

## PRIVACY POLICY FOR THE LYCANSMX.COM WEBSITE

### Information of the Responsible Party

For Minds On, S. C. (hereinafter "LYCANS"), its clients come first, which is why it is concerned with and handles the taking care of personal information provided to it through its website LYCANSMX.COM (hereinafter the "Website") in order to provide the best attraction and search services for company directors, managers and executives. For this reason and in compliance with that which is established in articles 15, 16 and other subsequent articles from the Federal Act for the Protection of Personal Data in the Possession of Private Parties, we inform you that we are responsible for the use and protection of the personal data that is provided to us, which is why we have implemented the security measures required in order to maintain your confidential personal information confidential and safe at all times from any attempted violation.

Likewise, we do hereby inform you that our address is located at:

AV. SANTA FE 94 (Samara) Tower 'A' floor 8 Col Zedec. Mexico City, 01210 Federal District Tel. (52 55) 9171 1053 Fax (52 55) 8851-1111

### Intention of the Privacy Policy

The Privacy Policy herein is made available to you with the intention of informing you, in your capacity as Owner of the personal data provided, of the processing of said data, as well as the specific information for exercising your rights of access, amendment, cancellation and opposition (hereinafter "ARCORights").

It is important to inform you that the Federal Act for the Protection of Personal Data in the Possession of Private Parties protects your personal information from unauthorized use without your consent and, for this reason, this document will inform you of the information that we will collect from you, for what purpose and how we will use it, your ARCO Rights, as well as the withdrawal of your consent, which you can enforce with LYCANS, all of the above for the purpose of providing you with complete control and resolve regarding your personal data. For this reason, we recommend that you carefully read the following information:

The Privacy Policy herein is applicable to Owners of Personal Data obtained directly, indirectly or personally by LYCANS, through processes for the procurement of services, letters, applications for information, sending of curriculums, as well as the various forms contained on the LYCANS Website, or any other medium specified for such purposes, which refer to this Privacy Policy.

### Ways of obtaining your information

LYCANS obtains stores and handles your personal information by virtue of the current or future legal relationship that exists with you, as well as your information which is voluntarily added through our Website.

LYCANS may obtain your information personally when you physically give it to any of our employees or managers, directly when you or your legal representative provide it to us through technological or correspondence mediums designated for this purpose, especially by means of our Website and indirectly through public or third party databases that provide it to us for reference.

### Protection

LYCANS shall implement the tools required for the protection of your personal information. The information is protected by a personal identification key, which only you can access.

Once the data and user keys have been received, we will do everything within our power to protect your safety in our systems.

Once you have added your information, you will receive a password; however, this information cannot be reviewed or modified.

### The information we collect

The personal information that LYCANS obtains directly, indirectly or personally from its users, clients, suppliers and/or any person relating to the services includes that which is mentioned in the following classification:

#### Identification data:

Name, paternal surname, maternal surname, marital status, gender, date of birth, country, state, city, Unique Population Registration Code (CURP in Spanish), address, home telephone number, mobile phone number and e-mail.

#### Educational data:

Data relating to your bachelor's degree, master's degree, doctorate, diplomas, institution, area of studies, start and end of studies, status of studies, computer and language knowledge.

#### Employment data:

Company, location, periods, position, salary, department, summary of the company, type of company, start, end, activities carried out, personnel under your responsibility, skills.

#### Sensitive data

LYCANS does not request Sensitive Personal Data on its LYCANSMX.COM Website.

### The use made of your personal information

LYCANS will use your personal information for some of the following purposes:

1. To be analyzed and assessed in order to establish professional personal profiles, according to the criteria previously established by third party companies that request our services;

2. In order to begin, fulfill, maintain, negotiate and terminate the legal relationship between you and LYCANS;
3. In order to operate, manage, invoice, collect, handle, provide, extend and improve our services;
4. In order to protect access to the LYCANS Website;
5. In order to deliver notifications, requirements, letters or newsletters or in order to deal with your applications relating to the services we provide;
6. In order to transfer your information in applicable cases pursuant to the section "Who we share your information with" from this Notice;
7. In order to prevent or report illegal activities or events to different authorities;
8. In order to send newsletters and offers for products that we commercialize through e-mail marketing, physical and telephone advertising;
9. In order to maintain the working relationship, payment of wages, as well as fees, employee health campaigns and compliance with applicable social security provisions, as well as to contract on behalf of LYCANS employees all kinds of insurance policies and/or services at the request of said employees;
10. In order to comply with the performance of your ARCO rights;
11. In order to comply with contractual relations with LYCANS, which may solely and exclusively be treated for compliance with the ends subject to said relationship, whether as a client, candidate or supplier, in the form and terms established in this section of use of your personal information.

