

SPECTRA PROTOCOL

Privacy Policy

Version dated February 12, 2026

1. Introduction

This Privacy Policy (the "**Policy**") for Perspective SAS, a French *société par actions simplifiée*, registered with the Paris Trade and Companies Register under number 801 407 453, and its related entities (the "**Company**", "**we**", "**us**", or "**our**"), describes the basis on which we may use and process personal information we collect from users of the Company's websites (spectra.finance and its subdomains), the web applications hosted at those websites (including but not limited to app.spectra.finance), and any tools, products, services, features, and functionalities available through these sites (collectively, the "**Services**"), in accordance with applicable law.

For the purposes of applicable data protection laws, the Company is the data controller. For the purposes of this Policy, "**you**" and "**your**" refer to you as the user of the Services. This Policy should be read in conjunction with our Terms of Use. Capitalized terms not defined in this Policy have the meanings given to them in the Terms of Use.

2. Data Controller

The data controller responsible for the processing of your personal data in connection with the Services is:

Perspective SAS

RCS Paris 801 407 453

Email: contact@spectra.finance

Website: <https://spectra.finance>

3. Data We Collect

We collect and process the following categories of data when you use the Services. We aim to minimize data collection and only collect data that is necessary for the operation and improvement of the Services.

3.1 Publicly Available Blockchain Data

When you connect your non-custodial Wallet to the Services, we collect and log your publicly-available blockchain address in order to learn more about your use of the Services and to screen your Wallet for any prior illicit activity. We screen your Wallet using intelligence provided by leading blockchain analytics providers. Note that blockchain addresses are publicly-available data that are not created or assigned by us or any central party, and by themselves are not personally identifying.

All transactions executed through the Protocol are recorded on the relevant blockchain and are publicly accessible. While we do not separately store on-chain transaction data, we may access publicly available blockchain data for analytics, compliance, and security purposes. You acknowledge that your blockchain address and associated transaction history are inherently public by virtue of the blockchain's transparent nature.

3.2 Information from Tracking Technologies

We and our third-party services providers may access and collect data from localStorage, device identifiers, cookies, web beacons, and other similar technologies to provide and personalise the Services for you across sessions. When you access the Services, we may automatically collect:

- IP address (which may be anonymized or truncated)
- Browser type and version
- Operating system and device type
- Referring website or source
- Pages visited and features used within the Services
- Date, time, and duration of visits
- Language preferences

3.3 Direct Communications

Whenever you reach out to us through email, social media, or other support channels like Twitter, Discord, or Telegram, or engage in surveys or questionnaires, we will receive the data and communications you share. It's important to note that we will not try to link any of this data to your wallet address, IP address, or any other personal details.

3.4 Data We Do Not Collect

The Services are non-custodial and designed with privacy in mind. We do not collect or have access to: your private keys, seed phrases, or Wallet passwords; your real-world identity documents (unless required for specific compliance procedures); your financial account details (bank accounts, credit cards); or biometric data.

4. How We Use Your Data

We take the protection of your personal data very seriously. We use the data we collect for the following purposes:

- **Providing and improving the Services:** To facilitate your interactions with the Protocol, display relevant pool data, positions, and rewards, analyze usage patterns, develop new features, and debug errors.
- **Safety and security:** To screen Wallet addresses for illicit activity, detect and prevent fraud, protect against security incidents, and enforce our Terms of Use.
- **Legal and regulatory compliance:** To comply with applicable legal obligations including sanctions screening, AML requirements, and responding to lawful requests from governmental authorities.
- **Communications:** To respond to your inquiries, provide support, and send important notices about the Services where permitted by applicable law.

- **Data anonymization and aggregation:** We may aggregate or anonymize your personal data so it no longer identifies you, and use this data for research and analytics purposes.

You may opt-out of direct marketing communications by writing to us at contact@spectra.finance.

5. Cookies and Tracking Technologies

We use cookies (small, often encrypted, text files stored on your device) to track how you use our Services and to remember your preferences. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your device until deleted).

- **Strictly Necessary:** Essential for the Services to work properly, including Wallet connection persistence, user preferences (selected network, interface settings), and security features.
- **Functional:** Enable technical performance and allow us to remember choices you make (language, display settings, previously connected Wallet).
- **Performance/Analytics:** Allow us to collect information about how you navigate the Services, which pages are visited, and how long you spend on the Services. Typically collected in aggregate or anonymized form.
- **Targeting/Marketing:** May be used to deliver relevant information about the Services or ecosystem updates. We do not serve third-party advertisements.

Cookies can be controlled, blocked, or restricted through your web browser settings. However, disabling cookies may impair your ability to use certain features of the Services.

