



## **Data Privacy**

Spectrum Center processes personal data (e.g. name, address, e-mail address, telephone number) in accordance with applicable data protection law. While Spectrum Center has implemented measures to help ensure the protection of personal data processed via this website, full proof protection against a potential data breach cannot be guaranteed. As an alternative to using the options for transmitting personal data to us through this website, you can send us your information over the telephone or postal mail. Below is our contact information:

Spectrum Center Inc.  
1451 Dolley Madison Blvd.  
Ste. 320  
McLean, VA 22101  
United States of America  
Tel: +1 703-848-4750  
E-mail: [support@spectrum.center](mailto:support@spectrum.center)

Please make sure to include your full legal name, your physical address and contact details (telephone and e-mail).

## **Purpose and Scope**

All personal data collected by this website is collected in a manner that is in line with General Data Protection Regulation (GDPR).

The personal data we collect may be used for the following purposes:

- Marketing
- Customer support
- Human Resources
- Finance
- Webinars
- Product fulfillment
- Training courses

Our legal basis for the processing of personal data:

- Contractual
- Consent
- Legal obligation
- Vital interests
- Legitimate interests



Any legitimate interests pursued by us, or third parties we use, are as follows:

- For existing business to business customers, we will market our services to you based on commercial legitimate interest. You will always have the option to object to your data being processed in this way.

Special categories of personal data are not collected, stored or processed by Spectrum Center.

### **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for Spectrum Center to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

You may withdraw consent at any time by opting out of marketing through the unsubscribe link in e-mails or by contacting us at [support@spectrum.center](mailto:support@spectrum.center).

### **Disclosure**

Spectrum Center will not pass on your personal data to third parties unless explicit consent has been given or the data is to be processed under the contractual agreement that's been made with the data subject.

### **Retention period**

Spectrum Center will process personal data only for as long as it is required and necessary for the purpose it was originally collected. At the end of the retention period, personal data will be deleted or anonymized. If data is anonymized, no personally indefinable information will be retained, leaving only statistical data which may be used for analysis or business planning.

### **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.



- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: if Spectrum Center refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the section on Complaints below.

All the above requests will be forwarded should there be a third party involved (as stated above) in the processing of your personal data.

### Complaints

If you wish to complain about Spectrum Center's processing of your personal data or how your complaint was handled, you can contact the supervisory authority and Spectrum Center's GDPR Owner directly.

Because Spectrum Center is based in the U.S., GDPR Article 27 applies. Any European Union (EU) supervisory authority where affected data subjects are located may take jurisdiction.

Spectrum Center's GDPR Owner is the following:

Contact Name: GDPR Owner  
Address line 1: 1451 Dolley Madison Blvd.  
Address line 2: Ste. 320  
Address line 3: McLean  
Address line 4: Virginia  
Address line 5: 22101  
Address line 6: United States of America  
E-mail: [support@spectrum.center](mailto:support@spectrum.center)  
Telephone: +1 703-848-4750

### On-line privacy statement

#### Personal data

Under the EU's GDPR personal data is defined as:

*“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural persona is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification*



*number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”*

#### How we use your information

This privacy notice tells you how Spectrum Center will collect and use your personal data.

- We will collect and process your personal information to facilitate any orders we receive for our products.
- We will use your data to provide services as part of any contract you enter with us. We will use this data to contact you relating to your account and business you do with us.
- Personal data may also be used to see how you browse our website. We will use cookies to collect this information which may store your IP address. Some data is used for holistic purposes to improve customer experience.
- We may use your personal data to deal with any complaints you may have with us.

#### Why does Spectrum Center need to collect and store personal data?

For us to provide you with a service, we need to collect personal data for providing that service. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes, Spectrum Center will provide you with information we think is relevant based on your service and previous purchases with us. You may object to your information being processed in this way. This only applies to existing business customers.

When you contact us through our “Contact Us” form on our website, we will process your data to provide you with a response to your inquiry.

#### Will Spectrum Center share my personal data with anyone else?

Spectrum Center may provide your personal data to third-party service providers who are contracted to assist in delivering our services, as well as in the execution of our sales and marketing activities. These third parties are required to maintain the confidentiality and security of your personal information and are permitted to use your data solely for the purpose of carrying out the service on Spectrum Center’s behalf.

Once these service providers no longer require your personal data to fulfill their contractual obligations, they are responsible for disposing of your information in accordance with Spectrum Center’s established procedures.



In the case of sensitive personal data, Spectrum Center will only share such information with a third party after obtaining your explicit consent, unless there is a legal obligation that requires us to do so.

How will Spectrum Center use the personal data it collects about me?

Spectrum Center will handle your information—in terms of collecting, storing, and using it—in line with the EU's General Data Protection Regulation (GDPR). We aim to keep your details accurate and current, and we will not retain them longer than necessary. Spectrum Center must keep certain records as required by law, such as those needed for income tax and auditing. The length of time personal data is kept may also depend on specific requirements for different industries and accepted practices. In some cases, personal data could be retained beyond these periods if business needs require it.

Under what circumstances will Spectrum Center contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. The information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organization holds about me?

Spectrum Center, at your request, can confirm what information we hold about you and how it is processed. If Spectrum Center does hold personal data about you, you can request the following information:

- Identity and contact details of the person or organization that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Spectrum Center or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organization, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.



- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Spectrum Center accepts the following forms of ID when information on your personal data is requested:

- *Passport and driver's license.*

***Document Owner and Approval***

The GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.