N/A



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18.	Article 220, The CEO will be responsible for the implementation of said policies and criteria.	This is a customer consideration.	N/A
19.	<i>Compliance</i>		
20.	Article 221, Outsourcing of services shall not release the Firms or their directors, officers or employees, of their obligations to comply with the applicable regulation.	This is a customer consideration.	N/A
21.	Article 221, Secrecy provisions shall be extended to third parties providing outsourcing services.	Refer to Row 10 for information about secrecy and confidentiality.	N/A
22.	Article 221, The Regulator may request the third-party providers, information, including books, records and documents related to the outsourced services, as well as to conduct inspection visits and order measures to be implemented by the Firms to ensure the continuity the continuity of services provided by the Firms to their clients, the information integrity and compliance to provisions of the LMV.	<p><u>Access by supervisory authorities</u></p> <p>Google recognizes that regulated entities must be able to audit our services effectively. Google grants audit, access and information rights to regulated entities, supervisory authorities, and both their appointees. This includes access to Google's premises used to provide the Services to conduct an on-site audit. Regulated entities may access their data on the services at any time and may provide their supervisory authority with access.</p> <p><u>Audit reports</u></p> <p>Google recognizes that you expect independent verification of our security, privacy and compliance controls. Google undergoes several independent third-party audits on a regular basis to provide this assurance. Google commits to comply with the following key international standards during the term of our contract with you:</p> <ul style="list-style-type: none"> <li>• <a href="#">ISO/IEC 27001:2013 (Information Security Management Systems)</a></li> <li>• <a href="#">ISO/IEC 27017:2015 (Cloud Security)</a></li> <li>• <a href="#">ISO/IEC 27018:2014 (Cloud Privacy)</a></li> <li>• <a href="#">PCI DSS</a></li> <li>• <a href="#">SOC 1</a></li> <li>• <a href="#">SOC 2</a></li> </ul> <p>You can review Google's current <a href="#">certifications and audit reports</a> at any time. <a href="#">Compliance reports manager</a> provides you with easy, on-demand access to these critical compliance resources.</p>	<p>Regulator Information, Audit and Access Customer Information, Audit and Access</p> <p>Certifications and Audit Reports</p>
23.	<i>Services agreement</i>		
24.	Article 222, The provision of services shall be governed by an agreement executed between the Firm and the third-party provider, in which the rights and obligations of the parties must be specified.	The rights and obligations of the parties are set out in the Google Cloud Financial Services Contract.	N/A
25.	<i>Minimum requirements for services agreement</i>		



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26.	Article 223, The Regulator may issue general provisions regarding the minimum aspects that the agreements executed with third-parties shall contain (CUCB).	<p>Google recognizes that regulated entities require assistance from Google to enable them to ensure compliance with applicable laws and regulations. We are committed to working with regulated entities in good faith to provide this assistance.</p> <p>In particular, we appreciate that you will need to have confidence that the Google Cloud Financial Services Contract continues to support your compliance requirements. We are committed to working with you throughout our relationship to address the impact of changes in law or regulation.</p>	Enabling Customer Compliance
<b>CUCB (applicable to Brokerage Firms)</b>			
27.	<i>Outsourcing of services</i>		
28.	Article 205, Firms may hire third parties, including other brokerage firms or national or foreign financial entities, to provide services necessary to carry out their activities.	This is a customer consideration.	N/A
29.	Article 205, Services related to any operational or technological process that contemplates the transmission, storage, processing, safekeeping and custody of information, or the database administration of the Firm or its clients, will be deemed authorized as set forth in Article 219 of the LMV, provided that they comply with the provisions herein.	See Rows 1 to 26 above on the Securities Market Law.	N/A
30.	Article 205, Firms must keep the data of the third-party providers in the register referred to in Article 206 Bis 5 of the CUCB.	This is a customer consideration.	N/A
31.	<i>Specific requirements</i>		
32.	Article 206, Firms that intend to hire a third party to provide services directly related to an operational or technological process that contemplates the transmission, storage, processing, safekeeping and custody of information, or the database administration of the Firm or its clients, must comply with the following requirements:		
33.	Article 206, I. The third-party providers will always act in the name on behalf of the Firm, whenever they must act with the general public.	Given the nature of the services Google does not have direct interaction with the regulated entity's customers.	N/A
34.	Furthermore, in no case, shall such third-party providers open accounts outside the offices or modules of the Firm.	<p>You operate the services independently without action by Google personnel. You decide which services to use, how to use them and for what purpose. Therefore you stay in control of the relevant activities.</p> <p>Regulated entities can use the following functionality to control the Services:</p> <ul style="list-style-type: none"> <li>• <a href="#">Cloud Console</a>: A web-based graphical user interface that customers can use to manage their GCP resources.</li> </ul>	Instructions



