

## **WORLDCOIN PRIVACY STATEMENT**

Thank you for choosing to be part of the Worldcoin Community!

This Privacy Statement covers the data you provide to us through your use of Worldcoin's websites, applications, and protocol, and other services linked to this Privacy Statement (collectively, the "Services"). Section 4 below outlined the data we collect and why. This Privacy Statement is incorporated into and governed by the Worldcoin User Terms and Conditions ([getworldcoin.com/terms](https://getworldcoin.com/terms)).

For information on how we collect, use, store, and delete your biometric data collected through our Orb, please review the [Data Consent Form](#), incorporated by reference. We will not collect your biometric data unless you agree to the [Data Consent Form](#).

### **1. Updates to this Privacy Statement**

We update this Privacy Statement sometimes. If we make major changes, such as how we use your personal information, then we'll let you know via an email or a message in your Worldcoin app.

### **2. What is in this Privacy Statement?**

- Our commitment to protecting your privacy and data
- Information we collect and why
- How we use the data we collect
- Where we process your data
- When we share your data
- How your data is recorded on public blockchain
- How we use cookies
- How long we keep your data
- How this Privacy Statement differs for children and teens
- How to contact us about this Privacy Statement

### **3. Our Commitment to Protecting your Privacy and Data**

We are deeply committed to protecting your privacy and securing your data:

#### **Privacy**

We expressly designed our products and services with your privacy in mind. When we collect data, we do so to improve our product and services. We will always tell you, here in this Privacy Statement or in data consent forms for specific products or services, what data we are collecting, why we are collecting that data, and what we do with it.

#### **Data Security**

We have a dedicated team to look after your data and have implemented physical and electronic safeguards that protect your data both in transit and at rest. At the same time, no service can be completely secure - if you have any concerns about your account or your data, please contact us through our [Request Portal](#) or write to us at Tools For Humanity Corporation, 548 Market Street, PMB 49951, San Francisco, CA 94104 USA.

Our commitment to your privacy and data security extends beyond what is required by law and covered in most privacy statements. At Worldcoin, we recognize that we can only fulfill our mission of distributing Worldcoin fairly to as many people as possible if people trust us, and privacy and data security are central to earning your trust.

## 4. Information We Collect and Why

### 4.1 Data You Provide To Us

As a user, you are not required to provide any data to access the Worldcoin app. However, you may need to provide us with certain data in order to use a feature within the Services. Below is a list of data that you can provide and what we may use the data for:

- **First and last name:** You may choose to enter your name to associate it with your account. Worldcoin and other users may see your name when they choose to interact with your account. We may require your name when you submit a data subject request.
- **Email address:** You may choose to enter your email to associate it with your account. We may require your email when you submit a data subject request.
- **Phone number:** You may choose to enter your phone number to associate it with your account. With your permission, other users may be able to find your account through your phone number. We may require a phone number when you submit a data subject request.
- **Feedback and correspondence from you:** These include any emails, chat messages, or other communications that you send us via email or third-party social media websites.
- **Address book contacts:** You may provide us with access to your address book to enable the feature that makes it easy for you to find and interact with other users who may be in your address book.

**Please note:** You are responsible for ensuring that sharing your contacts' information complies with applicable laws. This may require that you obtain your contacts' permission. We may also get information about you from other users importing or entering their contacts. We use and may store this contact information to help you and your contacts connect through our Services. You can change your mind and turn off our access to your contacts at any time in your device settings. If you elect to import your device's address book contacts to find out which of your contacts uses our Services or invite them to join you in using our Services, we will periodically sync your contacts' information, including phone number and email, to our servers.

If you have a business relationship with us (such as if you are an Orb Operator or a supplier), then we may require information such as names, mailing address, email, phone number, wallet address, and other documentation (such as your government ID) as part of furthering that business relationship and to satisfy our know-your-customers obligations. We may use third-party services, such as Onfido, to help us collect and review the information and documentation above to satisfy the know-your-customers obligations.

### 4.2 Data We Collect From Third-Party Sources

From time to time, we may obtain information about you from the following third-party sources:

- **Blockchain Data.** We may analyze public blockchain data to ensure parties utilizing our Services are not engaged in illegal or prohibited activity under our Worldcoin User Agreement, and to analyze transaction trends for research and development purposes.
- **Identity Verification Services.** We may obtain information from third-party services using your data to verify your identity if required by law (such as applicable know-your-customer requirements). To clarify, we do **not** use your biometric data when we verify your identity as required by law.

### 4.3 Location Information

If you decide to enable a location-based service (such as a feature allowing you to find an Orb Operator near you), then we may collect information about your location so we can provide such a service. Your location can be determined by:

- GPS
- IP address
- Information about nearby cell towers and Wi-Fi access point information

The type of location data collected depends on the service you are using, the device you're using (for example, Apple or Android), and your device's settings (whether permissions are enabled or disabled). You can change your permissions any time in your device's settings.

