

Spectral TMS SAS. (“Spectral TMS”) Privacy Policy

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The Spectral TMS Privacy Policy describes the privacy practices of Spectral TMS’s apps and websites.

Spectral TMS SAS is a French company, and the laws of France apply.

Please note that in order to use our apps and websites, you authorize Spectral TMS to transfer your personal information across national borders to other countries where Spectral TMS also operates. We will only transfer your personal information to these countries where permitted to do so by law and we will take steps intended to ensure that your personal information continues to receive appropriate protections.

What does this privacy policy cover?

This privacy policy describes the privacy practices of Spectral TMS’s websites, as well as our desktop apps and mobile apps that include a link to this policy (in this policy, we refer to our desktop apps and mobile apps together as “apps”). This privacy policy also applies to Spectral TMS’s marketing and advertising practices. Please also see any additional Terms of Use or Product License Agreements that may apply to the app or website you are using. This policy does not cover the processing of personal information where we are acting as a data processor for one of our customers; in that case our customer will be the data controller.

What information does Spectral TMS collect about me?

Spectral TMS ID, registration, and customer support

When you register to use a Spectral TMS app or website, create a Spectral TMS user ID, or contact us for support or other offerings, Spectral TMS collects information that identifies you. This includes information such as your name, company name, and email address. We may also sometimes collect other information that does not identify you, such as which types of apps you’re interested in. Some of this information is required and other information is optional. To help keep our databases current and to provide you the most relevant content and experiences, we may combine information provided by you with information from other sources, in accordance with applicable law. For example, from these sources, we may learn about the size, industry, and other information about the company you work for.

Spectral TMS apps and websites

We collect information about how you use our apps and websites. We may collect information sent by your browser or device to our servers whenever you visit a Spectral TMS website or use a Spectral TMS app. For example, your browser or device may tell us your IP address (which may tell us generally where you are located) and the type of browser and device you used. When you visit a Spectral TMS website, your browser may also tell us information such as the page that led you to our website and, if applicable, the search terms you typed into a search engine that led you to our website. Spectral TMS may collect information about how you use our websites and apps by using cookies and similar technologies, and our servers may collect similar information when you are logged in to the app or website. Depending on the app or website, this information may be anonymous (for example, see the spectraltms.com) or it may be associated with you. If you use the service to make a recording, that recording may include personal information such as images of you. Also, we use automated systems to analyze your content using techniques such as machine learning in order to improve our apps and websites. This analysis may occur as the content is sent or received using an online feature of a Spectral TMS app or website, or when the content is stored on Spectral TMS servers. During app use, the app gathers information such as physical location, screenshots, videos, notes, checklists, annotations, call data, and crash reports.

Spectral TMS app activation and automatic updates

When you activate your Spectral TMS app or when you install updates to the app, we collect certain information about your device (including your IP address), the Spectral TMS app, and your product serial number (learn more). Some of our apps include features that connect to our servers and offer you the ability to install updates to the app. We may keep track of information such as whether the update was successful or not. We may use the information collected through activation or app updates to validate your copy of the app and confirm that it is genuine and properly licensed.

Spectral TMS emails

Emails we send you may include a technology (called a web beacon) that tells Spectral TMS whether you have received or opened the email, or clicked a link in the email. If you do not want us to collect this

information from Spectral TMS marketing emails, you can opt out of receiving Spectral TMS marketing emails.

Buttons, tools, and content from other companies

Spectral TMS apps and websites may include buttons, tools, or content that link to other companies' services (for example, a Facebook "Like" button). We may collect information about your use of these features. In addition, when you see or interact with these buttons, tools, or content, or view a Spectral TMS web page or app containing them, some information from your browser may automatically be sent to the other company. Please read that company's privacy policy for more information.

Spectral TMS social networking pages and social sign-on services

Spectral TMS has its own pages on many social networking sites (for example, the Spectral TMS® team's Facebook page). We may collect information when you interact with our social networking pages.

How does Spectral TMS use the information it collects about me?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal information other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the contact details set out below

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us at <https://www.spectraltms.com/> if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our

services, to develop them and grow our business)

To administer and protect our business, Website and App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(a) Identity (b) Contact (c) Technical

(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)
(b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

(a) Identity (b) Contact(c) Profile(d) Usage(e) Marketing and Communications (f) Technical

Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, services, marketing, customer relationships and experiences

(a) Technical (b) Usage

Necessary for our legitimate interests (to define types of customers for our services, to keep our Website and App updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about services that may be of interest to you

(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile

Necessary for our legitimate interests (to develop our services and grow our business

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile.

We may also use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria and may combine your information with other profile data it has obtained from other sources.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using the details set out below.

Performance of Contract means processing your information where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

What are cookies and how does Spectral TMS use them?

As with most websites, Spectral TMS uses cookies and similar technologies to make our websites work as well as to learn more about our users and their likely interests.

Does Spectral TMS share my personal information?

Spectral TMS works with companies that help us run our business. These companies provide services such as delivering customer support and sending emails on our behalf. In some cases, these companies have

access to some of your personal information in order to provide services to you on our behalf. They are not permitted to use your information for their own purposes.

Spectral TMS may also share your personal information:

- When you agreed to the sharing
- Within the Spectral TMS family of companies for purposes described in this privacy policy (Spectral TMS SAS)
- With our resellers and other sales partners if you are a business customer and agreed to receive Spectral TMS marketing communications. Note that we do not share personal information about consumers with third parties for their own marketing purposes unless the consumer agreed to that sharing
- When we are required to provide information in response to a subpoena, court order, or other applicable law or legal process
- When we have a good faith belief that the disclosure is necessary to prevent or respond to fraud, defend our apps or websites against attacks, or protect the property and safety of Spectral TMS, our customers and users, or the public
- If we merge with or are acquired by another company, sell a Spectral TMS website, app, or business unit, or if all or a substantial portion of our assets are acquired by another In those cases your information will likely be one of the assets that is transferred

We may share or publish aggregate information that doesn't specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use the Spectral TMS apps.

Is my personal information displayed anywhere on Spectral TMS's websites or applications?

There are several places within Spectral TMS's websites and apps that allow you to submit content for others to see. Sometimes you can limit who can see what you share, but there are some places where what you share can be seen by the general public or other users of the app or website.

Please be careful when you share your personal information. Do not share anything you wouldn't want publicly known unless you are sure you are posting it within an app or website that allows you to control who sees what you post.

To remove content you have shared on our websites and apps, please use the same app or website feature you used to share the content. If another user invites you to participate in shared viewing, editing, or commenting of content, you may be able to delete your contributions, but usually the user who invited you

has full control. If you have questions or concerns about this, or if you have specific GDPR requests, please contact us at contact@spectraltms.com.