

PROTECTION OF PERSONAL DATA POLICY - MÁKINA EDITORIAL SAS SCOPE

The following Personal Data Protection Policy will be applied to all Databases and information that contain Personal Data that are subject to Treatment by Mákina Editorial SAS, an entity considered responsible for the treatment of Personal Data, and owner of MakeMake Digital Library.

IDENTIFICATION OF THE RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

Mákina Editorial SAS

NIT. 900.673.404-4

Legal Address: Carrera 13 No. 33 - 74 Of. 401, Bogotá D.C., Colombia.

Queries and claims and requests to update, rectify and delete the data and revoke the authorization: Tel. +57 3134509992 - (571) 2883280, during the hours Monday through Friday from 8:00 a.m. at 6:00 p.m. Email: catalina@makinaeditorial.com

SPECIAL NOTE REGARDING LECTORUM PUBLICATIONS, INC.

Lectorum Publications, Inc. with domicile in 205 Chubb Avenue, in Lyndhurst, New Jersey 07071, only serves as the sales representative of Mákina Editorial SAS in the United States, Canada and Puerto Rico and does not gather or process any kind of personal data other than to supply subscribers with users access links. For any further questions you can contact Lectorum at (800) 345 5946.

DEFINITIONS

Privacy Notice: Verbal or written communication generated by the Responsible Party to Users regarding the existence of the Personal Data Policy Information and the conditions applied to personal data.

Database: Organized set of personal data that is subject to treatment of this Policy.

Personal Data: Any information linked or that may be associated with one or more specific or determinable natural persons.

Sensitive Data: Information that affects the privacy of people or whose improper use can generate discrimination (racial or ethnic origin, political orientation, philosophical or religious convictions, relevance to unions or social organizations or human rights, health data, sexual life and biometrics).

Responsible for the Treatment: Natural or legal person, public or private, that by itself or in association with others, carries out the processing of personal data on behalf of the Responsible Party. In the events in which the Responsible Party does

not act as the manager of the database, the person in charge will be expressly identified.

User, Holder or Owner: Natural person whose personal data is subject to Treatment.

Treatment: Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion.

Transfer: The data transfer takes place when the Responsible Party and / or Person in Charge of the Treatment of personal data, who is located in Colombia, sends the information or personal data to a recipient, who in turn is Responsible for the Treatment and is inside or outside from the country.

Transmission: Processing of personal data that implies the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a treatment by the Manager on behalf of the Responsible.

TREATMENT AND PURPOSES

Mákina Editorial and / or MakeMake, acting as Responsible for the Processing of Personal Data, for the proper development of its commercial activities, as well as for the strengthening of its relationships with third parties, collects, stores, uses, circulates and deletes Personal Data corresponding to natural or legal persons with whom it has or has had a relationship, such as, without the enumeration implying limitation, workers and relatives of these, shareholders, users, clients, distributors, suppliers, creditors and debtors; strictly complying with the security and confidentiality duties ordered by Law 1581 of 2012 and Decree 1377 of 2013, with the following purposes:

a) General purposes for the treatment of Personal Data:

- Provide technical assistance;
- Evaluate the quality of the service, carry out market studies on consumption habits and statistical analysis for internal uses only;
- Manage databases;
- Give responses to requests, complaints and claims;
- To eventually contact, via email, or by any other means, natural persons with whom it has or has had a relationship, such as, without the enumeration implying limitation, workers, users, clients, distributors, suppliers, creditors and debtors, to the aforementioned purposes;
- Transfer the information collected to different areas of Mákina Editorial and / or MakeMake and their related companies in Colombia and abroad when it is necessary for the development of their operations (collection of portfolio and administrative charges, treasury, accounting, among others);
- For the attention of judicial or administrative requirements and the fulfillment of judicial or legal mandates;

- Commercial and operational databases of Mákina Editorial and/ or MakeMake exclusively;
- Any other activity of a similar nature to those described above that is necessary to develop the corporate purpose of Mákina Editorial and / or MakeMake.