If you accept having read this Privacy Policy and do not express your opposition to your personal data being handled in the aforementioned form, it shall be understood that you have given your consent for this purpose.

#### **Who we can share your information with**

In order to properly provide its Services, LYCANS may partially or completely disclose and/or transfer to national or foreign third parties personal information in its possession, in order to comply with any of the purposes established in the Privacy Policy, in the following cases:

1. To persons affiliated with and/or related to LYCANS for the purposes of preparing socio-economic, reference and psychometric studies and those studies required for a suitable assessment of the profile of the candidate in relation to the vacancy;
2. To persons affiliated with and/or related to LYCANS for the purposes of the verification, reviewing and certifying of said information for tax and administrative purposes;
3. To the Tax Administration Service and to electronic invoicing service providers, by virtue of the processes of issuing and sending Digital Tax Receipts over the Internet;
4. To affiliated or non-affiliated companies that assist, support or contribute to LYCANS in order to effectively comply with the provision of its services, sending by e-mail of information relating to our services and proposals, sending of information requested through its Website, negotiations or in order to provide its services to third parties;
5. To third parties in order to protect and defend the interests and rights of yourself, LYCANS and/or other third parties;
6. To third parties in order to contract all types of insurance policies and/or services on behalf of LYCANS' employees at the request of said employees;
7. To third parties in order to protect your security and/or interests, the security and/or interests of the personnel and affiliates of LYCANS, of its clients and suppliers or the general public;
8. To various authorities for the presentation of requirements or to record them in any legislation or regulations.

If you accept that you have read this Privacy Policy and do not state your opposition to your personal data being transferred, it shall be understood that you have expressed your consent for this purpose.

#### **Exclusion of Liability**

Our Website may contain hyperlinks or hypertext "links", banners, buttons and/or internet search tools, which, when used by users transport them to other portals or Internet sites that may belong to third parties. Personal Data that may be provided by users through these portals or Internet sites, other than the LYCANS site, is not its responsibility, for which reason you should check the Privacy Policy of each Website that you access.

#### **Limitation of use and disclosure of information**

In our program for the notification of promotions, offers and services via e-mail, only LYCANS has access to the collected information. This type of advertising is carried out through promotional e-mail notices and messages, which shall only be sent to you and to those contacts registered for such purpose and you may modify this indication at any time. Third party offers from our trading partners may occasionally be included in e-mails sent.

#### **Exercising of your ARCO rights**

LYCANS shall at all times ensure compliance with the principles of protection of the personal data that it handles. For this reason, you, in your capacity as Owner of the personal data or its duly accredited legal representative, may limit the use or disclosure of your personal data, as well as withdraw your consent.

Likewise, rights of access, amendment, cancellation or opposition stipulated by the Law by means of a request sent to the e-mail: [datospersonales@lycansmx.com](mailto:datospersonales@lycansmx.com) or directly to our offices where your application will be dealt with and/or any question answered in relation to the content of this Privacy Policy.

The exercising of your rights shall be processed through the head of our Personal Data Protection Department, who you can contact directly at the e-mail referred to in the previous paragraph or directly at the address established in the introduction to this privacy policy.

In order to facilitate your request, you will find below a sample text for exercising your ARCO rights:

(Place and date)  
MINDS ON, S. C. (LYCANS)  
FAO: Personal Data Department.

RE: Request for the exercising of Personal Data Rights.

Dear Sir or Madam,

I do hereby request: \_\_\_\_\_ (Brief clear and precise description of the personal data in relation to which you wish to exercise a right, as well as the right you wish to exercise), for the purposes \_\_\_\_\_ of which I identify myself by means of \_\_\_\_\_ (Indicate the document used for identification purposes). The foregoing is in accordance with the privacy policy of your company.

Sincerely yours,

Name and signature of the owner of the data or their legal representative (In the latter case, the supporting document of the powers of the representative may be requested)."

#### **Updates and/or modifications**

Any modification or up-date to this Privacy Policy shall be published on the LYCANSMX.COM Website, with notification at least 15 calendar days beforehand or when indicated by applicable legislation, so that, if necessary, you may state your opposition to the new handling of your personal data.

#### **Acceptance of the Terms**

This statement of Confidentiality / Privacy is subject to the terms and conditions of all LYCANS' websites, which constitutes a legal agreement between the user and LYCANS.

Date of last update: January 12<sup>th</sup>, 2017.