

Privacy Policy

Spectre.ai prioritises the protection of your financial and personal data. This section of the website details how we treat and store said data, collected either directly by your usage of our platform (website or application or 3rd party application connecting to the Spectre.ai decentralised autonomous liquidity pool) or via 3rd parties such as affiliates, in connection to our services.

In detail, through sign-up, usage or participation in any of our web properties, mobile phone applications, webinars and news updates, Spectre.ai may collect the below information about you directly, from 3rd parties such as affiliates or through bought-in third party marketing lists and other publicly available sources.

This policy is subject to changes depending on regulatory, operational or technological changes to both the financial trading landscape and our company.

We reserve the right to record all communications whether by online channels, telephone (without warning), in person or otherwise. Said recordings are the property of Spectre.ai and constitute evidence of communications between you and us.

1. Data Controller

This privacy notice applies to the processing activities of Spectre Global Limited, trading as Spectre.ai. Spectre.ai provides Smart Options and Smart CFD trading services and is the data controller of your financial and personal data.

2. Collection of Data

Spectre.ai may collect and store the following items of information from you either via online forms, the financial trading platform, or under KYC procedure performed onsite:

- name, address and contact details (including email, telephone and social media accounts)
- date of birth and gender
- professional and employment details
- National ID or passport number
- Income and wealth information
- trading history and performance
- Ethereum or other cryptocurrency wallet address (but never your private key)
- I.P address
- Machine address code

We may ask for other personal information voluntarily from time to time and if you choose not to provide the information we require to fulfil your request for a certain product or service, we may not be able to provide you with the requested product or service.

The following information about your trading is collected by us:

- assets you trade
- contract types you trade
- your win rate on assets and contracts traded
- your login activity
- your average position size
- your average win size
- your average loss size
- the average duration of your trades

- your drawdown
- your ROI

3. Consent

Where the use of your personal information by us requires your consent, such consent will be provided in accordance with the applicable customer terms and conditions available on our web properties or any other contract we may have entered into with you or stipulated in our communication. Equally, where we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw your consent at any time by contacting us using the contact details set out below.

4. Sharing of Data and Transfers

During the course of business, we may share your information with the following:

- introducing brokers and affiliates with whom we have a mutual relationship;
- professional advisors such as our solicitors in connection with any ongoing or prospective legal proceedings or in order to establish, exercise or defend our legal rights, and our auditors and accountants in order to satisfy our regulatory and financial reporting obligations
- credit providers, any relevant regulatory, governmental, or law enforcement authority as required by law or as agreed with you
- credit reporting and reference agencies
- any member of our group including but not limited to our subsidiaries, holding company and its subsidiaries and successors to our business.
- anyone authorised by you.
- our insurers, agents, service providers, advisers, suppliers and subcontractors who provide us with insurance, administrative, IT, financial, verification, regulatory, compliance research or other services

We ensure that 3rd parties who obtain your personal data understand the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy notice. Where any 3rd party uses your personal data as data controller, such use is not covered by this privacy notice and is not subject to Spectre.ai's privacy standard and procedures.

We may transfer your personal information to any region (ensuring that the transfer is lawful and that there are appropriate security arrangements in place) or to another one of the company's companies as well as processors who are engaged on our behalf. In order to transfer personal information to 3rd parties in territories where applicable legislation may not be adequate, we will enter into arrangements with such 3rd parties to ensure appropriate and suitable measures are taken to protect data breaches. 3rd parties such as credit reporting, reference and governmental agencies may keep a record of any searches and may use the search details to assist other companies in performing their searches.

5. Security and Storage of Data

Spectre.ai has taken measures and precautions to protect the security of your personal information. Our employees are bound contractually to respect the confidentiality of your personal data. Our Chief Operating Officer is also our Data Security Officer and works with our in-house legal resources to ensure our compliance with this privacy policy and applicable laws and regulations.

We hold personal information in secure data centres (AWS and OVH), off-line secured files and online secure media channels protected by 2-factor-authorisation. When we consider that personal information is no longer needed, we will remove any details that will identify you and we will securely destroy the records.

In order to comply with our KYC procedures, we may hold any data collected from you for this reason, for a period of up to ten years. If we hold any personal information in the form of a recorded communication, by

telephone, electronic, in person or otherwise, this information will be held up to a period of ten years after the date said information was collected by us.

Where you have opted out of receiving marketing communications we will hold your details on our opt-out list.

6. Cookies

We use cookies on our web properties including trading platform and apps, to provide you with more relevant and effective experience. This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

7. Technological and Operational Advances

Changes in the regulatory landscape, our technology and operations alike, may individually or collectively affect your privacy and the way we collect, store and manage your data. You will be notified in this privacy notice at the time of change.

8. Links to 3rd Parties

Our web properties and apps may have links to 3rd party websites. Those websites are not subject to Spectre.ai's privacy standards and procedures. Please check with each 3rd party regarding their privacy policies.

9. Contact

Should you be concerned about us ensuring your privacy, please email: legal@spectre.ai. February 2018