

## Privacy Policy

**1. Introduction** This Privacy Policy outlines the principles of processing and protecting personal data of users visiting the following websites:

- <https://spereventure.com/>
- <https://spere-group.com/>
- <http://spere-group.com/travel>
- <http://spere-group.com/security>
- <http://spere-group.com/risk-management>

We care about users' privacy and ensure compliance with applicable regulations, including the GDPR.

**2. Data Controller** The data controller is Spere Group, headquartered at [company address], email: info@spere-group.com, phone: +218 910 269 988.

**3. Scope of Collected Data** While using our websites, we may collect the following data:

- Name and surname,
- Email address,
- Phone number,
- IP address,
- Data collected through cookies.

**4. Purpose of Data Processing** Personal data is processed for the purpose of:

- Providing services offered on the websites,
- Handling user inquiries,
- Marketing and website traffic analysis,
- Ensuring security and protection against unauthorized access.

**5. Legal Basis for Processing** Data is processed based on:

- User consent (Article 6(1)(a) GDPR),
- Necessity for contract performance (Article 6(1)(b) GDPR),
- Legal obligation (Article 6(1)(c) GDPR),
- Legitimate interest of the controller (Article 6(1)(f) GDPR).

**6. Data Recipients** Personal data may be shared with:

- Entities cooperating in service provision,
- Providers of analytical tools,
- Government authorities as required by law.

**7. Data Retention** We retain data for the period necessary to fulfill the processing purposes, but no longer than required by law.

**8. User Rights** Each user has the right to:

- Access their data,
- Rectify data,
- Erase data ("right to be forgotten"),
- Restrict processing,
- Data portability,
- Object to processing,
- Lodge a complaint with the supervisory authority.

**9. Cookies** Our websites use cookies to improve usability and analyze traffic. Users can manage cookie settings in their browser.

**10. Changes to the Privacy Policy** We reserve the right to modify this policy. The current version will be published on our websites.

**11. Contact** For questions regarding personal data processing, please contact us at [info@spere-group.com](mailto:info@spere-group.com) or phone: +218 910 269 988.