

## **Privacy Policy**

Thanks for using Spectre Trading Limited or visiting one of our websites. This policy explains the what, how, and why of the information we collect when you visit one of our websites, or when you use our Services. It also explains the specific ways we use and disclose that information. We take your privacy extremely seriously, and we never sell lists or email addresses.

Spectre Trading Limited is committed to respecting your privacy and protecting your personal information.

We will be transparent about the information we are collecting and what we will do with it.

We will use the information you give us for the purposes described in our Privacy Policy, which include providing you with services you have requested and enhancing your experience with Spectre Trading Limited.

We will also use the information to help us understand you better and so that we can give you relevant offers.

If you tell us that you don't want to receive marketing messages, we will stop sending them. We will, of course, continue to send essential information relating to a product or service you have purchased.

We will put in place measures to protect your information and keep it secure.

We will respect your data protection rights and aim to give you control over your own information.

You can access our full Privacy Policy below to help you to understand better how we use your personal information. In it, we explain in more detail the types of personal information we collect, how we collect it, what we may use it for and who we may share it with.

If you have further questions please get in touch with us by emailing [support@betverse.io](mailto:support@betverse.io) or writing to Spectre Trading Limited, PO Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines.

### **Full Privacy Policy**

This Privacy Policy applies to all websites and web applications which link to this policy and are published by Spectre Trading Limited ("Sites").

The Sites may contain links to other Web sites for your convenience and information. We are not responsible for the privacy practices or the content of those sites.

If you wish to amend any of the personal information that we hold about you, or update your marketing preferences, you can do so at any time through your account.

If you have any queries about how we use your personal information, please contact us at [support@betverse.io](mailto:support@betverse.io).

## **Information we collect**

This section details the information we may collect about you. We explain why, and how, we use it in later sections.

### **Account information**

If you decide to create an account or inquire about one of our products or services, we'll ask you to provide us with some specific information, for example:

- Basic personal details – such as your first name and last name;
- Personal details– such as address, and proof of residency, phone number, mobile phone number, and email address;
- Work details – such as job title, department, company name, company address, work email address and office phone number;
- Log in details – such as username and password;
- Payment details – such as your ETH/BTC address, billing address and credit card information.
- Passport and KYC contact details : Such as Passport, Proof of Residency, Selfie /Photo Verification

### **Additional information**

On occasion, we will ask you to voluntarily provide additional information, for example:

- Your opinion of our products and services;
- Your preferences, including newsletters or web alert topics;
- Information we obtain from partners and public sources

In some circumstances, we collect information about you from our partners or from publicly available websites to help us better understand our audience and enhance the relevance of our content.

### **Information we obtain through cookies and similar tools**

We use cookies (and similar technologies) and analytics tools across our Sites to collect information about you. This information can be used to improve the performance of the site, make advertising more relevant and enhance your user experience.

Your usage – we use cookies to understand how our customers use our Sites and interact with our communications and journalism. For example, we use technology on our Sites, which records user movements, including page scrolling, clicks and text entered. (It does not record payment details.) This helps us to identify usability issues and improve the assistance we can provide to users and is also used for aggregated and statistical reporting purposes.

Your device – we use cookies to understand what type of device you are using to show you the best version of the site.

Your location and IP address – we use cookies to differentiate between legitimate activity and potential fraudulent activity on our Sites. For example, we use your location and IP address to determine if more than one person is using the same account, which is against our Terms.

Your engagement with advertisements – we use cookies to understand what advertisements you have been shown, or clicked on, to bill our advertising partners, and to present you with advertisements that are more relevant to you.

If you wish to manage your cookies, please read below:

### **What are cookies?**

Cookies are small text files which a website may place on your computer or device when you visit a site. The cookie will help the website, or another website, to recognize your device the next time you visit. Web beacons, pixels or other similar files can also do the same thing. We use the term “cookies” in this policy to refer to all files that collect information in this way.

Cookies serve many functions. For example, they can help us to remember your username and preferences, analyse how well our Sites are performing, or allow us to recommend content we believe will be most relevant to you.

The majority of websites use cookies to collect and retain personal information about their visitors. Most cookies collect general information, such as how visitors arrive at and use our Sites, the device they are using, their internet protocol address (IP address), what pages they are viewing and their approximate location (for example, we would be able to recognize that you are visiting our Sites from London).

### **Purpose of cookies**

We group our cookies into the below categories.

