Test Data Collection Consent Form

> **THIS ONLY PERTAINS TO TESTING AND TRAINING WHICH IS DECOUPLED FROM REGULAR (ORB) OPERATIONS.**

> **I agree to the following data collection:**
>
> **Tools for Humanity Corp and Tools for Humanity GmbH** will collect my **biometrically usable face and iris images plus machine readable derivatives of these images** for the **purpose of training machine learning models** with that data. You can freely revoke your consent at any time (e.g. by clicking a button in the app).
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> **The details of the data collection will be explained in great detail below.**

1. Background.

1.1 The Purpose.

We develop new technologies in the context of Proof of Personhood (the proof that someone is a unique human being without disclosing which one) and decentralized digital identity (I can prove who I am i.e. by name). For this context we ask you for your data to test our products and to train our neural networks. We call this Test Data Collection.

For this purpose we have developed a web application for computers and phones alike that allows you to manage your data (Data Management App). Our Data Management App implements state-of-the-art encryption techniques and follows strict privacy protocols to safeguard your personal information. Your data will be stored in a secure server environment with restricted access, ensuring that only authorized personnel can handle it.

1.2. The Controllers

The joint data controllers are:

- Tools for Humanity Corporation, 548 Market Street, PMB 49951, San Francisco, CA 94104 USA, and

- Tools for Humanity GmbH, Allee am Röthelheimpark 41, 91052 Erlangen, Germany

The details of the joint controllership arrangement are as follows: Tools for Humanity Corporation is primarily responsible for developing, operating, and supporting the Services, including responding to data subject requests and complying with any statutory obligations. Tools for Humanity Corporation maintains the contracts the most service providers, particularly in the context of cloud hosting services i.e. Tools for Humanity Corporation is responsible for the storage and security of the data in the context of this test data collection.

Tools for Humanity GmbH is primarily responsible for developing and training the algorithms, building and managing the data flows from the Orb to our servers. This test data collection is operationally overseen by Tools for Humanity GmbH.

To you, as the test user, both entities act as a single entity. Users can contact either entity for any processing activity. In the relation to

the user both entities declare themselves equally responsible for any activity.

2. Data Processing.

2.1 Data We Collect

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

- **Images of your irises and your eyes.** These images are collected in the visible and near-infrared spectrum.

- **Images of your face.** These images are also collected in the visible, near-infrared, and far-infrared spectrum. They can also be combined to greate a video. We also collect (3D) depth images. Together these facial images and the iris images are referred to as "**Image Data**".

- **Derivatives of the above data.** We use complex state of the art algorithms and our own neural networks to create numerical representations ("**Derivatives**") of the above images to enable machine comparisons and interactions between them. These derivatives are strings of numbers (*e.g.*, "10111011100…") that entail the most important features of the images. It is not possible to fully reverse the Derivatives to the original image. Most importantly, we use our custom version of the Daugman Algorithm to calculate such a string of numbers from the iris image ("**Iris Code**").

- Data from the Data Management App:

    - **Administrative information.** To contact you about the project and to log in to our Data Management App we are collecting the following information: email, First name, Last name, First letter of first name of both parents (to add randomness), year and month of birth, which ethnicity and gender you identify with (optional) to help optimize algorithmic fairness and to which version of the consent form you have consented to at which time (timestamp).

    - **App metadata.** In order to provide our Data Management App where you can administer and delete your data we are collecting Metadata from you that include your screen resolution, operating system, device used, hashed IP address, timestamp.

Important! We are collecting Image Data to train our Algorithm. **We do not use the data to know *who* you are (identification).**

The data we collect (described above) may or may not be considered biometric data depending on the applicable laws where you live. However, we treat them as biometric data and handle them with extra security and care. The legal basis to collect the Image Data is your explicit consent. The legal basis to calculate derivatives of the Image Data (like the Iris Code) and actively compare it against our database is your explicit consent.

