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Last Updated: July 1, 2024

PRINT OUR PRIVACY POLICY

This Privacy Policy describes how Circle Internet Group, Inc. and its applicable subsidiaries, (collectively, "Circle", "we", "us" or "our") collects, uses, stores, shares and protects your information. This Privacy Policy describes our practices in connection with information collected through our websites and other Circle services or products ("Circle Services").

This Privacy Policy provides a general overview of our privacy practices regarding your information. It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions and which may be applicable to you when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them. You can learn more about certain jurisdiction-specific information in the applicable sections at the bottom of this Privacy Policy, including information for individuals residing in the European Economic Area ("**EEA**"), Singapore, Switzerland, the United Kingdom, and in California.

1. Overview

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LEGAL PRODUCTS

Circle Pay ^

Circle Pay User Agreement - US

Circle Pay User Agreement - CA & WY

Privacy Policy

2. The Data we Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data over the preceding 12 months about you which we have grouped together as follows:

- **Identity Data** includes first name, middle name, maiden name, last name, title, tax ID, marital status, date of birth, gender, identity document number, nationality and any other information contained in any identification documents you provide to us (e.g. your passport or driver's license).
- **Contact Data** includes billing address, residential address, email address and telephone numbers.
- Financial Data includes bank account details.
- **Transaction Data** includes details of your Circle Services activity such as the amount, date, time, recipient for each transaction.
- **Technical Data** includes your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Circle Services.
- Profile Data includes your username or similar identifier, password, your preferences, feedback and any survey responses.
- Usage Data includes information about how you use the Circle Services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Survey and Customer Feedback Data includes information you provide in any survey or feedback forms on Circle Services.
- Location Data includes information about your device location.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual

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Information about criminal convictions

When you register for Circle Services, we may receive information about your criminal convictions when we perform certain verification or compliance checks. We carry out these checks in order to detect or prevent any unlawful or fraudulent acts and to comply with our legal obligations.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (i.e. to provide the Circle Services to you). In this case, we may have to close your Circle account or limit or restrict your access to other Circle Services, in accordance with the terms of the Circle User Agreement, but we will notify you if this is the case at the time.

3. How We Collect your Personal Data

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact, Financial, Transaction,
 Profile, Usage, Marketing and Communications and Location Data by filling in forms
 or by corresponding with us by post, phone, email or otherwise. This includes
 personal data you provide whensome text
 - you create or use your Circle account;
 - you send a wire transfer to your Circle account;
 - we need to request more information to verify your identity or to meet our legal obligations;
 - o you request marketing to be sent to you;
 - o you participate in a survey; or
 - you give us some feedback.
- Automated technologies or interactions. When you interact with our Circle
 Services, we may automatically collect Usage and Technical Data about your
 equipment, browsing actions and patterns. We collect this personal data by using
 cookies, server logs and other similar technologies. We may also receive Technical
 Data about you if you visit other websites employing our cookies. Please see our
 Cookie Policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties including:some text
 - Technical Data from analytics providers such as Google;
 - Contact, Financial and Transaction Data from providers of technical or payment services;

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that you have obtained consent from such individuals to disclose their personal data to us for processing.

4. How We Use Your Personal Data

We collect all of the information in Section 2 (The Data we Collect About You) so that we can provide you with the Circle Services. The information we collect allows us to:

- Deliver the full functionality of the Circle Services;
- Keep in touch with you whether it be for providing customer service, notifying you
 of new features or updates to the Circle Services, or providing security notices or
 information;
- Verify your identity so that we can prevent fraud or unauthorized activity, and to comply with applicable laws; and
- Fulfill any other purpose for which the information was collected.

We may combine your information with information we collect from other companies and use it to improve and personalize the Circle Services, as well as our content and advertising.

Purposes for which we will use your personal data

We have set out below a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting Support.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact Support if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity

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Lawrui pasis for processing including pasis of legitimate interest

To register you as a new customer.