b) Regarding the personal data of our Clients and Users

- To fulfill the obligations contracted by Mákina Editorial and / or MakeMake with its Clients and Users at the time of acquiring our products and services;
- Send information about changes in the conditions of the products offered by Mákina Editorial and / or MakeMake;
- Send information about offers related to our products and services offered by Mákina Editorial and / or MakeMake and its related or allied companies;
- To strengthen relations with its Users and Clients, by sending relevant information, taking orders and evaluating the quality of the service;
- For the determination of pending obligations, the consultation of financial information and credit history and the report to information centers of unfulfilled obligations, with respect to its debtors;
- To improve, promote and develop your products and services;
- Train sellers and agents in basic aspects of commercial management of the products offered by Mákina Editorial and / or MakeMake;
- Control access to the platforms of Mákina Editorial and / or MakeMake and establish security measures;
- Use the different services through the Mákina Editorial and / or MakeMake websites, including content and format downloads;

c) Regarding the personal data of our employees

- Manage and operate, directly or through third parties, the personnel selection and hiring processes, including the evaluation and qualification of the participants and the verification of work and personal references, and the performance of safety studies;
- Develop the activities of Human Resources management within Mákina Editorial and / or MakeMake, such as payroll, affiliations to entities of the general social security system, occupational health and welfare activities, exercise of the employer's sanctioning power, among others;
- Make the necessary payments derived from the execution of the employment contract and / or its termination, and the other social benefits that may be applicable in accordance with the applicable law;
- Contract employment benefits with third parties, such as life insurance, medical expenses, among others;
- Notify authorized contacts in case of emergencies during working hours or during the development of the same;

- Coordinate the professional development of the employees, the access of the employees to the computer resources of the employer and provide support for their use;
- Plan business activities;
- To invite them to participate in selection processes and events organized or sponsored by Mákina Editorial and / or MakeMake;
- For the evaluation of the fulfillment of its obligations;
- To register in the Mákina Editorial and / or MakeMake systems;
- To process your payments and verify outstanding balances;

RIGHTS OF THE OWNER OF PERSONAL DATA (USERS):

As the owner of personal data (User), you have the right to:

- Freely access and without cost to the data provided to Mákina Editorial SAS and/or MakeMake that has been subject to treatment;
- Know, update and rectify your information in the face of partial, inaccurate, incomplete, fractioned, misleading data, or those whose treatment is prohibited.
- File a complaint with the Superintendency of Industry and Commerce for infractions of the provisions of Law 1581 of 2012 and the other regulations that modify, add or complement it, once the claim process has been exhausted before the person responsible or in charge of the processing of personal data .
- Request the deletion of the data when the principles, rights and constitutional and legal guarantees are not respected in the treatment, which will proceed.
- Know the data processing policy of Mákina Editorial SAS and or MakeMake as well as the use or purpose that will be given to your personal data.
- Identify the person in charge at Mákina Editorial SAS. that will process and respond to your requests.
- The others indicated by article 8 of Law 1581 of 2012.

The rights of the Holders may be exercised by the following persons: By the Holder (User); the successor of the Holder (User); by the representative and / or attorney-in-fact of the Holder, prior accreditation of the representation or power of attorney; By stipulation in favor of another or for another.

AREA RESPONSIBLE FOR THE ATTENTION OF REQUESTS, CONSULTATIONS AND CLAIMS ABOUT PERSONAL DATA

Mákina Editorial and / or MakeMake is in charge of the development, implementation, training and monitoring of this Policy.

Customer Service is the internal area that has been designated by Mákina Editorial and / or MakeMake as responsible for the attention of requests, queries, complaints and claims before which the Holder (User) of personal data may exercise their rights to know, update and rectify the data.

For this purpose, all employees and contractors who carry out the Processing of Personal Data in the different dependencies, are obliged to transfer to Customer Service, all the responses to the requests, complaints or claims that are received by the Holders of Personal Data in the times established by law.

Customer Service is located at the address:

Carrera 13 No. 33 - 74 Of. 401, Bogotá D.C., Colombia.

Tel. +57 3134509992 - (571) 2883280 - (57) 350 236 703

Email: catalina@makinaeditorial.com or soporte@makemake.com.co

PROCEDURE FOR ATTENTION AND RESPONSE TO REQUESTS, CONSULTATIONS, COMPLAINTS AND CLAIMS OF THE HOLDERS OF PERSONAL DATA

The Holders of the Personal Data being collected, stored, processed, used and transmitted or transferred by Mákina Editorial and / or MakeMake, may at any time exercise their rights to know, update and rectify the information.

For this purpose, the following procedure will be followed, in accordance with the Personal Data Protection Law:

Queries, inquiries, complaints and claims:

Mákina Editorial and / or MakeMake has arranged the following means for the reception and attention of requests, queries, complaints and claims that allow us to keep proof of them:

Legal address: Carrera 13 No. 33 - 74 Of. 401 Bogotá D.C., Colombia.

