Privacy Notice [Staging]

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

At Worldcoin ("Worldcoin," "us," or "we"), we recognize that your privacy is important. This Privacy Statement applies to all information we collect from you (your "Data") through your use of and access to our websites and applications we control, your Worldcoin user account (your "Account"), the Worldcoin protocol (the "Protocol") and all of the associated functionality, content, applications, and services we provide to you (collectively, the "Services"). We explain our collection of biometric data collected through the Orb in Section 3 below, and we seek your consent through the Data Consent Form if you choose to let us collect your biometric data.

We are committed to protecting your Data and your right to privacy, and we expressly designed the Services with your privacy in mind. By accessing and using the Services, you signify acceptance of the terms of this Privacy Statement. Where we require your consent to process your Data, we will ask for your consent to the collection, use, and disclosure of your Data as described further below. If you do not agree to the terms of our Privacy Statement, you may not access or use our Services. All capitalized terms not defined in this Privacy Statement have the meaning set forth in the Worldcoin User Agreement.

If you have any questions or concerns about how we use your Data, you may submit your request through our Request Portal or at privacy@worldcoin.org.

1. **Data We Collect**

Data You Provide To Us

To establish an Account or gain access to our Services, we will ask you to provide us with some information about you. Please note that we may not be able to serve you as effectively or offer you our Services if you choose not to share certain information with us. We may collect the following types of Data from you:

- First and last name

- Email address

- Phone number

- Location data

- Feedback and correspondence from you, such as any emails, chat messages, or other communications you send to us via email or third-party social media websites

We may also use the information above to provide transaction features within our Services, including finding other users and facilitating transactions with other users, including through imported contacts.

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. You are responsible for ensuring your collection and sharing with us of your contacts' information is compliant with applicable laws. This may require you to 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.

WITH YOUR EXPLICIT WRITTEN CONSENT, WE MAY ALSO COLLECT IMAGES OF YOUR IRIS AND YOUR FACE. SOME JURISDICTIONS CONSIDER THESE IMAGES AS A TYPE OF BIOMETRIC DATA SUBJECT TO SPECIAL PROTECTION UNDER THE LAW. WE COLLECT THE BIOMETRIC DATA FOR THE PURPOSE OF UNIQUELY IDENTIFYING A NATURAL PERSON. IN ORDER FOR WORLDCOIN TO USE YOUR

BIOMETRIC DATA, YOU WILL NEED TO FIRST SIGN A CONSENT FORM AUTHORIZING WORLDCOIN TO USE THIS DATA.

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.** If required by Law (such as any know-your-customer requirements), we may obtain information from third-party services using your Data to verify your identity.

Data We Collect About You Automatically

To the extent permitted under applicable Law, we may collect certain types of Data automatically, such as whenever you interact with or use 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 help you secure your Account credentials. Information collected automatically includes:

- **Online Identifiers:** Geo-location and tracking details, computer or mobile phone operating system, web browser name and version, and personal 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, 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).

Anonymized and Aggregated Data

Anonymization is a data processing technique that modifies personal data so that it cannot be associated with a specific individual. Except as described in this section, none of the other provisions of this Privacy Statement applies to anonymized or aggregated customer data (i.e., information about individuals that we combine together so that it no longer identifies or references an individual).

We may use anonymized or aggregate data for any business purpose, including to better understand user needs and behaviors, improve our Services, conduct business intelligence and marketing, detect security threats, and train our algorithms and models. We or our third-party advertising partners may also collect certain anonymous or aggregate information. For example, we may use your IP address to diagnose problems with our servers or software, and gather demographic information. Our third-party advertising partners may also provide us with aggregate, but not individual, reports that will tell us how many ads were presented and clicked upon on our Services.

Types of data we may anonymize include, transaction data, click-stream data, performance metrics, fraud indicators, and hashed iris scans.

2. **How We Use Your Data**

We will use certain forms of Data to enhance the operation of our websites, improve our internal marketing and promotional efforts, statistically analyze Website use, improve the Services for research and development purposes, and train our algorithms and models. We use the blockchain network address associated with your account to send you Worldcoins ("WLD") or other Supported Currencies. We use your Data to deliver information to you and to send you Notices. We use your IP address to block individuals from prohibited states or countries from accessing the Services and to comply with applicable Law. Finally, we may use your Data to resolve disputes, troubleshoot technical problems and enforce our agreements with you, including the Worldcoin User Agreement and this Privacy Statement.

3. **Special Categories of Data**

When you are ready to claim your share of WLD, you will be asked to provide biometric data in the form of taking images of your irises and your face using the Orb. The Orb software will capture these images and will create a hashed unique identifier based on your iris image ("IrisHash"). Our primary purpose in collecting your biometric data is to distribute WLD equitably by ensuring that every living individual in the world will only have one opportunity to claim WLD. In order to prevent individuals from claiming their WLD multiple times, we need to be able to determine whether you have previously claimed WLD from the Worldcoin Protocol without jeopardizing your privacy or invading the privacy of others. With your written consent, we collect images of your irises, make an IrisHash based on the iris image, and compare the IrisHash to the other IrisHashes in the Worldcoin database to determine whether you have already claimed your WLD, and upon determination that the IrisHash does not exist in the database, store the IrisHash in the database. Before our algorithms are fully trained and with your consent, we also transmit the biometric data to our server for research and development purposes and for fraud prevention purposes.

When you provide us with biometric data, you agree that you have voluntarily provided such Data, and you consent for us to use that information for the purposes for which it was collected.

4. **How We Share Your Data**

We only disclose Data to our team members who require access to the Data in order to perform their tasks and duties and our service providers whose services we rely on in order to process the Data and provide our Services to you. We ensure that anyone who accesses the Data has a legitimate purpose for accessing it.

