

1. Definitions

Personal data: means any information relating to a living person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.

Processing: means any operation which is performed on personal data, such as collection, recording, organising, structuring, storage, adaptation or any kind of disclosure or other use.

2. Data Controller

Depending on the data subject's country, the data controller for the processing will be the following:

- Spain: Macmillan Iberia S.A.U., con NIF A78603479, with registered office in Rosario Pino 14-16, floor 4, 28020, Madrid with telephone number +34 915249420 and email es.registros@macmillaneducation.com
- Poland: Macmillan Polska Sp. z o.o., nr NIP 527-22-56-489, with registered office in al. Jerozolimskie 146a, floor 2, 02-305, Warsaw with telephone number +48 22 32 11 900, and email iod@macmillaneducation.com
- Rest of the countries Springer Nature Limited, registered in England with company number 785998 whose registered office and place of business is at 4 Crinan Street, London, N1 9XW, United Kingdom and email dataprotection@springernature.com

You can contact the Data Protection Officer in: dataprotection@springernature.com

3. Personal data processed

We will process the following personal data:

- Name
- Telephone
- Address;
- Email address;

4. Purpose of processing

Your personal data collected will be processed and incorporated into the database owned by Macmillan for the following purposes:

- The management of the prescription of textbooks and educational services, and carry out all the management of administrative, tax and accounting activities derived from this activity;
- Carry out promotional activities and get your opinion about editorial novelties, books, events, training, products and services in the editorial field of Macmillan, including the sending of commercial communications by any electronic or non-electronic channel that the user facilitates. This commercial information may be generic or personalized. In the latter case, it will involve the previous treatment of your data in order to be able to proceed with its profiling and characterization, determine tastes, preferences and needs and, based on these, identify the offers that may be more interesting.
- Carry out promotional activities and get your opinion about editorial novelties, books, events, training, products and services in the editorial field of Macmillan Group companies and/or third parties, including the sending of commercial communications by any electronic or non-electronic channel that the user facilitates. This commercial information may be generic or personalized. In the latter case, it will involve the previous treatment of your data in order to be able to proceed with its profiling and characterization, determine tastes, preferences and needs and, based on these, identify the offers that may be more interesting.
- For the elaboration of statistics and reports

Your data will be kept by Macmillan since you requested your withdrawal as long as necessary in order to meet the possible responsibilities. After this period, if there are no incidents, the information will be destroyed by secure means that prevent its subsequent recovery.

5. Legal basis for processing

The legal basis that legitimates the processing of your data is the legitimate interest of Macmillan to perform the prescription of textbooks and educational services and the elaboration of statistics and reports.

The legal basis that legitimates the processing of your data for the sending of commercial communications is your consent, in case it has been requested and granted, as well as the legitimate interest of Macmillan in bringing to your knowledge products or services similar to those previously prescribed services.

6. Information sharing

Your personal data will be disclosed to the following third parties for the purposes mentioned above:

- Companies of the Springer Nature Group to which Macmillan belongs, and which can be found at the following link <https://group.springernature.com/la/group/about-us/locations-contact> The legal basis that legitimates the communication of your data is the legitimate interest of the Group, to comply with administrative purposes, or consent.
- In addition we may disclose your personal data to following suppliers who assist us in providing the following services:
 - Private administrative agencies, legal advisers and job counsellors, and/or training companies.
 - Service providers and IT systems.
 - The information society services suppliers.

Such transfer will be based on data processing agreements. Therefore, our contractors will only use your personal data to the extent necessary to perform their functions and will be contractually bound to process your personal data only on our behalf and in compliance with our requests.

7. Cross-border data transfers

Within the scope of our information sharing activities set out above, your personal data may be transferred to other countries (including countries outside the European Economic Area (EEA)) which may have different data protection standards than your country of residence. Please note that data processed in a foreign country may be subject to foreign laws and accessible to foreign governments, courts, law enforcement, and regulatory agencies. However, we will endeavour to take reasonable measures to keep up an adequate level of data protection when sharing your personal data with such countries.

In the case of a transfer outside of the EEA, this transfer is safeguarded by EU Model Clauses in accordance with Article 46 GDPR. You can find further information about the aforementioned safeguards by following this link https://ec.europa.eu/info/law/law-topic/data-protection_en or contact our Group Data Protection Officer via dataprotection@springernature.com for specific information on respective safeguards.

8. Data subject's rights.

Macmillan informs you that you can exercise the following rights at any time:

- Right to information. Right to receive information about the categories of data obtained, the recipients or categories of the recipients to whom the data is transferred, and when possible, the period foreseen for which the personal data will be stored or, if this is not possible, the criteria to determine that period. We provide this information through this clause.
- Right of access. Right to request access to personal data relating to the interested party and obtain a copy of the personal data object of the processing.
- Right to rectification and/or withdrawal (right to be forgotten). Right to request rectification or deletion of personal data, in cases in which (i) the data are inaccurate or incomplete, (ii) are no longer necessary for the purposes for which they were collected, (iii) the consent by which based on the processing of the data has been withdrawn, the withdrawal of consent will not affect the legality of the treatment based on the consent prior to its withdrawal. (iv) has exercised the right of opposition. In the event that the data is also processed by third parties, the decision of rectification, deletion or restriction will be sent to these third parties unless it is impossible or involves a disproportionate effort.
- Right to limitation of processing. Right to request the limitation of the processing, in the cases provided for in the applicable legislation, in which case they will only be retained for the exercise or defense of claims.
- Right to data portability. Right to the portability of the data to the interested party or another data controller in which a copy with the personal data in a structured format, commonly used and mechanically readable, will be provided to transmit this data to another responsible person without obstacles, provided it is technically possible.
- Right of opposition. Right to object to the treatment at any time, so that Macmillan will stop processing the data, except for legitimate reasons or the exercise or defense of claims.
Additionally, you may object at any time to (i) that your personal data be used for direct marketing purposes; (ii) not be subject to any automated decision-making, including profiling (automatic decisions based on automatic data processing, in order to evaluate various personal aspects) that produce legal effects on you or affect you a similar meaning.
- Right to file a claim. You have the right to take legal action in relation to any possible violation of your rights with respect to the processing of your personal data, as well as to file a claim with the competent Data Protection Control Authority if you consider that any of the Your rights.

- not to be subject to any automated decision making, including profiling (automatic decisions based on data processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance.

You can (i) exercise the aforementioned rights or (ii) pose any question or (iii) file a complaint regarding our data processing by contacting us in the contact details listed below.

9. Contacting us

Spain: Please submit any questions, concerns or comments you have about this privacy notice or any requests concerning your personal data contactig our Group Data Protection Officer via dataprotection@springernature.com.

The information you provide when contacting us ([please provide, e.g. name or email address]) will be processed to handle your request and will be erased when your request is completed. Alternatively, we will restrict the processing of the respective information in accordance with statutory retention requirements.