

Worldcoin Privacy Statement

Last updated: 25 August 2022

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, protocol, and other services linked to this Privacy Statement (collectively, the “Services”). This Privacy Statement is incorporated into and governed by the Worldcoin User Terms and Conditions (worldcoin.org/tos). “Worldcoin” means Tools for Humanity Corporation and its wholly owned subsidiary Tools for Humanity GmbH.

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 at the Orb unless you agree and consent to the [Data Consent Form](#).

The California Consumer Privacy Act, as amended by the California Privacy Rights Act, does not presently apply to Worldcoin.

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
- The statutory rights you have under GDPR

3. Our Commitment to Protecting your Privacy and Data

Worldcoin is responsible for the processing of your personal data. You can contact Worldcoin through our Request Portal at worldcoin.org/requestportal or at 548 Market Street, PMB 49951, San Francisco, CA 94104 USA.

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

Privacy

We have designed our products and services with your privacy in mind. We collect data 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 at worldcoin.org/requestportal or write to us at Tools For Humanity Corporation, 548 Market Street, PMB 49951, San Francisco, CA 94104 USA.

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. The legal grounds for processing in the cases below are the user's consent and the performance of a contract, namely providing the Services. Below is a list of data that you may 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 the Worldcoin App 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. The address book information remains on your device.

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. 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 the Worldcoin App 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' phone numbers to those numbers and corresponding wallet addresses provided by other users on our servers.

- **Location information.** You may decide to enable a location-based service (such as a feature allowing you to find an Orb Operator near you). We may collect information about your location through GPS, IP address, cell tower information, or 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.
- **Enterprise Data.** 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.

4.4 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.
- **Cookies:** small data files stored on your hard drive or in-device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits.

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).

The legal basis for processing the above mentioned data is the legitimate interest of a functioning app or website.

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.

The legal basis for processing the above-mentioned data is the legitimate interest of a functioning app or website, business insights and fraud prevention.

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.

The legal basis for processing the above mentioned data is the user's explicit consent.

5. How We Use the Data We Collect

We must have a valid reason (or "lawful basis for processing") to use your personal information. 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 express permission. When it comes to your biometric data, we ask for your explicit and informed consent.

We use your information for the following purposes:

- To provide, maintain, improve, and develop our products and services, including to debug and repair errors in our Services;
- To conduct research to develop and improve our product;
- To train our algorithm to better recognize unique users;
- To analyze your use of our Services to provide better support;
- To use your wallet address to send you Worldcoin tokens (WLD) or other cryptocurrencies that we support;
- To comply with applicable laws (such as using your IP address to block individuals whose country does not allow them to access the Services);
- To handle your requests, complaints and inquiries;
- To resolve disputes, troubleshooting issues, and enforcing our agreements with you, including this Privacy Statement and the Worldcoin User Agreement; and
- To contact you regarding updates to the Services.

6. Where We Process Your Data

6.1 Data Transfer.

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), we ensure that they are in compliance with GDPR. We only share data with data processors outside of the EEA 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. When transferring data to a country that does not have an adequacy decision, we utilize the EU Standard Contractual Clauses.

6.2 Risks of Transfer

Below is a list of possible risks that may arise if we transfer your data to the United States, the European Union, or another country:

- While we do what we can to ensure that our subcontractors are contractually obligated to adequately protect

your data, these subcontractors may not be subject to the data privacy law of your country. If the subcontractors were to illegally process your data without authorization, then it may be difficult to assert your privacy rights against that subcontractor.

It's possible that the data privacy law in your country is inconsistent with the data privacy laws in the U.S. or in the E.U.

Please note that this list contains examples, but may not include all possible risks to you.

6.3 NO FINDING OF ADEQUACY OF UNITED STATES PRIVACY LAWS

The European Union Commission, responsible for making determinations of the adequacy of the Privacy Laws of other jurisdictions in comparison to the GDPR has not yet positively established that the country-specific level of personal data protection in the United States, where part of your data is processed, provides the same level of protection as the Privacy Laws in the European Union.

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 reasonably secure way;
- Take steps to ensure 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 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, where appropriate, we may challenge invalid, overbroad, or unlawful requests. We may share personal data with police and other government authorities where we reasonably believe it to be necessary to comply with law, regulation or other legal process or obligation.
- We may share your personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Worldcoin, our users, the public, or others.
- We may share your personal information with our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We may share your personal information in connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

- Data, including your personal information, may be shared between and among Worldcoin and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.
- We may share your personal information with your consent or at your direction.
- We also may share aggregated, anonymous, or de-identified information that cannot reasonably be used to identify you.

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: Blockchains are public ledgers of transactions that are maintained on decentralized networks operated by third parties that are not controlled or operated by Worldcoin. Due to the public and immutable nature of blockchain ledgers, we cannot guarantee the ability to amend, erase, or control the disclosure of data that is uploaded and stored on a blockchain, including your IrisCode

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. Our [Cookie Policy](#), is incorporated herein by reference.

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 delete your account data within 90 days; otherwise we will delete your account data after 2 years of inactivity. If required by law, we will continue to retain your personal 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. If you would like us to delete your personal data, including your biometric information, then please refer to Section 13 below.

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 18. If you believe that your child under the age of 18 has gained access to the Services without your permission, you may request the deletion of their data by contacting us through our Request Portal at worldcoin.org/requestportal.

If we learn that we have collected data about a child under age 18, 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 18 years old. We do not market products or services for purchase by children.

12. The statutory rights under GDPR

This section applies if you are a resident of the European Economic Area. You may have additional rights under GDPR as listed below. To exercise your rights available under GDPR, please contact us at worldcoin.org/requestportal.

- You have the right to obtain from us at any time upon request information about the personal data we process concerning you within the scope of Art. 15 GDPR.
- You have the right to demand that we immediately correct the personal data concerning you if it is incorrect.
- You have the right, under the conditions described in Art. 17 GDPR, to demand that we delete the personal data concerning you. These prerequisites provide in particular for a right to erasure if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, as well as in cases of unlawful processing, the existence of an objection or the existence of an obligation to erase under Union law or the law of the Member State to which we are subject.
- You have the right to demand that we restrict processing in accordance with Art. 18 GDPR.
- You have the right to receive from us the personal data concerning you that you have provided to us in a structured, commonly used, machine-readable format in accordance with Art. 20 GDPR.
- You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out, inter alia, on the basis of Article 6 (1) sentence 1 lit. f GDPR, in accordance with Article 21 GDPR.
- You have the right to contact the competent supervisory authority in the event of complaints about the data processing carried out by the controller. The responsible supervisory authority is: the Bavarian State Office for Data Protection Supervision
- If the processing of personal data is based on your consent, you are entitled under Art. 7 GDPR to revoke your consent to the use of your personal data at any time with effect for the future, whereby the revocation is just as easy to declare as the consent itself. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected.

13. **How to Contact us About this Privacy Statement**

You may choose to delete your data from within the Worldcoin app under the Settings menu. If you have questions or concerns regarding this Privacy Statement, wish to exercise your rights, or to contact our Data Protection Officer (DPO), please submit your request through our Request Portal at worldcoin.org/requestportal 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](#).

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