#### 4.4 Data We Collect Automatically

If permitted under applicable law, we may collect certain types of data automatically when you interact with our Services. This information helps us address customer support issues, improve the performance of the Services, provide you with a streamlined and personalized experience, and secure your Account credentials. Information collected automatically includes:

- **Online Identifiers:** Geo-location and tracking details (see above), computer or mobile phone operating system, web browser name and version, and IP addresses
- **Usage Data:** Authentication data, security questions, public social networking posts, and other data collected via cookies and similar technologies

Similarly, the Worldcoin mobile application gathers information for troubleshooting and improvement. We use third-party services, such as Segment.io or PostHog, to view aggregated information about end user usage and interactions. Where possible, we take steps to minimize or mask the information sent to third parties (such as encoding the data).

#### 4.5 Anonymized and Aggregated Data

Anonymization is a data processing technique that modifies personal data so that it cannot be associated with a specific individual. Examples of anonymized data include:

- Transaction data
- Click-stream data
- Performance metrics
- Fraud indicators

We also aggregate data, combining large amounts of information together so that it no longer identifies or references an individual. We use anonymized or aggregate data for our business purposes, such as understanding user needs and behaviors, improving our Services, conducting business intelligence and marketing, detecting security threats, and training our algorithms.

#### 4.6 Biometric Data

We will only collect and use your biometric data after you agree to the [Data Consent Form](#), which details the types of biometric data we process and why. The biometric data is **not** linked to your account data in Section 4 above.

### 5. How We Use the Data We Collect

We must have a valid reason (or "lawful basis for processing") to use your personal information. When it comes to your biometric data, we ask for your explicit consent. However, in instances when you'd reasonably expect us to use your personal information and our use of that information complies with applicable laws, we don't ask for your permission.

We use your information for the following types of purposes:

- Providing our Services to you, as well as information about our Services;
- Conducting research to develop and improve our product;
- Training our algorithm to better recognize unique users;
- Analyzing your use of our Services to provide better support;
- Using your wallet address to send you WLD tokens or other cryptocurrencies that we support;

- Complying with applicable laws (such as using your IP address to block individuals whose country does not allow them to access the Services);
- Handling your requests, complaints and inquiries;
- Resolving disputes, troubleshooting issues, and enforcing our agreements with you, including this Privacy Statement and the Worldcoin User Agreement; and
- Contacting you regarding updates to the Services.

## 6. Where We Process Your Data

**Please note:** When you provide us with your data, it may be transferred, stored, or processed in a location outside of where your data was originally collected. The country in which your data is transferred, stored, or processed may not have the same data protection laws as the country in which you initially provided the data.

We adhere to the principles stated in the European Union's General Data Protection Regulation (GDPR), even when not required. For example, when we work with data processors that operate outside the European Economic Area (EEA) and United Kingdom, we ensure that they are in compliance with GDPR and the United Kingdom's Data Protection Act of 2018. We only share data with data processors outside of the EEA and United Kingdom if such a transfer is lawful and if we are confident that the data processor will protect your data as required under applicable laws and, further, in accordance with Worldcoin's standards.

## 7. When We Share Your Data

**We will never sell your data.**

When we share your data outside of Worldcoin, we will always:

- Share it in a secure way;
- Make sure that it is handled in a manner that is consistent with our commitment to your privacy ; and
- Prohibit other companies from using it for their own marketing purposes.

We do share your data, both within Worldcoin and with those outside of Worldcoin, in these limited ways:

- **Within Worldcoin:** We only disclose data to Worldcoin team members who require access in order to perform their tasks and duties. We only disclose as much data as is needed to perform specific tasks and duties.
- **With vendors and service providers outside of Worldcoin:** We only disclose data to service providers whose services we rely on in order to process the data and provide our Services to you. We only disclose data with Identity Verification Vendors if required by Law (i.e., know-your-customer-requirements). The data we provide to Identity Verification Vendors does not include any biometric data.
- **With law enforcement, officials, or other third parties:** We may disclose your data in order to comply with applicable laws and respond to mandatory legal demands. We will carefully consider each request to determine whether the request complies with the law, and we will not hesitate to challenge invalid, overbroad, or unlawful requests. We will only share your data with law enforcement, officials and other third parties if we are compelled by a subpoena, court order, or similar procedure.
- We may also disclose your data when we believe in good faith that such disclosure is necessary to prevent harm to us or others, to report suspected illegal activity, to investigate violations of the Worldcoin User Agreement and other applicable policies, or to enforce such and to enforce such agreements.

## 8. How Your Data is Recorded on Public Blockchain

Transaction information related to your use of Worldcoin's services may be recorded on a public blockchain.