#### **Operating our Sites**

Some cookies are essential for the operation of our Sites. This includes cookies for the following purposes:

Performance – we use these cookies to monitor Site performance. This allows us to provide a high-quality experience by quickly identifying and fixing any issues that arise. For example, we might use performance cookies to track error messages, and to determine improvements to our Sites.

Functionality – we use functionality cookies to allow us to remember your preferences. For example, we use functionality cookies to provide you with enhanced services, such as allowing you to watch a video online or comment on a blog.

Analytics – we use cookies to help us understand our audience and the success of advertising campaigns. For example, we count articles views to present ‘Most Read’ content. We also use analytics cookies to keep track of how many advertising impressions have been served for a campaign and to manage the frequency at which you see the same adverts.

Fraud prevention – we use cookies to monitor and prevent suspicious activity and fraudulent traffic.

### **Advertising**

We use cookies to serve you with advertisements that we believe are relevant to you and your interests. You may see these advertisements on our Sites and on other sites that you visit. For example, if you read a number of articles on the BVI, you may see an advertisement for a BVI company as we have inferred that you are interested in this topic. You may also see advertisements for our products and services on other websites if you have previously visited our Sites.

For our Sites that offer behaviourally or demographically targeted advertising, you will have the opportunity to turn this off in your account. Please note, if you turn this off you will still see the same number of advertisements, but they may be less relevant to you. You may continue to see “contextual” advertisements that are not targeted based on your personal information – for example, a motoring advertisement presented on a motoring article.

### **Third party cookies on our Sites**

We also use third party cookies on our Sites that fall into the categories above (“third party cookies”) for the following reasons:

- to help us monitor traffic on our Sites (like many companies, we use Google Analytics to do this);
- to identify fraudulent or non-human traffic;
- to assist with market research;
- to improve Site functionality;
- to monitor compliance with our terms and conditions and copyright policy.

These third party cookies are used within programmatic for measurement and attribution, and management of frequency. They may also be used for personalization of advertisements based on data you have shared with third parties, to the extent that you have consented to this.

### **Use of pixels in emails**

Our emails often contain a single, campaign-unique “web beacon pixel” to tell us whether, and how many times, our emails are opened and verify any clicks through to links or advertisements within the email. We use this information for purposes including:

Determining which of our emails are more interesting to users;

Determining users’ activity and engagement with our products and services;

Informing our advertisers (in aggregate) how many users have clicked on their advertisements.

The pixel will be deleted when you delete the email.

### **How to manage cookies**

You can also manage your cookies via your browser settings. For more information, please visit your browser's help page.

### **Lawful basis for processing**

We only process personal information where we have a lawful basis for doing so, such as the following:

**User consent** – This is where you have given us explicit permission to process personal information for a given purpose. For example, if you requested to receive information about Spectre Trading Limited's products and services, we would ask for your consent if we wanted to use your personal information for any other purpose. You have the right to withdraw this consent at any time. You can manage your preferences within your account or by contacting customer service.

**Legitimate business purposes** – This is where we have a legitimate interest, as a business, to process personal information. For example, where we are aware of copyright infringements on our Site, it is in our legitimate interests as a business to identify those responsible. We take due care to balance our interests against your right to privacy.

**Contractual necessity** – This is where we have to process personal information to meet our contractual obligations.

**Legal obligation** – This is where we have to process personal information in order to comply with the law. For example, we process and retain customer invoice information to comply with financial regulations.

### **How we use your personal information**

We collect personal information for the following reasons:

**To provide our service** – We require some of your basic personal information so our services work as you would expect, for example, providing access to our digital content, notifying you of changes to our services and dealing with customer services queries.

**To improve and maintain performance** – In order to provide you with the best possible user experience, we need to make sure that our products and services work as they should. Using personal information helps us understand how our readers use our Sites so we can make improvements. This includes testing proposed developments on our Sites, reaching out to our customers with market research surveys and hosting subscriber focus groups.

**To bill our customers** – We, along with our authorized payments processors, securely process your payment information to take payments, give refunds and to detect and prevent fraudulent activity.

**To monitor compliance with our policies and terms** – We monitor for breaches of our terms and conditions and copyright policies.

To personalize our products and services – We improve your experience of our products and services by personalizing parts of our Sites and apps with the information you give us and what we learn about you. This includes showing you articles you may be interested in and recommending emails you may wish to sign up to. Where our Sites have such functionality, you can manage elements of personalization in your account.

To communicate product changes and offers – We want you to get the most out of our products and services, including showcasing our latest content and newsletters. We will contact you with carefully-curated Spectre Trading Limited offers and promotions, exclusive event invitations and feature announcements. For example, if there are no updates on topics you follow in your web alerts, we will send you articles on other topics that we think you might be interested in.

