



Privacy Policy

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Legal Notice

Spectra is an online service edited by Perspective SAS, a French simplified joint stock company registered with the Paris Trade and Companies Register of Paris under number 801 407 453, headquartered at 66 avenue des Champs-Élysées, 75008 Paris.

The purpose of this document is to provide information regarding the processing of personal data by the Company in compliance with article 13 of the GDPR.

For all questions or requests, you may contact us at the following email address: contact@spectra.finance

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1. Definitions

1. Where drafted in upper case, whether singular or plural, the following definitions are applicable to the entire Privacy Policy.

Cookie	refers to a small file stored by a server in the terminal, as defined in this Privacy Policy.
Personal Data	refers to any information relating to an identified or identifiable natural person, as defined in article 4 of the GDPR.
Platform	refers to spectra.finance , including all its subdomains.
The Company, We, Us, Our	refers to PERSPECTIVE SAS, as identified in the Legal Notice.
Service	refers to the service provided by the Company, as described on the Platform and in the T&Cs.
T&Cs	refers to the terms and conditions applicable to the Service and available on the Platform.
User, You, Your	refers to any data subject to the collection and processing of Personal Data by the Company.
Wallet	refers to the User's cryptocurrency non-custodial wallet under his/her sole control.

2. Any term defined in article 4 of the GDPR and mentioned in this Privacy Policy shall have the same meaning.

2. Foreword

3. We believe that trust is the key to successful and lasting relationships. In this respect, the protection of Your Personal Data and privacy is no exception. For this reason, We take great care to collect and process Your Personal Data with the utmost care and in strict compliance with the applicable legal framework.
4. In drafting this Privacy Policy and making it available to Our Users, We intend to fulfill Our duty to inform data subjects within the meaning of articles 13 and 14 of the Regulation EU (2016/679) of the EU Parliament and the Council of 27 April 2016 (the "GDPR").
5. This Privacy Policy will describe how Your Personal Data is processed when You navigate on the Platform and use Our Service.
6. We may amend this Privacy Policy from time to time, in which case We will update You by any available means, including by way of notification on the Platform.

3. Data We collect; purposes and legal basis

3.1 Data that You chose to provide to Us

7. **Communications.** We collect and process Personal Data in order to respond to any questions, requests or feedback that Users may submit to us, including:

- Identification information (IP address);
- The content of the message that You send to Us.

8. For this purpose, We use the service provider Ask Dialog.

9. This processing is based on Your consent and Our legitimate interest in managing Our relationship with You.

3.2 Information collected automatically when You use the Platform

10. Users must connect their Wallet on the Platform to access the Service. We do not collect any Personal Data in this context. However, when You use the Platform, We collect navigational information, as detailed below.

11. **Navigational information.** In order to enhance the User experience, We need to understand Your interactions with the Services. We may use the following Data to perform analytics, debug, and conduct research on the performance of Our Platform and You use of the Service:

- Unique identifiers (browser type and settings, device type and settings, operating system);
- Interaction information (IP address, system activity, date and time of the requests).

12. For this purpose, We use the service provider Use Fathom.

13. To do so, We rely on Our legitimate interest to (i) understand how Our Platform is browsed by Users; and (ii) improve the Platform based on such Data.

4. Our role; other recipients

14. The Company acts as a data controller regarding User's Personal Data.

15. We share Your Personal Data with service providers who assist Us in fulfilling the purposes specified in this Privacy Policy. As Our subcontractors, such service providers may have access to Your Personal Data for the sole purpose of carrying out the specific tasks assigned to them. Our service providers are:

- Use Fathom for monitoring our Platform. For this purpose, we share the following Personal Data: Navigational information. For more information You can consult Fathom's [privacy policy](#).
- Ask Dialog for monitoring customer relations. For this purpose we share the following Personal Data: Navigational information. For more information on those providers, You can consult Dialog's [privacy policy](#).

16. Where appropriate, We will share Your Personal Data with the relevant courts and any other governmental and/or public authority requesting access to Personal Data, to the extent legally permitted.

17. In any event, We will only disclose Your Personal Data to the above-mentioned recipients on a strict need-to-know basis and only to the extent necessary to achieve the identified processing purposes.

18. When possible, the Data We collect from You is stored and processed at data centers in the European Union. However, in the cases set forth above, your Data may be transferred to countries located outside of the European Union who provide an equivalent level of protection. In the event of transfer to other countries, the protection of your Data will be ensured by adequate safeguards such as the signature of standard contractual clauses approved by the European Commission.

5. Other information

19. Users are never compelled to provide Personal Data that We may request. However, We draw Your attention to the fact that if You refuse, access to the Services may be limited, suspended or impossible.
20. In any event, and regardless of the purpose of the processing in question, We will adhere to a strict principle of data minimisation and will therefore only collect and process Personal Data that is necessary for the purposes mentioned above.

6. Your rights

21. Users are informed that they have the following rights regarding the processing of their Personal Data, under the conditions provided for in articles 15 to 22 of the GDPR:
 - A right of access to the Personal Data We collect;
 - A right to the rectification and/or erasure of the Personal Data We collect;
 - A right to the restriction of the processing;
 - A right to Personal Data portability.
22. According to French privacy laws (articles 84 to 86 of Act n°78-17 of 6 January 1978), Users also have the right to specify instructions defining how We shall manage Person Data after their death under the conditions of such law.
23. Although You have rights, the exercise of such rights is not unlimited; each of the rights offered by the GDPR may be subject to specific conditions.
24. This being said, in order to exercise their rights or for any question on privacy, Users shall make a request accompanied by a proof of their identity by email at contact@spectra.finance.
25. We will process the requests within a reasonable timeframe taking into account the complexity and the number of requests. We shall strive to reply without undue delay and at the latest within two weeks of receipt of the request. We may extend this period to one (1) month in the case of a complex request.
26. The exercise of the rights offered by the GDPR are in practice free. However, where Your requests may involve important costs, You may have to bear some of them.
27. Finally, Users have the option to refer to the competent supervisory authority, the French *Commission Nationale Informatique et Libertés* (“**CNIL**”), in order to submit a claim. Contact information of the CNIL can be found on its [website](#).

7. Storage and security

28. Data is hosted and processed on secure servers located within the European Union and operated by Our's subcontractors acting in accordance with the requirements of the GDPR.
29. In the event that the integrity, confidentiality or security of the User's Personal Data is compromised, We undertake (i) to notify the CNIL of the breach within 24 hours of becoming aware of it and (ii) to inform the User concerned as soon as possible when the breach is likely to result in a high risk to the rights and freedoms of that person.

8. Cookies

- 30. A *Cookie* is a small computer file playing the same role as a tracker, stored and read for instance at the moment where a website is visited, an email is read or a mobile app is used, whatever the device used.
- 31. In compliance with EU privacy regulations, Users are informed that “non-essential” Cookies may be deposited on their device without their consent. Non-essential Cookies include (i) Cookies having as their essential purpose to allow or enable electronic communications and (ii) are strictly necessary for the provision of online communication service.

9. Amendment of the Privacy Policy

- 32. We might review and update this Policy. Any changes We make will be posted on the Platform and, where appropriate, notified to You. Please check back frequently to see any updates or changes to Our Privacy Policy.
- 33. It is important that the Personal Data We hold about you is accurate and current. Please keep us informed if Your Personal Data changes during Your relationship with Us.