

Privacy Policy

Effective as of 6/8/23.

Please click [here](#) to view the previous version of our Privacy Policy.

This “Privacy Policy” describes the privacy practices of Commonwealth Labs, Inc. (“**Commonwealth**”, “**we**”, “**us**”, or “**our**”) in connection with the www.commonwealth.im website, the Commonwealth Platform (i.e., the Commonwealth decentralized governance platform), and any other website or mobile application that we own or control and which posts or links to this Privacy Policy (collectively, the “**Service**”), and the rights and choices available to individuals with respect to their information.

Commonwealth may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information. These supplemental privacy policies will govern how we may process the information in the context of the specific product or service.

You can download a printable copy of this Privacy Policy [here](#).

We provide important information for individuals located in the European Union, [European Economic Area](#), and United Kingdom (collectively, “Europe” or “European”), described [below](#).

Personal Information We Collect

Information you provide to us. Personal information you provide to us through the Service or otherwise includes:

- **Contact information**, such as your first and last name, email.
- **Digital Wallet information**, such as wallet addresses across linked blockchains, publicly available ENS or other name service registrations, token balances and user interactions from linked wallets. “Digital Wallet” means an application or software that a Governance Interface User or potential Governance Interface User uses to secure their private keys and send blockchain transactions. “Governance Interface User” means a person that Commonwealth has approved to discuss, vote, or delegate tokens for any network without intermediation on the Commonwealth Platform.
- **Content you choose to upload to the Service**, such as information you may share with us when you make a purchase, communicate with us via third-party social media sites, or any other information you choose to provide to us.
- **Professional or employment information**, such as your current job title and Company name used to apply for a job with us or otherwise.
- **Profile information**, such as your username and password, interests, preferences, photograph, links to profiles on social networks, and any other information you add to your account profile.
- **Registration information**, such as information that may be related to a service, an account or an event you register for (e.g. for your participation in promotional, incentive, or other platform programs).
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, request customer support or otherwise correspond with us online.

- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Usage information and user-generated content**, such as information about how you use the Service and interact with us, including information associated with any content you upload to the websites or otherwise submit to us, and information you provide when you use any interactive features of the Service. This can include, but is not limited to, comments, questions, messages, voting responses, polling responses, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data
- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version you use to access our Services, including manufacturer and hardware model, resolution, mobile device carrier, operating, unique device identifiers, radio/network information (e.g., Wi-Fi, LTE, 3G).
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our marketing emails or clicked links within them.

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our [Cookie Policy](#).

Information we obtain from other third parties. We may receive personal information about you from other sources, including third parties, and combine that with information we collect through our Services. For example, a business partner may share your contact information with us if you have expressed interest in learning specifically about our products or services, or the types of products or services we offer. We may obtain your personal information from other third parties, such as marketing partners, publicly-available sources and data providers.

If you choose to login to the Service via a third-party platform, including but not limited to GitHub or WalletConnect, or otherwise connect your account on the third-party platform or network to your account through the Service, we may collect information from that platform or network. For example, this information may include your GitHub username and profile picture. You may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of your friends or connections and your email address.

Data about others. Users of the Service may have the opportunity to refer friends or other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Service. We use your personal information to:

- provide, operate and improve the Service and our business
- provide information about our products and services
- establish and maintain your user profile on the Service
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- communicate with you about offers, and events offered by Commonwealth and others, and understand your needs and interests, and personalize your experience with the Service and our communications
- provide support and maintenance for the Service
- respond to your requests, questions and feedback
- detect, investigate and prevent fraudulent activity and other illegal activities and protect the rights and property of Commonwealth and others
- facilitate contests, sweepstakes and promotions and process and deliver entries and rewards
- enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- facilitate your invitations to friends who you want to invite to join the Service

For research and development. We analyze use of the Service to analyze and improve the Service and to develop new products and services, including by studying user demographics and use of the Service.

To send you marketing and promotional communications. We may send you marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the [Opt out of marketing](#) section below.

To display advertisements. We may work with advertising partners to display advertisements on the Service or elsewhere online. These advertisements are delivered by our advertising partners and may be targeted based on your use of the Service or your activity elsewhere online. To learn more about your choices in connection with advertisements, please see the section below titled “Targeted online advertising.”

To comply with law. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

For compliance and fraud prevention. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

How We Share your Personal Information

We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

Affiliates. We may share your personal information with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. We may share your personal information with vendors, consultants and other third party companies and individuals that provide services on our behalf or help us operate the Service (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy and are prohibited from using or disclosing your information for any other purpose.

Professional advisors. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes [described above](#).

Business transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

Other users and the public. Your profile and other user-generated content (except for messages) may be visible to other users of the Service and the public. For example, other users of the Service or the public may have access to your information if you chose to make your profile or other personal information available to them through the Service, such as when you provide comments, reviews, or share other content. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of information.

Your Choices

In this section, we describe the rights and choices available to all users. Users who are located within the European Union can find additional information about their rights [below](#).

Access or Update Your Information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

Opt out of marketing communications. You may opt out of marketing-related emails by following the instructions in those emails, or by contacting us at hello@commonwealth.im. If you opt out, you may continue to receive service-related and other non-marketing emails, such as those about your account or our ongoing business relations. With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

Cookies & Browser Web Storage. We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third-party websites. For more details, see our [Cookie Policy](#).

Targeted online advertising. Some of the business partners that collect information about users' activities on or through the Service may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising.