You are able to change your preferences at any time through your account or by contacting customer services. We also personalize our communications for strategic purposes.

To understand our users – We perform statistical, demographic and marketing analyses of Site users and their purchasing patterns for product development purposes. Spectre Trading Limited uses this information for analysis purposes, including analysis to improve customer relationships.

For the purposes of advertising – We rely on advertising revenue in part to support our journalism. We need to process your information to understand the effectiveness of the advertising we serve to you and others, and to deliver relevant personalized advertising. We use the information you give us and the information we collect about you to serve you with the most appropriate advertisements.

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

We disclose personal information to facilitate the running of our business or to provide specific services you have requested. Commonly, we will disclose information to:

Service providers – We engage service providers who help to support our business and improve our products. These service providers include, for example, fulfilment providers for delivery of our digital content and marketing; customer service agencies; organizations that host our Sites or databases; and providers of online surveys.

Advertisers – We, and our advertising partners, use cookies to collect personal information and serve you with advertisements that we believe are relevant to you and your interests. There is more specific information about our advertising partners and data sharing in our Cookie Policy.

Social media providers – We share the information of our subscribers with social media partners for the following reasons:

To create lookalike audiences for the purposes of targeted advertising on social media platforms;

Other users – Our Sites are publicly accessible and anyone around the world who accesses our Sites will be able to see anything you post, such as comments about an article. We encourage you to use a pseudonym when commenting on our Sites if you do not wish to be identifiable to other readers.

Legal processes and successors in title – We may transfer or disclose your personal information to any entity which takes over or acquires the relevant Spectre Trading Limited business. We also share aggregated, non-identifiable information with third parties. Before sharing this information, we ensure

that it cannot identify you as an individual. For example, we regularly release information about the size and growth of our audiences.

### **How long we retain your personal information**

We retain the majority of your personal information for as long as your account is active and therefore open; this allows you to continue accessing our content, products and services.

If you become inactive and are not a subscriber, we may delete elements of the information associated with your account. We will normally warn you if your access is going to be withdrawn and give you the opportunity to retain your account.

Where we don't need to keep all of your information in full, we will obfuscate or aggregate it, for example, web activity logs and survey responses. This is to ensure that we do not retain your information for any longer than is necessary.

It is sometimes necessary for us to keep your personal information for longer periods of time, for example:

If there is a statutory requirement to retain it;

If we require the information for legal reasons or there is a legitimate business need for us to retain it;

To ensure we do not contact you if you have asked us not to.

### **How we keep your personal information secure**

We have appropriate technical and administrative security measures in place to help ensure that our users' information is protected against unauthorized or accidental access, use, alteration, or loss. We use encryption technology, such as Transport Layer Security (TLS), to protect your personal information when you order products or services from us. More information about our approach to cyber security can be found in our Cyber Security Statement.

We operate a global business, so your personal information may be processed and stored outside the United States. For example, our global customer services team need to access information about you in order to respond to your queries.

### **Your rights**

Under data protection laws, you have rights as an individual in relation to the personal data we hold about you. These rights include:

- The right to object to direct marketing – your preferences, including in relation to direct marketing, can be found in your account;
- The right to access the personal data that we process about you;

- The right to request the deletion of your personal data;
- The right to request the rectification of your personal data – you can manage some of this information in your account.

You can exercise these rights through your account or by contacting customer services at [support@betverse.io](mailto:support@betverse.io).

These rights do not extend to processing and collection of personal data by journalists or for journalistic purposes.

### **Where this Privacy Policy applies**

Personal information is collected by Spectre Trading Limited, which is considered the “data controller” of your personal information under European Union and UK data protection law. Our address is Suite 305, Griffith Corporate Centre, Kingstown, St.Vincent and the Grenadines.

Our Sites are not intended for anyone under 16 years of age. We do not intentionally collect or use any information from anyone under 16 years old.

Our Sites may contain links to third party websites which are not subject to this privacy policy. We are not responsible for their content, use of personal information, or security practices.

If you have a query in regards to the processing of your personal information, please contact customer service directly at [support@betverse.io](mailto:support@betverse.io) .

### **Spectre Trading Limited**

Registered Office: Suite 305, Griffith Corporate Centre, Kingstown, St.Vincent and the Grenadines.

### **Changes to this Privacy Policy**

This policy is effective from November 29, 2018.

Any changes we may make to this privacy policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.