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		<ul style="list-style-type: none"> <li>• <a href="#">gcloud Command Tool</a>: A tool that provides the primary command-line interface to GCP. A command-line interface is a user interface to a computer's operating system.</li> <li>• <a href="#">Google APIs</a>: Application programming interfaces which provide access to GCP.</li> </ul>	
35.	Article 206, II. Produce a report that specifies the operational, technological or database administration processes of the Firm that are the subject matter of the services to be outsourced, according to paragraph I of Article 220 of the LMV, as well as the effects that may be produced in one or more operations carried out by the Firm.	The GCP services are described on our <a href="#">services summary</a> page. You decide which services to use, how to use them and for what purpose. Therefore, you decide the scope of the arrangement.	Definitions
36.	Article 206, III. Include in the services agreement or any other ancillary document the unconditional acceptance of the third-party provider to:		
37.	a) Receive supervisory visits from the Firm's external auditor and the Regulator, with the exclusive purpose of obtaining information to verify that the outsourced services allow the Firm to comply with the applicable provisions of the LMV. The Firm may appoint a representative to carry out said visits.	Google recognizes that regulated entities and their supervisory authorities must be able to audit our services effectively. Google grants audit, access and information rights to regulated entities, supervisory authorities and both their appointees. This includes access to Google's premises used to provide the Services to conduct an on-site audit.	Regulator Information, Audit and Access; Customer Information, Audit and Access
38.	b) Conduct audits, by the Firm or through third parties appointed by the Regulator, in connection with the outsourced services, in order to verify compliance with the regulatory provisions applicable to the Firms.	Refer to Row 37 above.	N/A
39.	c) Deliver upon request of the Firm, to the Firm's external auditor and to the Regulator or any third party designated by the Regulator, all books, systems, records, manuals and documents in general, related to the provision of the relevant service. Also allow access to the responsible staff and to its offices and premises in general, related to the provision of the relevant service.	Refer to Row 37 above.	N/A
40.	All information requirements, observations and corrective measures that derive from the supervision activities carried out by the Regulator, will be made directly to the Firm. Furthermore, the Regulator may, at any time, order the performance of the visits and audits indicated in paragraphs a) and b) above, indicating any and all aspects to be contemplated therein, and the Firm must submit to the Regulator a report thereof	Refer to Row 37 above.	N/A
41.	Article 206, IV. In addition to what Article 220, paragraph II of the LMV provides for, the policies and procedures to supervise the performance of the third-party provider and the fulfillment of its contractual obligations must contain aspects related to:		
42.	a) The Firm's ownership over the databases resulting from the services.	You retain all intellectual property rights in your data, the data you derive from your data using our services and your applications.	Intellectual Property