2.2 What We Do with This Data.

We use Data from the Data Management App only for the purpose of providing the Data Management App and to administer our data collection e.g. by contacting you if you have questions about the project, to explain to you what we are doing with your data or to contact you in connection with our project. The legal basis for this is legitimate interest. The legitimate interest pursued is providing an infrastructure for data donations and data collection where users can easily administer their data and withdraw their consent.

With your consent, we use the above data for the following purposes:

1. Store the Image Data;

2. Send the Image Data to our team in the European Union;

3. Use the Image Data to continue developing and improving the software. In detail this means:

a. Optimizing and improving the IrisCode and Derivatives calculation;

b. Labeling the collected data;

c. Developing and training algorithms to recognize, segment and differentiate among images of human irises and faces;

d. Test the algorithms against the human labeled results;

e. Developing, training, and testing a system to detect whether a user is a human presenting a real human eye and whether a signup is valid

f. Developing, training, and testing models that use artificial iris images for further training of algorithms;

g. Developing, training, and testing models that improve the Orb performance and user experience;

h. Developing training, and testing models that are able to differentiate between adults and minors to prevent underage users; and

i. Training and evaluating personnel who work on these systems.

4. Label your Image Data with the perceived and approximated gender, age range, and skin color to train on algorithmic fairness in light of the diversity in the world. In detail this means:

a. Detecting and removing bias from our algorithms; and

b. Training on algorithmic fairness by labeling the approximated gender, age range, and skin color.

5. Perform a test sign-up with the data. In detail this means:

a. Calculating Iris Codes;

b. Comparing your Iris Code against other Iris Codes; and

c. Security and fraud prevention. This includes:

- Detecting whether a user is a living human being which includes checking whether the detected faces temperature matches the range of normal human body temperatures;

- Detecting whether a signup shows an unaltered, unobstructed, natural human iris which includes checking whether the face changes during the sign-up; and

- Detecting whether the person has already appeared in front of the Orb which includes processing locally stored Derivatives of face images.

We will never sell your data. We will also not use any data listed in this form to track you or to advertise third parties' products to you.

2.3 Whom We Share the Data With

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

- Share it in a 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.

If you enable data custody we do share your data in these limited ways:

- **With Worldcoin**: We may disclose data with the Worldcoin Foundation or a subsequent non-profit organization responsible for

promoting and furthering the mission of the Worldcoin project.

- **Within TFH:** We only disclose data to our 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 and have a system of strict access control.

- **With vendors and service providers outside of TFH:** 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 categories of such service providers are:

  - Cloud service providers (all data types)

  - SaaS providers; we use SaaS products in the following categories:

    - Database and infrastructure management

    - Data security

    - Data subject request management

    - Technical support

- External experts

  - Specialist software developers

  - Legal specialists

- Labeling service providers

We do not share the images or derivatives of the images with anyone not working on the Worldcoin project.

2.4 Retention of Data.

We will retain the Image Data until the development and improvement of the algorithm has concluded or as required by law or regulation. In any case, we will delete the Image Data upon your request. Additionally, we commit ourselves to delete all Image Data after a maximum of ten years after collection albeit the development of the algorithm and the concomitant deletion of all Image Data will very likely be concluded earlier.

2.5 International Data Transfer

We will transfer your data to the European Union. Our legal basis for this are existing mutual adequacy decisions finding the level of data protection in the EU to be equal to the level in the UK.

2.6 Withdrawing your Consent

You can withdraw your consent at any time by contacting us at: dpo@toolsforhumanity.com or by a letter addressed to one of our physical addresses with the subject "DPO request".

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

3. Statutory rights

To exercise your rights please contact us at worldcoin.org/requestportal. Apart from exceptional cases, we will resolve your request within the statutory deadline of one month. The following list explains the most important statutory rights you have regarding your personal data.

- 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 (Bayerisches Landesamt für Datenschutz).

- 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.

DCCF20240923