

1. Who We Are

We are Tools For Humanity Corporation (650 7th St, San Francisco, CA 94103, USA) (“TFH”) a technology company building for humans in the age of AI.

2. Overview

To ensure the security and integrity of our services and the World Network (www.world.org) as a whole, we collect and process location data relating to Orb hardware devices distributed and/or operated in our network. This notice explains what data is processed, for what purposes, and your rights in relation to this processing.

3. What Data We Process

We process the following categories of data in connection with Orb location tracking:

- The geographic location of the Orb (e.g., GPS coordinates or network-based location data);
- Device identifiers associated with the Orb;
- Timestamps associated with location signals.

This processing concerns the location of the hardware device itself and does not involve tracking the real-time location of users.

4. Purpose of Processing

We process Orb location data for the following purposes:

- Ensuring device security and preventing theft, misuse, or unauthorized relocation;
- Monitoring operational integrity;
- Facilitating maintenance, troubleshooting, and technical support;
- Ensuring compliance with contractual or regulatory requirements;
- Detecting and preventing fraud or abuse.

5. Legal Bases

Where applicable under data protection law, the processing of Orb location data is based on:

- Our legitimate interests in securing our infrastructure, preventing fraud, and maintaining service reliability (Article 6(1)(f) GDPR); or
- Compliance with legal or regulatory obligations (Article 6(1)(c) GDPR), where relevant.

We have conducted a balancing assessment where processing is based on legitimate interests.

6. Data Retention

Location data is retained only for as long as necessary to fulfill the purposes described above, including security monitoring, compliance, and dispute resolution, and is then securely deleted or anonymized in accordance with our data retention policies.

7. Data Sharing

Orb location data may be shared with:

- Authorized service providers supporting infrastructure monitoring, security, and maintenance;
- Affiliates within our corporate group, where necessary;
- Competent authorities, where required by law.

All service providers are subject to appropriate contractual and security safeguards.

8. Security Measures

We implement appropriate technical and organizational measures to protect location data against unauthorized access, loss, alteration, or disclosure. Access is restricted to personnel

9. Your Rights

Where location data constitutes personal data under applicable law, you may have the right to:

- Request access to your personal data;
- Request rectification or erasure;
- Request restriction of processing;
- Object to processing based on legitimate interests; and
- Lodge a complaint with a competent supervisory authority.

To exercise your rights, please contact us at dpo@toolsforhumanity.com.