

PRIVACY POLICY

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At SPEEND.IO we process your personal data in accordance with applicable privacy laws and this Privacy Policy explains what information we collect about you, how we use it, and your rights. We have implemented different technical and organizational solutions to comply with applicable legislation related to the processing of personal data, privacy, and data security in countries where we operate or where the applicable law applies to us. The Privacy Policy sets forth the basic rules and principles by which we process your personal data, and mentions our responsibilities while processing your personal data according to transparency obligations.

For the purposes of this Privacy Policy, SPEEND.IO is the controller or responsible entity for the personal data processed in connection with the Website and Services, unless otherwise stated.

Our Services are not intended for persons under the age of 18. We do not knowingly collect personal data from children or persons under 18. If we become aware that we have collected such data, we will take reasonable steps to delete it, unless retention is required by applicable law.

1. LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

Any operation related to the processing of personal data must have a legal basis for the processing. We collect any data only on lawful grounds and only data that is necessary to provide our Services to you. We use the main four grounds to process your personal data: consent, contract, legal obligation, and legitimate interests.

Consent – freely given, informed, and unambiguous indication of your wishes to the processing of your personal data for a specific purpose which signifies agreement to the processing of personal data.

Contract – a legal ground for the processing of the personal data necessary for us to perform a contract or the Terms of Service to which you are a party or in order to take steps at your request prior to entering into the contract or the Terms of Service.

Legal obligations – a legal ground for the processing of personal data when there is an obligation to comply with a legal obligation to which we are subject;

Legitimate Interests – a legal ground for the processing of personal data when it is based on our legitimate interests or the legitimate interests of a third party, provided that those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.

Applicable laws have other legal grounds for the processing and when they are applicable we will use such grounds to process the personal data.

2. WHAT INFORMATION WE COLLECT

The types of personal data we may collect include:

– Identification and registration data, including full name, date of birth, nationality, country of residence, company name, company registration details, registered address, business address, director / representative details, UBO details, and other information required to create and maintain your account.

- Contact details, including email address, telephone number, messenger ID, mailing address and other communication details.
- KYC / KYB and AML information, including passport, national ID, proof of address, selfie, video verification, liveness check, corporate documents, ownership structure, director and UBO information, source of funds, source of wealth, business model description, licenses, website information and other documents or information required for identity verification, business verification, customer due diligence, enhanced due diligence and ongoing monitoring.
- Financial and transaction-related information, including wallet addresses, transaction history, transaction amounts, transaction hashes, crypto asset information, source of funds information, source of wealth information, payment details, settlement details and other information related to transactions carried out through or in connection with our Services.
- Technical and usage data, including IP address, browser type, operating system, device ID, device fingerprint, cookies, log data, website activity, session data and other technical information collected when you access or use our Website or Services.
- Geolocation data, including approximate location based on IP address or other technical information.
- Communication data, including emails, chats, support requests, tickets, messages, call records or recordings, and other communications with us, where applicable.
- Information from third-party sources, including public databases, corporate registries, credit bureaus, ID verification providers, KYC/KYB providers, sanctions screening tools, PEP and adverse media screening tools, blockchain analytics and transaction monitoring providers, analytics tools, resellers, channel partners, business partners and other third parties, where required or permitted by applicable law.

We do not intentionally collect card data unless this is necessary for a specific service and separately communicated to you. Where card payments or card-related services are processed by third-party payment providers, such providers may process card-related data in accordance with their own terms and privacy notices.

You provide most of the information directly to us. However, we may also obtain information about you from third-party sources where required or permitted by applicable law.

We collect and process such information for the purposes of account creation, provision of Services, identity verification, KYC/KYB, AML/CTF compliance, sanctions screening, fraud prevention, transaction execution, transaction monitoring, customer support, analytics, marketing communications where permitted by law, legal compliance, protection of our rights and enforcement of our Terms.

Please note that we will not be able to provide our Services to you if you refuse to provide information required for KYC/KYB, AML/CTF, sanctions screening, fraud prevention, transaction monitoring or other compliance purposes. In some cases, we may request additional information, documents or explanations for KYC/KYB, AML/CTF, source of funds, source of wealth or ongoing monitoring purposes.

