

WORLDCOIN SENSITIVE BIOMETRIC DATA CONSENT FORM

Brief Summary.

This summary is intended to help you quickly understand what you are being asked to agree to when you sign up at an Orb. If you require more information, you can review the full text of the consent, provided below.

You do not have to agree to this Sensitive Data Consent Form in order to take part in Worldcoin.

Here are your options:

Options	Impact	Specifics
#1. Don't Agree to this Sensitive Data Consent Form	Less Data Collected, but Less Functionality	You can create an account and establish a Worldcoin wallet, but you will not be able to participate in certain aspects of Worldcoin, such as receiving a small amount of WLD for free or establishing a unique, portable digital identity. Like every Worldcoin user, you still must agree to Worldcoin's Privacy Statement and User Terms and Conditions .
#2. Agree to this Sensitive Data Consent Form, but Do Not Enable ("Opt Into") Data Custody	Data Collected, Full Functionality but with Some Inconvenience	You allow us to collect images of your irises, eyes, and face when you sign up at an Orb. The image data is deleted after the Orb creates the IrisCode based on your iris image. We do not retain or transfer the image data to our database. The image data will not be transferred out of the Orb. You may, however, need to revisit an Orb so that your IrisCode can be reverified as we update our algorithms.
#3. Agree to this Sensitive Data Consent Form and Enable ("Opt Into") Data Custody	Data Collected, Full Functionality with more convenience	You allow us to collect images of your irises, eyes, and face when you sign up at an Orb. Further, you allow us to store this information and transfer this data to our teams in the European Union (currently Germany and Poland) and the United States, for the purpose of training our algorithms, as detailed below. You will have full functionality and will not need to revisit an Orb every time we update the algorithms. Plus, you will help us bring Worldcoin to the world faster.

You can withdraw your consent to this Sensitive Data Consent Form at any time by using our request portal found at worldcoin.org/requestportal.

You cannot provide your biometric information at the Orb without reading the full disclosure and signing the consent form. You cannot provide your biometric information at the Orb if you are a resident of the state of Illinois, Texas, or Washington or the cities of Portland, Oregon or Baltimore, Maryland.

Tools for Humanity Corporation, along with its German subsidiary Tools for Humanity GmbH (together, “TFH” or “we,” “us”), is leading the initial development of Worldcoin. Our processing (collection, use, storage, disclosure, and deletion) of your personal data is governed by two documents: the Worldcoin [Privacy Statement](#) and this Sensitive Data Consent Form. The Privacy Statement covers data collected via the Worldcoin website, application, and other services, while this Sensitive Biometric Data Consent Form describes how we process your biometric data collected through our Orb device. Your rights under applicable data privacy law are stated in the Worldcoin Privacy Statement. These documents work together, and both are important for understanding how your privacy is affected by participating in the Worldcoin project. The Privacy Statement and this Sensitive Data Consent Form are incorporated into and governed by the Worldcoin [User Terms and Conditions](#).

Further, we adhere to the principles of the EU General Data Protection Regulation (“GDPR”) for privacy matters. For example, even if your country has data privacy laws that are less protective than the GDPR, we still process your data in accordance with GDPR. We will also only use your data for the purposes stated below in Section 2.2 (and Section 3.4 if you enable Data Custody), even if the data privacy laws in your country would not otherwise limit how we use your data.

This Sensitive Biometric Data Consent Form is comprised of three parts:

1. [Background](#) on the Worldcoin project;
2. [Consent](#) to processing of sensitive data; and
3. [Enabling Data Custody](#).

1. Background.

1.1 The Worldcoin Project

The Worldcoin project aims to accelerate the transition to a more inclusive global economy by fostering the first truly global, widely adopted decentralized web (“web3”) protocol. “Worldcoin” is the name currently used for both the underlying blockchain protocol where transactions take place and the specific digital token (abbreviated to “**WLD**”). To make Worldcoin accessible and equitable, we will allow everyone to claim a share of WLD for free. For the project to succeed, though, we must address the problem of online duplicate and fake accounts (like bots), while protecting your privacy and the security of your data. As a result, we have set out to use iris images to establish unique human identities and, more broadly, to create an application that can confirm a human presence based on iris images. You can read more about the Worldcoin project at our website (worldcoin.org).

1.2 The Orb

To implement secure verification, we have developed a proprietary device called **the Orb**. It confirms you are a “unique human” without requiring you to provide any identity documentation or other information about who you are. The Orb captures a series of high-resolution images of your eyes (specifically, your irises) and face (both your head and shoulders). Some of the images are used to confirm you are a real, living human being. The others—namely, those of your irises—are converted into an **IrisCode**, a string of numbers that is used to determine whether you have previously signed up at an Orb.

2. Consent to the Processing of Sensitive Biometric Data.

2.1 Data We Collect.

With your consent, we collect the following biometric and personal data using the Orb:

- **Images of your irises and your eyes.** These images are collected in the visible and near-infrared spectrums. They are used to

generate the IrisCode and to train our algorithm to recognize and differentiate among human irises. As described in Section 2.3, below, the algorithm is not perfect and may make mistakes, such as erroneously determining that you have already signed up at an Orb and claimed your free share of WLD.