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43.	b) The guidelines to ensure that the third-party provider periodically receives training and information relating to the outsourced services.	Regulated entities can operate the services independently without action by Google personnel. Google provides <a href="#">documentation</a> to explain how customers and their employees can use our services. If a customer would like more guided training, Google also provides a variety of <a href="#">courses and certifications</a> .	N/A
44.	c) Compliance with the minimum operational and safety guidelines indicated in Exhibit 12 of the CUCB, if the services to be outsourced refer to the use of technological infrastructure or telecommunications.	Refer to Row 10 for information on the security of the services, including regarding the security measures that you choose to implement and operate when you use the Services.	N/A
45.	Article 206, V. Regarding information processing services, contemplate within the evaluation plans and in the third-party provider performance report, that once every two years, the Firm must conduct an audit to the third-party providers that is intended to verify the degree of compliance with this requirements, as well as the provisions of Exhibit 12 of the CUCB. Notwithstanding the foregoing, the Regulator may order the performance of such audit at any time, when the Regulator considers that there are risk conditions regarding operation and information security.	Refer to Row 8 for information about how you can monitor Google's performance of the services.  Refer to Row 37 for information about the audit, access and information rights that Google grants to regulated entities and their appointees. The regulated entity is best placed to decide what audit frequency and scope is right for their organization. Our contract does not limit regulated entities to a fixed number of audits or a pre-defined scope.	N/A  Customer Information, Audit and Access
46.	Article 206, V. The Firm's Board of Directors may set forth in the plans referred to in section III of article 220 of the LMV, depending on the materiality of the outsourced service, the cases in which the performance of the third-party provider may be reported to the Audit Committee, as well as compliance with applicable regulations related to such service. The aforementioned performance evaluation and reporting plans may establish the cases in which the foregoing should be reported to the CEO.	This is a customer consideration.	N/A
47.	Article 206, VI. Provide that the CEO, the Audit Committee, as well as the responsible person for the audit functions and the responsible person for the internal control functions, according to their competencies, assist in the compliance of the mechanisms for the proper management, control and security of the information generated, received, transmitted, processed or stored in the execution of the services that refer to the use of technological infrastructure, telecommunications or information processing, which are carried out partially or totally outside of Mexico.	Refer to Row 10 for information on Google's security practices, including regarding the security measures that you choose to implement and operate when you use the Services.	N/A
48.	<i>Significant services notification to the Regulator</i>		
49.	Article 206 Bis, The Firm must notify the Regulator, prior to hiring a third party, other brokerage firms or financial entities, to provide services for carrying out an operational,		



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	technological or database administration process, when in the judgment of the CEO of the Firm, such services have a significant importance, qualitatively or quantitatively, in the carrying out of one or more of the operations performed by the Firm according to their purpose, considering, among others, the following:		
50.	Article 206 Bis, I. The difficulty of the Firm to maintain operational continuity and to carry out operations and services with its clients in case of contingency.	Google recognizes that resilience (including operational continuity) is a key focus for regulated entities and supervisory authorities. Our <a href="#">Strengthening operational resilience in financial services by migrating to Google Cloud</a> whitepaper discusses the continuing importance of operational resilience to the financial services sector, and the role that a well-executed migration to Google Cloud can play in strengthening it.	N/A
51.	Article 206 Bis, II. The complexity and timing required to find a third party that, if necessary, replaces the original third-party provider.	<p>Google is committed to addressing customers' needs for portability and interoperability. In particular, Google believes in an open cloud that supports multi-cloud and hybrid cloud approaches. If implemented through the use of open-source based technologies, these approaches can provide customers with the levels of portability, substitutability and survivability, required for robust exit planning. Refer to our <a href="#">Strengthening operational resilience in financial services by migrating to Google Cloud</a> whitepaper for more information.</p> <p>We will enable you to access and export your data throughout the duration of our contract and during the post-termination transition term. You can export your data from the Services in a number of industry standard formats. For example:</p> <ul style="list-style-type: none"> <li>• <a href="#">Google Kubernetes Engine</a> is a managed, production-ready environment that allows portability across different clouds as well as on premises environments.</li> <li>• <a href="#">Migrate for Anthos</a> allows you to move and convert workloads directly into containers in Google Kubernetes Engine.</li> <li>• You can export/import an entire VM image in the form of a .tar archive. Find more information on images and storage options on our <a href="#">Compute Engine Documentation</a> page.</li> </ul> <p>Google recognizes that regulated entities need sufficient time to exit our services (including to transfer services to another service provider). To help regulated entities achieve this, upon request, Google will continue to provide the services for 12 months beyond the expiry or termination of the contract.</p>	<p>Data Export (<a href="#">Cloud Data Processing Addendum</a>)</p> <p>Transition Term</p>
52.	Article 206 Bis, III. Any limitation in the decision-making process that materially impacts the administrative, financial, operational or legal situation of the Firm.	You operate the services independently without action by Google personnel. You decide which services to use, how to use them and for what purpose. Therefore you stay in control of the relevant activities.	Instructions