Please note that processing of your data may include automated decision-making, including profiling. We may apply automated decision-making and profiling for onboarding, identity verification, account maintenance, fraud prevention, sanctions screening, transaction monitoring, risk scoring and compliance purposes.

3. LEGAL BASES AND PURPOSES OF PROCESSING

We will only process information that is necessary for the purpose for which it has been collected.

3.1. Consent rules and related purposes

Where you have provided your consent, we may use and process your information to contact you about offers, promotions, events, services, or information that we think will be of interest to you. We also process personal data we obtain from optional cookies that we set on the Website based on your consent. In case the legal basis is consent, you can withdraw your consent at any time via available options.

If you do withdraw your consent, and if we do not have another legal basis for the processing of your data, then we will stop the processing of your data and will delete it in specific situations, including in case you request the deletion of your personal data and we are obliged to delete your personal data according to the applicable law.

If we have another legal basis for the processing of your data, then we will continue to do so, subject to your legal interests and rights.

3.2. Contract rules and related purposes

We use and process your personal data where this is necessary to perform a contract or the Terms of Service with you and to fulfill and complete your transactions entered into with us or provide the Services.

3.3. Legitimate interests' rules and related purposes

We use and process your personal data as set out below where we must carry out activities for which it is in our legitimate interests as a business to do so.

User support: to respond to correspondence you send to us and fulfill the requests you make to us.

Promotion of our business: to contact you with marketing information in certain cases; to contact you with targeted advertising delivered online through social media, search engines, third-party websites or apps and applications, and other platforms operated by other companies unless you object or such activity requires your consent.

Communication with you: to communicate with you including to respond to queries, complaints, or claims and to manage legal and regulatory requests and requirements; to enforce or protect our legal rights or to establish, bring, or defend legal claims.

Administrative and technical aspects: for network and information security purposes; to comply with a request from you in connection with the exercise of your rights; to inform you of updates to our terms and policies; for cookies that are essential for our Website to function properly.

Analytics: to evaluate user behavior, including understanding the effectiveness of existing product features, plan new features, or measure audience size or characteristics

Preventing frauds, illegal activity, or any violation of the Terms of Service or Privacy Policy: We may disable access to the Website, and erase or correct personal data in some cases.

3.4. Legal obligation' rules and related purposes

We will process your personal data to comply with our legal or regulatory requirements, for example, anti-money laundering (AML), and know your client (KYC) rules.

4. HOW DO WE PROCESS PERSONAL DATA?

We share your data with our contractors provided these third parties assume confidentiality obligations regarding your personal data and have sufficient and appropriate safeguards of data protection.

4.1. Disclosure of personal data

In some circumstances, we may disclose or transfer your personal data to the following categories of third parties:

- KYC/KYB, KYT, blockchain analytics, AML, sanctions screening and identity verification providers, including AMLBot;
- liquidity providers, crypto exchanges, OTC desks, payment providers, banks, financial institutions and other counterparties involved in providing the Services;
- hosting, IT, cybersecurity, analytics, communication, customer support and operational service providers;
- professional advisers, auditors, consultants, legal advisers and contractors;
- government authorities, regulators, law enforcement agencies, courts or other competent authorities where required or permitted by law.

4.2. Sharing of personal data

We share information for the following purposes:

- to provide our Services to you or to administer them;
- to comply with any applicable laws or regulations,
- to detect and investigate fraudulent or unlawful activity and respond to claims and legal process;
- to prevent or stop activity we consider to be, or to pose a risk of being, illegal, unethical, or legally actionable or that poses a threat to the safety of you, another person, or the public generally;
- in case of any reorganizations of our company or transfer of control with the transfer of all information to the relevant third party.