We do not sell, license, lease or otherwise disclose your Data to any third party for any reason other than the purposes described below:

- We may share your Data with Identity Verification Vendors, if required by Law (i.e. know-your-customer-requirements).

- We take privacy seriously, but we may be compelled by a subpoena, court order, or similar procedure to share your information with law enforcement, and officials, or other third parties. We may also disclose your Data in order to comply with applicable law and to respond to mandatory legal or governmental requests or demands for information.

- We may disclose your information when we believe in good faith that the disclosure of Data is necessary to prevent physical harm or financial loss to us or to others, to report suspected illegal activity, or to investigate violation and to enforce our Worldcoin User Agreement or any other applicable Worldcoin policies.

Transaction information related to your use of your Account and the Services may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis, which can lead to de-anonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other Data. It may therefore be possible for others to identify Data from (and including) wallet addresses (including your Worldcoin wallet address) and other data available on the blockchain that supports the Worldcoin Protocol, without the involvement of Worldcoin, as the blockchain is by nature a transparent and public ledger.

5. **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, or "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 computer 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, fraud prevention and for other site operations.

These tools allow us to:

• Perform website analytics

• Prevent fraud and prevent attacks against our websites and Services

• 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 which 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 to know which pages are the most and least popular and see how visitors move around the Services. All information these cookies collect is aggregated and 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 its 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 the 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 some 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 these. Such advertising will only be delivered where permitted by applicable law. If you do not allow these cookies, you will experience less advertising tailored to your inferred interests on our Sites and will not receive targeted WorldCoin advertisements on third-party websites.

Worldcoin also uses Google Analytics. The following link explains how Google uses 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.

6. **Security**

Worldcoin strives to ensure that our systems are secure and that they meet industry standards. We have implemented physical and electronic safeguards that protect your Data both in transit and at rest. We ensure that any service provider with access to the Data has adequate security controls consistent with our standard and applicable law.

Despite our efforts to protect the security of your information, no security system is completely effective and we cannot guarantee that

our systems will be secure from unauthorized access.

7. Retention of Data

We will retain your Data as long as you continue to use the Services, or for as long as is necessary to fulfill the purposes outlined in this Privacy Statement. Even after you or we delete your Account, we can retain copies of your Data for a period of time that is consistent with applicable Law, applicable statutes of limitation or as we believe is reasonably necessary to comply with applicable Law, legal processes or governmental request, to collect fees owed, to resolve Disputes, to address problems with our Services, to assist with investigations, to enforce the Worldcoin User Agreement or other applicable agreements or policies, or to take any other actions consistent with applicable Law.

WE WILL PERMANENTLY DELETE YOUR BIOMETRIC DATA IMMEDIATELY AFTER WE CONCLUDE THE PURPOSE FOR WHICH IT WAS COLLECTED. WE WILL RETAIN HASHED BIOMETRIC DATA FOR AS LONG AS IS NECESSARY TO FULFILL THE PURPOSES OUTLINED IN THIS PRIVACY STATEMENT.

Please note that blockchains are decentralized or 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 such Data to or from such networks.

8. Legal Basis for Processing Data

Our legal basis for collecting and using the Data described above will depend on the Data concerned and the specific context in which we collect it.

- **Data:** We will normally collect Data from you only (i) where we need the Data to perform a contract with you; (ii) where the processing is in our legitimate interests and not overridden by your rights; or (iii) where we have your consent to do so. We have a legitimate interest in operating our Services, and communicating with you as necessary to provide access to the Services, for example when responding to your queries, improving our Services, undertaking marketing, or for the purposes of detecting or preventing illegal activities.

- **Special Categories of Data:** Our legal basis for processing your biometric data for the purposes described in section 3 above is based in part on your explicit written consent. We have other legal bases for processing your biometric data such as the public interest of ensuring our tokens are distributed in an equitable and fair manner to everyone.

In some cases, we may also have a legal obligation to collect Data from you or we may otherwise need the Data to protect your vital interests or those of another person.If we ask you to provide Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Data is mandatory or not (as well as of the possible consequences if you do not provide your Data).

9. Individuals Under 16

Individuals under the age of 16 are not allowed to use the Services, and we do not knowingly collect Data from Children in violation of the Children's Online Privacy Protection Act. If you believe that your child under 13 has gained access to the Services without your permission, you may request the deletion of their Data by contacting us at privacy@worldcoin.org.

If we learn that we have collected Data about a child under age 13, we will delete that 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.

10. International Data Transfers

To facilitate our global operations, Worldcoin may transfer, store, and process your Data within our family of companies, partners, and service providers based throughout the world. We contractually obligate recipients of your Data to agree to at least the same level of privacy safeguards as required under applicable data protection laws. By communicating electronically with Worldcoin, you acknowledge and agree to your Data being processed in this way.

We may transfer Data to countries other than the country in which the Data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the Data. When we transfer your Data to other countries, we take measures to comply with applicable data protection laws related to such transfer. To the extent that we transfer your Data outside of the EEA and United Kingdom, we will ensure that the transfer is lawful and that Data Processors in third countries are obliged to comply with the GDPR and the UK Data Protection Act 2018. If transfers of Data are processed in the U.S., we may in some cases rely on applicable standard contractual clauses.

11. **Changes to This Policy**

Worldcoin reserves the right to make changes to this Privacy Statement. You should review our Privacy Statement frequently. If we make material changes to our Privacy Statement, our revised Privacy Statement will be posted at getworldcoin.com/privacy, and it will either be noted in your Account or on our Website that material changes have been made, or we will notify you by email. The date of the most recent update to our Privacy Statement will be set forth in the header to the Privacy Statement.

12. **How to Contact Us About This Policy**

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 at privacy@worldcoin.org. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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