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		<p>Regulated entities can use the following functionality to control the Services:</p> <ul style="list-style-type: none"> <li>• <a href="#">Cloud Console</a>: A web-based graphical user interface that customers can use to manage their GCP resources.</li> <li>• <a href="#">gcloud Command Tool</a>: A tool that provides the primary command-line interface to GCP. A command-line interface is a user interface to a computer's operating system.</li> <li>• <a href="#">Google APIs</a>: Application programming interfaces which provide access to GCP.</li> </ul>	
53.	Article 206 Bis, IV. The inability of the Firm to maintain appropriate internal controls and timeliness of the accounting recording, and to comply with regulatory requirements in case of suspension of the service by the third-party provider.	Google recognizes that regulated entities must plan for situations where their providers are unable, for any reason, to provide the services contracted. Refer to Row 51 for information about portability and interoperability when using our services.	N/A
54.	Article 206 Bis, V. The impact that any suspension of the service would have on the financing situation, reputation and operations of the Firm.	This is a customer consideration.	Representations and Warranties
55.	Article 206 Bis, VI. The vulnerability of information related to customers.	Refer to Row 10 for information on Google's security practices, including regarding the security measures that you choose to implement and operate when you use the Services.	N/A
56.	Article 206 Bis, The notice referred to above must specify the operational, technological or database administration process that is the subject matter of the services to be outsourced and must be delivered to the Regulator at least 20 business days in advance to the date on which the Firm intends to hire such services.	This is a customer consideration	N/A
57.	Article 206 Bis, The Regulator, in protection of the interests of the public users and in its capacity as supervisory authority, within 20-day term indicated in the preceding paragraph, will have the power to require the Firm that such service is not performed through the third-party provider indicated in the notice, if the Regulator considers that taking according to the terms and conditions of service contract, or the internal control policies and procedures, it is foreseeable that the technological infrastructure or communications would not be able to comply with the provisions applicable to the Firm, or the financial stability or operational continuity of the Firm may be affected, in the opinion of the Commission.	This is a customer consideration.	N/A
58.	Article 206 Bis, If the Regulator does not formulate such requirement in writing within the aforementioned term, the hiring of the third party to provide the service shall be deemed authorized in accordance with article 219 of the Law.	This is a customer consideration	N/A
59.	<i>Notification formalities</i>		



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60.	Article 206 Bis 1, Article 206The notification referred to in Article 206 Bis 1 must be signed by the Firm's CEO and must include:		
61.	Article 206 Bis 1, I. The report referred to in Article 220, paragraph I of the LMV. If the services to be outsourced relate to the use of technological or telecommunications infrastructure, the notification must also include a technical report specifying the type of transactions or services to be executed using the technological platform provided by the third party and explaining how minimum operational and security requirements will be complied with.	Refer to Row 10 for information on Google's security practices, including regarding the security measures that you choose to implement and operate when you use the Services.	N/A
62.	Article 206 Bis 1, II. A draft of the services agreement, indicating the estimated date of execution.	Where relevant regulated entities may disclose a copy of the contract to their supervisory authority.	Enabling Customer Compliance; Information
63.	<i>Services to be rendered abroad of by foreigners</i>		
64.	Article 206 Bis 2, When hiring a third party to perform any operational, technological or databases administration process, if the relevant services were to be rendered or executed partially or totally outside Mexico of by foreign residents, regardless of whether the relevant processes may or may not affect in a qualitative or quantitative manner one or more of the operations that the Firm performs, such Firm shall notify the Regulator of its intention to outsource such process at least 20 business days in advance.	<p>To provide you with a fast, reliable, robust and resilient service, Google may store and process your data where Google or its subprocessors maintain facilities.</p> <ul style="list-style-type: none"> <li>Information about the location of Google's facilities and where individual GCP services can be deployed is available <a href="#">here</a>.</li> <li>Information about the location of Google's subprocessors' facilities is available <a href="#">here</a>.</li> </ul> <p>Google provides the same contractual commitments and technical and organizational measures for your data regardless of the country / region where it is located. In particular:</p> <ul style="list-style-type: none"> <li>The same robust security measures apply to all Google facilities, regardless of country / region.</li> <li>Google makes the same commitments about all its subprocessors, regardless of country / region.</li> </ul> <p>Google provides you with choices about where to store your data. Once you choose where to store your data, Google will not store it outside your chosen region(s).</p> <p>You can also choose to use tools provided by Google to enforce data location requirements. For more information, see our <a href="#">Data residency, operational transparency, and privacy for customers on Google Cloud Whitepaper</a>.</p>	<p>Data Transfers (<a href="#">Cloud Data Processing Addendum</a>)</p> <p>Data Security; Subprocessors (<a href="#">Cloud Data Processing Addendum</a>)</p> <p>Data Location (<a href="#">Service Specific Terms</a>)</p>
65.	Article 206 Bis 2, In such notification, the Firm must indicate the adequacy and compliance with the following:		