Tel. +57 3134509992 - (571) 2883280

email: catalina@makinaeditorial.com

Authorization:

Mákina Editorial and / or MakeMake will request prior, express and informed authorization from the Holders of the Personal Data on which the Treatment is required.

This manifestation of the will of the Holder can be given through different mechanisms made available by Mákina Editorial and / or MakeMake, such as:

- In writing, filling out an authorization form for the Treatment of Personal Data determined by Mákina Editorial and / or MakeMake.

- Orally, through a telephone conversation or videoconference.
- Through unequivocal behaviors that allow to conclude that you granted your authorization, through your express acceptance of the Terms and Conditions of an activity within which the authorization of the participants is required for the Treatment of their Personal Data.

IMPORTANT: In no case will Mákina Editorial and / or MakeMake assimilate the Owner's silence to an unequivocal conduct.

SPECIAL PROVISIONS FOR THE PROCESSING OF PERSONAL DATA

1. Processing of Personal Data of a Sensitive Nature

The Processing of Personal Data of a sensitive nature is prohibited by law, unless there is express, prior and informed authorization from the Holder, among other exceptions enshrined in Article 6 of Law 1581 of 2012.

Mákina Editorial and / or MakeMake does not collect Sensitive Personal Data such as data regarding race, ethnicity, political convictions, banking and credit information, health data, human rights data nor any biometric data.

In this case of collecting any such data, Mákina Editorial and / or MakeMake will implement administrative, technical and legal measures contained in its Policies and Procedures Manual, which are mandatory for its employees and, as applicable, for its suppliers, related companies and commercial allies.

2. Treatment of Personal Data of Children and Adolescents

According to the provisions of Article 7 of Law 1581 of 2012 and Article 12 of Decree 1377 of 2013, Mákina Editorial and / or MakeMake will only carry out the Treatment, corresponding to children and adolescents, as long as this Treatment responds and respects the best interests of children and adolescents and ensure respect for their fundamental rights.

Once the above requirements have been met, Mákina Editorial and / or MakeMake must obtain the Authorization of the legal representative of the child or adolescent, prior to the exercise of the minor's right to be heard, an opinion that will be evaluated taking into account the maturity, autonomy and capacity to understand the matter.

PROCEDURE FOR ATTENTION AND RESPONSE TO REQUESTS, CONSULTATIONS, COMPLAINTS AND CLAIMS OF THE HOLDERS OF PERSONAL DATA

The Holders of Personal Data processed by Mákina Editorial and / or MakeMake have the right to access their Personal Data and the details of said Treatment, as

well as to rectify and update them if they are inaccurate or to request their elimination when they consider that they are excessive or unnecessary for the purposes that justified their obtaining or to oppose the treatment of the same for specific purposes.

The channels that MÁKINA EDITORIAL SAS. has implemented to guarantee the exercise of said rights through the presentation of the respective request are:

Address: Carrera 13 No. 33 - 74 Of. 401, Bogotá D.C., Colombia.

Tel. +57 3134509992 - (571) 2883280

Email: catalina@makinaeditorial.com

These channels may be used by holders of personal data, or third parties authorized by law to act on their behalf, in order to exercise the following rights, requests and inquiries:

- The Holder may consult her or his personal data at any time. For this purpose, you can submit a request indicating the information you want to know, through any of the mechanisms indicated above.
- The Holder or her successors in title must prove their identity, that of their representative, the representation or stipulation in favor of another or for another. When the request is made by a person other than the Holder and it is not proven that it acts on her behalf, it will be considered as not presented.
- The query and / or request must contain at least the name and contact address of the Owner (Holder or User) or any other means to receive the response, as well as a clear and precise description of the personal data with respect to which the Owner seeks to exercise the right of consultation and / or request.
- If the query and / or request made by the Data Owner is incomplete, Mákina Editorial and / or MakeMake will require the interested party within five (5) days of receiving the query and / or request to correct the faults. After two (2) months have elapsed from the date of the request, without the applicant submitting the required information, it will be understood that they have desisted from their inquiry.
- Requests and / or inquiries will be attended by Mákina Editorial and / or MakeMake within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend the request or consultation within said term, this fact will be informed to the applicant, stating the reasons for the delay and indicating the date on which the request for consultation will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

Procedure for making complaints and claims:

In accordance with the provisions of Article 14 of Law 1581 of 2012, when the Owner or his successors in title consider that the information processed by Mákina Editorial and / or MakeMake should be subject to correction, update or deletion, or when it should be revoked by If the alleged breach of any of the duties contained in the Law is noticed, they may submit a request to Mákina Editorial and / or MakeMake, which will be processed under the following rules:

- The Holder or his successors in title must prove their identity, that of their representative, the representation or stipulation in favor of another or for another. When the request is made by a person other than the Holder and it is not proven that it acts on her behalf, it will be considered as not presented.
- The request for rectification, updating, deletion or revocation must be submitted through the means enabled by Mákina Editorial and / or MakeMake indicated in this document and contain, at least, the following information:
 - The name and legal address of the Holder or any other means to receive the response.
 - The documents that prove the identity of the applicant and, if applicable, that of her representative with the respective authorization.
 - The clear and precise description of the personal data with respect to which the Holder seeks to exercise any of the rights and the specific request.
- If the application is submitted incomplete, Mákina Editorial and / or MakeMake must require the interested party within five (5) days of receipt to correct the faults. After two (2) months have elapsed from the date of the request, without the applicant submitting the required information, it will be understood that they have withdrawn their application.
- In the event that the person who receives the request is not competent to resolve it, they will transfer it to the Customer Service area, within a maximum term of two (2) business days, and will inform the interested party of the situation.
- Once the request is received, a legend that says "claim in process" and the reason for it will be included in the Database, within a term no longer than two (2) business days. Said legend should be maintained until it is decided.
- The maximum term to meet this request will be fifteen (15) business days from the day following the date of receipt. When it is not possible to attend it within said term, the interested party will be informed about the reasons for the delay and the date on which their claim will be attended, which in no case may exceed eight (8) business days following the expiration of the first term.

Information Obtained Passively (Cookies)

When the services contained within the Mákina Editorial and / or MakeMake websites are used, it may collect information passively through information management technologies, such as "cookies", through which we collect information about the hardware and software of the equipment, IP address, browser type, operating system, domain name, access time and the addresses of the websites of origin. Through the use of these tools, no personal data is collected directly from users. Information about the pages that the person visits most frequently on these websites will also be collected in order to know their browsing habits. However, the user of the Mákina Editorial and / or MakeMake websites has the possibility of configuring the operation of "cookies", according to the options of their Internet browser.

Security of Personal Data

Mákina Editorial and / or MakeMake, in strict application of the Principle of Security in the Treatment of Personal Data, will provide the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or access not authorized or fraudulent. The obligation and responsibility of Mákina Editorial and / or MakeMake is limited to having the appropriate means for this purpose. Mákina Editorial and / or MakeMake does not guarantee the total security of your information nor is it responsible for any consequence derived from technical failures or improper entry by third parties to the Database or file in which the Personal Data subject to Treatment by part of Mákina Editorial and / or MakeMake and their Managers. Mákina Editorial and / or MakeMake will require the service providers that it contracts to adopt and comply with the appropriate technical, human and administrative measures for the protection of Personal Data in relation to which said providers act as Managers.

Transfer, Transmission and Disclosure of Personal Data

Mákina Editorial and / or MakeMake may deliver the Personal Data to third parties not linked to Mákina Editorial and / or MakeMake when:

- They are contractors in the execution of contracts for the development of the activities of Mákina Editorial and / or MakeMake;
- By transfer to any title of any line of business to which the information relates.
- In any case, when Mákina Editorial and / or MakeMake wish to send or transmit data to one or more managers located within or outside the territory of the Republic of Colombia, it will establish contractual clauses or enter into a contract for the transmission of personal data, observing the principles established in Colombian Law and in this policy.

Applicable legislation

This Personal Data Protection Policy, the Privacy Notice, and the Authorization Form Annex that is part of this Policy, are governed by the provisions of current

legislation on the protection of Personal Data referred to in Article 15 of the Political Constitution of Colombia, Law 1266 of 2008, Law 1581 of 2012, Decree 1377 of 2013, Decree 1727 of 2009 and other regulations that modify, repeal or replace them.

Validity

This Personal Data Protection Policy is in force since July 17, 2018. The Personal Data that is stored, used or transmitted will remain in our Database, based on the criteria of temporality and necessity, for as long as necessary for the purposes mentioned in this Policy and the respective Authorization, for which they were collected.

Modifications

This Policy may be modified by Mákina Editorial and / or MakeMake when required without prior notification, provided that they are not substantial modifications. Otherwise, they will be previously communicated to the Holders.