4.3. Purposes of the processing of personal data

We process personal data for the following main purposes:

- Providing services. Legal basis: Contract.
- Providing newsletters/offers/updates which may be interesting to you. Legal basis: Consent for newsletters; Legitimate Interests for offers and updates.
- Compliance with applicable anti-money laundering and know your client's rules. Legal basis: Legal obligation.
- Keeping the Website running (managing your requests, remembering your settings, hosting, and back-end infrastructure). Legal basis: Legitimate Interests.
- Preventing fraud, illegal activity, or any violation of the terms or Privacy Policy. We may disable access to the Website, and erase or correct personal data in some cases. Legal basis: Legitimate Interests.
- Operating and improving the Website (testing features, interacting with feedback platforms, managing landing pages, heat mapping the App, traffic optimization, and data analysis and research, including profiling and the use of machine learning and other techniques over your data and in some cases using third parties to do this). Legal basis: Legitimate Interests.
- Customer support (notifying you of any changes to the Website, or services, solving issues, any bug fixing, sending you announcements, updates, and security alerts, which we send through a push notification, and responding to your requests, questions, and feedback). Legal basis: Legitimate Interests.

5. DATA RETENTION PERIOD AND DATA SAFETY

We store your personal data in accordance with the legal requirements.

We will keep your personal data for as long as it is necessary for the purposes set out in this Privacy Policy.

We keep information that we need to resolve any disputes, enforce our contracts, agreements, and terms with you, and provide you with the possibility to use our Services, protect legal rights, and comply with technical and legal requirements and constraints related to the security and operation of our Services for as long as it is reasonably necessary or required.

KYC/KYB, AML/CTF, sanctions screening, transaction monitoring and related compliance records may be retained for at least five (5) years after termination of the business relationship or completion of the relevant transaction, or for a longer period where required or permitted by applicable law.

6. INTERNATIONAL DATA TRANSFERS

Your personal data may be transferred to, stored or processed in countries other than the country where you are located, including countries where our service providers, partners, contractors, compliance tools, hosting providers, banks, payment providers, crypto service providers or other counterparties are located.

Where required by applicable law, we implement appropriate safeguards for such transfers, including contractual, technical and organizational measures designed to protect your personal data.

7. HOW DO WE KEEP PERSONAL DATA SAFE

We have implemented appropriate technical, procedural, and organizational security measures designed to protect the security of any personal data we process. We regularly monitor our systems for possible vulnerabilities and attacks. Your information is stored on secure servers. We restrict access to your personal data to those employees who are trained and instructed, have a business reason to access, and have professional skills that allow them to work with your personal data. Access control and encryption are the key technologies for protecting data.

Additionally, data passing over networks, including the Internet, are encrypted with HTTPS, security audits, and other technologies. In addition, data is encrypted when it is stored or "at rest" within servers and hard drives as well.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet and information storage technology can be guaranteed to be 100% secure, so we cannot promise and guarantee that hackers, cybercriminals, or unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal data, the transmission of personal data to and from our Website is at your own risk. You should only access the Website within a secure environment.

8. YOUR DATA PROTECTION RIGHTS

You can exercise the following rights by contacting us.

You have the right to access information about you, especially:

- the categories of data;
- the purposes of data processing;
- third parties to whom the data is disclosed;
- how long the data will be retained and the criteria used to determine that period;
- other rights regarding the use of your data.

The right to access information may be performed only by you or your legal representative. In case you request the right to access information via a legal representative, you have to provide proof of whether such a person may represent you.

You have the right to make us correct any inaccurate personal data about you.

You can object to using your personal data for profiling or making automated decisions about you. We may use your data to determine whether we should let you know the information that might be relevant to you.

You have the right to restrict processing – you have the right to ask us to restrict the processing of your personal data in certain circumstances.

You have the right to the data portability of your data to another service or website. We will give you a copy of your data in a readable format so that you can provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you.

You have the right to be “forgotten”. You may ask to erase any personal data about you if it is no longer necessary for us to store the data or in other certain circumstances.

9. COOKIES

A cookie is a small piece of data that is stored on your computer or mobile device. We use cookies and similar technologies to collect additional Website usage data and to operate our Services. Our Services use cookies to distinguish you from other users. This helps us to provide you with a good experience and allows us to improve our Services.

We collect, process, and analyze data regarding the use of our Website. Traffic data is data connected to visitors on the web page and data handled in communication fields for sending, distributing, or making messages available.

We use necessary, preferential, statistical, and marketing cookies. For more information, you may contact us.

10. CONTACT

If you have any questions about the Privacy Policy, or your personal data, please contact us using the following email: support@speend.io