**Please note:** Many blockchains are open to forensic analysis, which can lead to de-anonymization and the revelation of private financial information. Blockchain data (such as a wallet address or IP address) can be combined with personal information, making it possible

to associate public blockchain transactions with a specific individual.

## 9. How We Use Cookies

We use cookies to help our Services work better. In addition to cookies, we may use other similar technologies, like web beacons, to track users of our Services. Web beacons (also known as "clear gifs") are tiny graphics with a unique identifier, similar in function to cookies. They are used to track the online movements of web users.

In contrast to cookies, which are stored on a user's hard drive or device, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We and our third-party service provider employ web beacons for the reasons stated below, but primarily to help us better manage content on our Services by informing us which content is effective.

We may also use so-called "Flash Cookies" (also known as "Local Shared Objects" or "LSOs") to collect and store information about your use of our services, prevent fraud, and support other site operations.

Together, these tools allow us to:

- Perform website analytics;
- Prevent fraud and prevent attacks against our websites and Services; and
- Advertise our Services, and additional products and services from our third-party partners.

We use cookies and trackers to assign you a unique identifier so we can record:

- Websites you visit
- Duration of your visit, including the amount of time an advertisement or webpage was visible
- Your IP Address

You can block cookies at any time using your web browser settings, but doing so may limit your browsing experience and your ability to use certain features of the Services. We do not currently respond to "Do Not Track" or DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

We use the following types of cookies:

**Strictly Necessary Cookies:** These cookies are necessary for the Services to function and cannot be switched off in our systems. They are usually only set in response to actions made by you that amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. These also include cookies we may rely on for fraud prevention. You can set your browser to block or alert you about these cookies, but some of the Services may not work.

**Performance/Analytics Cookies:** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Services. They help us understand page popularity and visitors movement around the Services. All information these cookies collect is aggregated and is therefore anonymous. If you do not allow these cookies, we will not know when you have used our Services and will not be able to monitor performance.

**Functionality Cookies:** These cookies allow us to remember the choices you make and to tailor our Services so we can provide relevant content to you. For example, a functionality cookie can remember your preferences (e.g., country or language selection), or your username.

**Targeting/Advertising Cookies:** Worldcoin uses third-party service providers to display advertising on our Services and serve advertising on other third-party sites that may be relevant to you or your interests. These cookies are also used to help measure the effectiveness of an advertising campaign. They remember that you have visited a website and this information may be shared with other organizations, such as advertisers. This means that after you have been to our websites, you may see advertisements about our Services elsewhere on the Internet. The information collected through this process by the third-party service providers does not enable us or them to identify your name, contact details, or other personal information that directly identifies you unless you choose to provide this information. Such advertising will only be delivered where permitted by applicable laws. If you do not allow these cookies, you will

experience less advertising tailored to your inferred interests on our websites and will not receive targeted Worldcoin advertisements on third-party websites.

Worldcoin also uses Google Analytics. More information on how Google uses your data when you use its partners' websites and applications: <https://www.google.com/policies/privacy/partners/>. Your use of the Services is evidence of your consent to Worldcoin storing and accessing cookies and other data on your computer or mobile device and Worldcoin's use of Google Analytics in connection with such activities. Please read the information at the link provided so you understand what you are consenting to.

#### **10. How Long Do We Keep Your Data?**

We retain your data for as long as is reasonably necessary to provide our Services to you, serve our legitimate business purposes, and comply with our legal and regulatory obligations. If you close your account with us, we will continue to retain your data as necessary to comply with our legal and regulatory obligations, including fraud monitoring, detection, and prevention, as well as tax, accounting, and financial reporting obligations.

**Please note:** Blockchains are decentralized third-party networks that are not controlled or operated by Worldcoin. Due to the public and immutable nature of blockchain technology, we cannot amend, erase, or control the disclosure of data that is stored on blockchains.

#### **11. How this Privacy Statement Differs for Children and Teens**

Individuals under the age of 18 are not allowed to use the Services, and we do not knowingly collect data from individuals under the age of 13 in violation of the Children's Online Privacy Protection Act. If you believe that your child under the age of 13 has gained access to the Services without your permission, you may request the deletion of their data by contacting us through our [Request Portal](#).

If we learn that we have collected data about a child under age 13, we will delete such data as quickly as possible. We have taken commercially reasonable steps to restrict use of the Services to those who are at least 16 years old. We do not market products or services for purchase by children.

#### **12. How to Contact us About this Privacy Statement**

You may choose to delete your data from within the Worldcoin app. If you have questions or concerns regarding this Privacy Statement, wish to exercise your rights, or to contact our Data Privacy Officer, please submit your request through our [Request Portal](#) or write to us at Tools For Humanity Corporation, 548 Market Street, PMB 49951, San Francisco, CA 94104 USA. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can also delete your data from within the Worldcoin application.

If you have an unresolved privacy or data use concern that we have not satisfactorily addressed, please contact the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).