- **Images of your face.** These images are collected in the visible, near-infrared, and far-infrared spectrums. We also collect a depth image. The images are used to confirm you are a human being, and therefore help prevent and detect fraud, and train the algorithm.

Important! We are collecting these images to determine that you are a unique human. However, we do not use the data to know who you are. This kind of data may be considered protected biometric data where you live and may be subject to additional protections and restrictions.

2.2 What We Do with This Data.

With your consent, we use the above data for the following purposes **only** (unless you enable Data Custody, described below):

- Calculating IrisCodes;
- Comparing IrisCodes;
- Optimizing IrisCode calculations; and
- Detecting whether a user is a human being and whether a signup is valid (security and fraud prevention).

2.3 Accuracy.

The algorithm software uses probabilities to determine whether you have signed up at an Orb before. It is not perfect. As a result, it may mistakenly conclude that you have already signed up at an Orb (and claimed free WLD) before. At this time, we do not have a way for users to report suspected errors or to contest the algorithm's determinations. By agreeing to this Sensitive Data Consent Form, you provide your consent to this automated decision making.

2.4 Consent to this Sensitive Data Consent Form is Not Required to Participate in Worldcoin.

You do not have to agree to this Sensitive Data Consent Form in order to take part in Worldcoin. You can still create an account and establish a Worldcoin wallet without providing this consent, though you will still need to agree to the Worldcoin [User Terms and Conditions](#) and [Privacy Statement](#). Further, if you choose not to agree to this Sensitive Biometric Data Consent Form, then you will not be able to participate in certain aspects of Worldcoin, such as receiving a small amount of WLD for free or establishing a unique, portable digital identity.

2.5 Withdrawing your Consent

You can withdraw your consent at any time by contacting us at:

The Worldcoin Request Portal at worldcoin.org/requestportal, or

548 Market Street, PMB 49951, San Francisco, CA 94104 USA

You can also delete your data from within the Worldcoin App under the Settings menu. If you withdraw your consent, then we will no longer use your data for the purposes stated above. You may also choose to delete your data from within the Worldcoin application.

3. Enabling Data Custody.

3.1 Current Status of the Worldcoin Project: The Field Test.

We are still working to improve the operation of the Orb and to advance the hardware and software systems that determine if someone is eligible to receive a free share of WLD. We call this stage of our development the **Field Test**.

To improve the accuracy of the system's eligibility determinations, we need to continue training our algorithm software. "Training" means using images from real people like you to help the software "learn" to distinguish humans from non-humans and differentiate one person from everyone else. As the software is trained and gets better, we will update it from time to time. When that happens, we may need to re-verify your unique digital identity, which would require using your iris image again.

3.2 Data Custody.

If you consent to this Sensitive Biometric Data Consent Form, in the Worldcoin app you will be asked to **"Enable Data Custody."** If you choose to opt into Data Custody, you will allow us to:

1. Hold onto sensitive data collected by the Orb during the Field Test;
2. Send the images to our teams in the European Union and the United States; and
3. Use the images to continue developing and improving the software, as described below.

This will likely help you avoid some inconvenience because, if we have your image data, then you will not need to return to an Orb to re-verify your digital identity when we update the software. It will also help us because we can then use your data to make the system better and bring Worldcoin to the world faster. Again, you are not required to Enable Data Custody, but doing so may help you and us, and so is greatly appreciated.

3.3 Data We Collect When You Enable Data Custody.

With your consent to the Sensitive Data Consent Form, we collect images of your irises and images of your face, as described in Section II.1 above. The sensitive data we collect does not change if you agree to Data Custody.

3.4 What We do with this Data When You Enable Data Custody.

When you agree to the Sensitive Data Consent Form, we use the above data for the purposes described in Section 2.2. When you also enable Data Custody, we use the data for the following additional purposes:

- Automatically upgrade your IrisCode in the event we update our algorithm software;
- Developing and training algorithms to recognize and differentiate among human irises;
- Removing bias from our iris recognition algorithms;
- Developing and training a system to detect whether a user is a human being or whether a signup is valid;
- Developing and training models that use artificial iris images for further training of algorithms; and
- Training and evaluating personnel who work on these systems.

3.5 Transfer of Data, including Possible Risks.

When you enable Data Custody, and therefore allow us to use your data for the purposes described above in Section 3.4, we generally send the data to our Research and Development ("**R&D**") teams, and this may result in your data being transferred outside of the country where it was collected. These teams are currently located in the European Union (currently Germany and Poland) and the United States. Our [Privacy Statement](#) explains how we protect and comply with cross-border data transfer laws. Section 6 of the Privacy Statement laid out the risks related to such cross-border data transfer.

While we ultimately plan to publish the IrisCodes on the blockchain, we will not sell, lease, trade, or otherwise profit from your biometric data. Other limited situations in which we may share your biometric data or other personal data are disclosed in our Privacy Statement.

3.6 Retention of Data.

We will retain the images collected by the Orb, including your biometric data, until the development and improvement of the algorithm has concluded or as required by law or regulation.