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66.	Article 206 Bis 2, I. The third-party provider is a resident of a country whose laws provide for personal data protection, securing confidentiality, or the residence country of the third-party provider has international agreements with Mexico regarding personal data protection and information exchange among regulators of financial institutions.	Google LLC is the provider of the services. Google LLC is organized under the laws of the State of Delaware in the USA, where protection of data is regulated by laws enacted on both the national and the state level.  Google will comply with all national data protection regulations applicable to it in the provision of the Services. This is addressed in the <a href="#">Cloud Data Processing Addendum</a> .	Representations and Warranties
67.	Article 206 Bis 2, II. That the Firm warrants that it maintains at their principal offices in Mexico, and at least the documents and information related to the evaluations, audit results and performance reports. Also, if required by the Regulator, such information shall be delivered in Spanish.	Refer to Row 22 for information on the third-party audit reports that Google provides.  Refer to Row 8 for information on how you can monitor Google's performance of the Services.	N/A
68.	Article 206 Bis 2, III. That the Firm has obtained the approval from its Board of Directors, with the prior opinion from the Audit Committee of risk committee, which approval must provide for: (a) hiring the services does not pose a risk as to the adequate compliance of provisions applicable to the Firm, (b) that the third-party provider's practices are consistent with the operation of the Firm, and (c) that the services will not affect the financial stability or operations continuity of the Firm due to the geographical distance, and, if applicable, the language used in the provision of services.	This is a customer consideration	N/A
69.	Article 206 Bis 2, Provisions set forth in Articles 206 Bis and 206 Bis 1 regarding notification to the Regulator, shall apply to the notification referred to in this Article 206 Bis 2.	This is a customer consideration.	N/A
70.	Article 206 Bis 2, The Regulator may require the Firm to provide a draft of the services agreement and a copy of the executed version, with a Spanish translation.	Where relevant regulated entities may disclose a copy of the contract to their supervisory authority.	Enabling Customer Compliance; Information
71.	<i>Compliance</i>		
72.	Article 206 Bis 3, Operations carried out by the Firms through outsourcing must comply with applicable regulations.	Google will comply with all laws, regulations, and binding regulatory guidance applicable to it in the provision of the services.	Representations and Warranties
73.	Article 206 Bis 3, Furthermore, outsourcing of services shall not release the Firms or their officers, employees, representatives or agents, of their obligations to comply with the applicable regulation.	This is a customer consideration.	N/A
74.	Article 206 Bis 3, The Regulator may order measures it considers necessary so that the Firms maintain operational terms and conditions that do not affect the adequate provision of their services to the public or the financial stability or operational continuity of the Firms.	Google recognizes that regulated entities require assistance from Google to enable them to ensure compliance with applicable laws and regulations. We are committed to working with regulated entities in good faith to provide this assistance.  In particular, we appreciate that you will need to have confidence that the Google Cloud Financial Services Contract continues to support your compliance requirements. We are	Enabling Customer Compliance



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		committed to working with you throughout our relationship to address the impact of changes in law or regulation.	
75.	<i>Suspension required by the Regulator</i>		
76.	Article 206 Bis 4, The Regulator, subject to the Firm's right of audience, may order the total or partial, temporary or definitive, suspension of the outsourced services rendered by the third-party provider when in the Regulator's judgment, the financial stability or the operational continuity of the Firm may be affected, or in case the Firm breaches any applicable regulations, including the provisions set forth in the CUCB, unless the Firm submits a regularization program that meets certain requirements set forth in Article 206 Bis 4 of the CUCB, and such program is approved by the Regulator.	<p>Google recognizes that regulated entities require assistance from Google to enable them to ensure compliance with applicable laws and regulations. We are committed to working with regulated entities in good faith to provide this assistance.</p> <p>Google also recognizes that resilience is a key focus for regulated entities and supervisory authorities. Our <a href="#">Strengthening operational resilience in financial services by migrating to Google Cloud</a> whitepaper discusses the continuing importance of operational resilience to the financial services sector, and the role that a well-executed migration to Google Cloud can play in strengthening it.</p> <p>However, if you wish to stop using our services, you can do so at any time. You can elect to terminate our contract for convenience with advance notice, including if necessary to comply with law or if directed by a supervisory authority.</p>	<p>Enabling Customer Compliance</p> <p>Ceasing Services Use; Term and Termination</p>