6. Data Sharing and Disclosure

We do not sell your personal data. We may share or disclose data in the following circumstances:

- **Service providers and vendors:** Who assist us in operating the Services, including hosting, analytics, and customer support, under contractual obligations to maintain security and use data only for specified purposes.
- **Blockchain analytics providers:** To screen Wallet addresses for illicit activity and comply with sanctions regulations.
- **Regulators, government entities, and law enforcement:** To comply with legal obligations, respond to lawful requests, and protect the rights and safety of the Company and its Users.
- **Business transfers:** In the event of a merger, acquisition, or similar corporate transaction, subject to the commitments in this Policy.
- **With your consent:** When you have given explicit consent to share your data with third parties.

7. International Data Transfers

The Company is based in France. Your data may be transferred to, stored in, and processed in countries other than your country of residence. Where we transfer personal data outside of the European Economic Area (EEA), the United Kingdom, or Switzerland, we ensure that appropriate safeguards are in place, such as standard contractual clauses approved by the European Commission, adequacy decisions, or other mechanisms recognized under applicable data protection laws.

By the nature of blockchain technology, data submitted to the blockchain (including your Wallet address and transaction data) is distributed across a global network of nodes and cannot be restricted to any particular jurisdiction.

8. Data Security

We implement appropriate technical and organizational measures to protect your data against unauthorized access, alteration, disclosure, or destruction. However, given the inherent risks, we cannot guarantee absolute security. You acknowledge that you provide your data at your own risk.

9. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to comply with legal, regulatory, accounting, or reporting obligations. Automatically collected technical data is generally retained for up to twelve (12) months. Blockchain data may be retained for the duration of our legal obligations, as blockchain transactions are inherently permanent. When personal data is no longer needed, we will securely delete or anonymize it.

10. Your Rights

Depending on your jurisdiction, and in particular under the EU General Data Protection Regulation (GDPR) and the French *Loi Informatique et Libertés*, you may have the following rights:

- **Right of Access:** Request a copy of the personal data we hold about you.
- **Right to Rectification:** Request correction of any inaccurate or incomplete personal data.
- **Right to Erasure:** Request deletion of your personal data, subject to certain legal exceptions.
- **Right to Restriction:** Request restriction of processing in certain circumstances.
- **Right to Data Portability:** Receive your personal data in a structured, commonly used format.
- **Right to Object:** Object to processing based on legitimate interests or for direct marketing.
- **Right to Withdraw Consent:** Where processing is based on consent, withdraw it at any time.
- **Right to Lodge a Complaint:** Lodge a complaint with the CNIL (Commission nationale de l'informatique et des libertés) or your local supervisory authority.

To exercise any of these rights, please contact us at contact@spectra.finance.

Important Note on Blockchain Data: Due to the immutable nature of blockchain technology, data recorded on the blockchain (including Wallet addresses and transaction records) cannot be modified, deleted, or erased by the Company or any other party. Your rights of erasure and rectification apply only to data within the Company's control, not to data permanently recorded on the blockchain.

11. Legal Bases for Processing

We process your personal data on the following legal bases under the GDPR and applicable French data protection law:

- **Contract Performance (Art. 6(1)(b) GDPR):** Processing necessary for the performance of our agreement with you (the Terms of Use) and to provide you with the Services.
- **Legitimate Interests (Art. 6(1)(f) GDPR):** Processing necessary for our legitimate interests, including improving the Services, ensuring security, and conducting analytics, provided that such interests are not overridden by your rights.
- **Legal Obligations (Art. 6(1)(c) GDPR):** Processing necessary for compliance with legal obligations including sanctions screening and AML regulations.
- **Consent (Art. 6(1)(a) GDPR):** Where required, processing based on your freely given, specific, informed, and unambiguous consent.

12. Age Limitations

The Services are not intended for use by anyone under the age of 18. If we learn that we have collected personal data from a minor, we will take steps to delete such data promptly. If you believe that a minor has provided us with personal data, please contact us at contact@spectra.finance.

13. Third-Party Links and Services

The Services may contain links to third-party websites, applications, or services that are not owned or controlled by the Company. This Privacy Policy does not apply to any third-party services. We encourage you to review the privacy policies of any third-party services you access.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our data practices, legal requirements, or the Services. Any changes will be effective upon posting the revised Policy on our Sites, with the updated version date indicated at the top. Your continued use of the Services after changes constitutes acceptance of the updated Policy.

15. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

Perspective SAS

RCS Paris 801 407 453

Director of publication: Gaspard Peduzzi

Email: contact@spectra.finance

Website: <https://spectra.finance>

For Users in the European Economic Area, you may also contact the CNIL (Commission nationale de l'informatique et des libertés) or the data protection supervisory authority in your country of residence.