We may allow others to provide analytics services and serve advertisements on our behalf across the internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by Commonwealth and others to, among other things, analyze and track data, determine the popularity of certain content, Services or products, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity.

Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting the user's country, and then clicking "Choices" (or similarly titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, so you may still receive some cookies and tailored advertisements from companies that are not listed.

Choosing not to share your personal information. Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

Third-party platforms or social media networks. If you choose to connect to the Service via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third-party at the time you login to the Service using the third-party's authentication service or otherwise connect your account. Subsequently, you may be able to control your settings through the third-party's platform or service.

Other sites, mobile applications and services

The Service may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfers

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

European Union users should read the important information provided [below](#) about transfer of personal information outside of the European Union.

Children

As a general rule, children are not allowed to use the Service, and we do not collect personal information from them. We define "children" as follows:

- Residents outside of Europe: anyone under 13 years old; and
- Residents of Europe: anyone under 16 years old, or the age needed to consent to the processing of personal information in your country of residence.

If we learn that we have collected personal information of a child without the consent of the child's parent or guardian, we will delete it. We encourage parents with concerns to [contact us](#).

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

How to Contact Us

Please direct any questions or comments about this Privacy Policy or privacy practices to hello@commonwealth.im.

Your California Privacy Rights

Under California's Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes and the categories of personal information disclosed. You may send us requests for this information via email to hello@commonwealth.im. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Notice to European Users

The information provided in this "Notice to European Users" section applies only to individuals in Europe.

Personal information. References to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation. Essentially, it boils down to information about an individual, from which that individual is either directly identified or can be identified. It does not include 'anonymous data' (i.e., information where the identity of individual has been permanently removed).

Controller. Commonwealth Labs, Inc. is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation. See the Contact Us section above for contact details.

Legal bases for processing. We use your personal information only as permitted by law, for the purposes for which we collected it as listed below. In respect of each of the purposes for which we use your personal information, the European data protection legislation requires us to ensure that we have a "legal basis" for that use. Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to perform a contract, we are about to enter into or have entered into with you ("**Contractual Necessity**").
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests ("**Legitimate Interests**"). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation ("**Compliance with Law**").
- Where we have your specific consent to carry out the processing for the Purpose in question ("**Consent**"). Generally, we do not rely on your Consent as a legal basis for using your personal information other than in the context of direct marketing communications.

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information.

Purpose	Category(ies) of personal information involved	Why do we do this	Our legal basis for this use of data
Account Creation	<ul style="list-style-type: none"> Identity information Contact Data Profile information 	To process and manage registrations you make through the Site, including for courses or events that we organize or host and to administer contests and other promotions	<ul style="list-style-type: none"> Contractual Necessity
Operate the Service	<ul style="list-style-type: none"> Identity information Contact information Digital Wallet information Content you choose to upload to the Service Profile information Registration information Feedback or correspondence Other information 	<p>To operate, maintain, administer and improve the Site</p> <p>To better understand your needs and interests, and personalize your experience with the Site</p> <p>To respond to your service-related requests, questions and feedback</p>	<ul style="list-style-type: none"> Contractual necessity Legitimate Interests <p>We have a legitimate interest in providing you a good service, with updates on our Sites and related offers where you have purchased or shown interest in similar services from us.</p>
Compliance, Fraud Prevention and safety	<ul style="list-style-type: none"> Identity information Contact information Digital Wallet information 	<p>To keep our website, our services and associated systems operational and secure</p> <p>To enforce the terms and conditions that govern the Site</p>	<p>Legitimate Interests.</p> <p>We have a legitimate interest in ensuring the ongoing security and proper operation of our services, website and associated IT services and networks.</p>
Troubleshooting	<ul style="list-style-type: none"> Identity information Contact information Feedback or correspondence Profile information Registration information 	<p>To track issues that might be occurring on our systems, provide support and maintenance for the Site</p> <p>To manage and communicate with you regarding your relationship with us, if you have one, including by sending you service announcements, technical notices, updates, security alerts, and support and administrative messages</p>	<p>Legitimate Interests.</p> <p>It is in our legitimate interests that we can monitor and ensure the proper operation of our Sites and associated systems and services.</p>

Purpose	Category(ies) of personal information involved	Why do we do this	Our legal basis for this use of data
Marketing	<ul style="list-style-type: none"> • Contact information • Marketing data • Feedback or correspondence • Registration information • Usage information • Online activity data 	To form a view on what we think you may want or need, or what may be of interest to you. You will have the ability to opt out of such communications. If you have consented to receive marketing communications from our third-party partners, you may withdraw your consent by contacting those partners directly.	Consent.
Job application	<ul style="list-style-type: none"> • Identity information • Contact information • Professional or employment information 	<p>To manage our recruiting and process employment applications</p> <p>To facilitate our recruitment activities and process employment applications, such as by evaluating a job candidate for an employment activity, and monitoring recruitment statistics</p>	<p>Legitimate Interests.</p> <p>We have a legitimate interest in considering your job application.</p>

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

Retention

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Your rights

European data protection laws give you certain rights regarding your personal information. If you are located within the European Union, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to hello@commonwealth.im. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may [contact us](#) or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer

If we transfer your personal information out of Europe to a country not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be performed:

- Pursuant to the recipient's compliance with standard contractual clauses, or Binding Corporate Rules
- Pursuant to the consent of the individual to whom the personal information pertains
- As otherwise permitted by applicable European requirements.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.