- Identity
- Contact

Performance of a contract with you.

To deliver the full functionality of the Circle Services.

- Identity
- Contact
- Financial
- Transaction
- Profile
- Marketing and Communications
- Location

Performance of a contract with you.

To manage our relationship with you which will include:

- (a) Notifying you about changes to our terms or Privacy Policy; and
- (b) Asking you to take part in surveys.
- Identity
- Contact
- Profile
- Marketing and Communications
- (a) Performance of a contract with you.
- (b) Necessary to comply with a legal obligation.
- (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

To (i) verify your identity; and/or (ii) detect and prevent fraudulent or other unauthorized activities.

- Identity
- Contact
- Financial
- Transaction
- Usage

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To administer and protect the Circle Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

- Identity
- Contact
- Technical
- (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise).
- (b) Necessary to comply with a legal obligation.

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.

- Identity
- Contact
- Profile
- Usage
- Marketing and Communications
- Technical

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

To use data analytics to improve our website, services, marketing, customer relationships and experiences.

- Identity
- Contact
- Technical
- Usage

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

To (i) improve our product or services; and/or (ii) develop new products or services.

- Identity
- Contact

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- Profile
- Usage
- Marketing and Communications

Necessary for our legitimate interests (to develop our products/services and grow our business).

To make suggestions and recommendations to you about products or services that may be of interest to you through marketing communications.

- Identity
- Contact
- Technical
- Profile
- Usage
- Marketing and Communications

Necessary for our legitimate interests (for our marketing purposes to develop our products/services and grow our business).

Change of purpose

We will only use your personal data in accordance with the purposes described in this Privacy Policy and as provided for under applicable law for the purposes for which we collected it. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Third-party links

The Circle Services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We are not responsible for the data collection and processing practices of the third party and use of any third party websites is subject to their privacy policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

5. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

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we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you (i) have requested information from us; (ii) use our Circle Services; or (iii) provided us with your details when you registered for a promotion and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Circle group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting Support at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your use of the Circle Services, a product/service experience, or other transactions. Opting out will also not opt you out of receiving non-marketing information such as account statements and updates to this Privacy Policy or our user agreement.

6. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Do Not Track ("**DNT**") is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. At this time, we do not respond to DNT signals.

For more information about the cookies we use, please see our Cookie Policy.

7. How We Share Your Personal Data

Sharing with third parties

We may have to share your personal data with the parties set out below for the purposes set out in Section 4 above:

Banking partners - If you link a bank account, we will share your account
information with our banking partners so that we can process payments associated
with wiring funds in and out of your Circle account. We may also need to share your

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- VEITHCALION SELVICE PROVINCES IN ORDER to detect and/or prevent made and comply with our legal obligations, we will sometimes need to share your information with third party identity verification services. This lets us make sure you are who you say you are, by comparing the information you provide us to public records and other third party databases. This may include searches through electronic services such as credit bureaus, but we will not do so in a manner that would have an adverse impact on your credit or credit score.
- Operational service providers In order to deliver the Circle Services to you, we will need to share your information with third parties who provide us with certain tools/services including data storage, onboarding, customer service platforms, accounting and invoicing, IT, email, SMS text, and other communication channels, security and fraud detection.
- Other service providers In order to improve Circle's functionality, we will sometimes share your information with service providers that help us analyze how people are using the Circle Services in order for us to refine the product. We may also share your information with services providers who help us to deliver certain advertising/marketing campaigns in order to grow our business.
- Law enforcement agencies and regulators we may need to share your information with law enforcement or government or public officials. We will only do this when we are compelled to do so by a specific regulation, subpoena, court order or formal request, or we otherwise believe in good faith that we need to share such information to prevent physical harm, financial loss, or are obligated to report illegal and other suspicious activities, and we will endeavor to share the minimum amount of required information.
- Group companies Information may be shared with Circle group of companies in order to, inter alia, meet our legal and regulatory obligations. EEA Customers should be aware that affiliates of Circle Internet Financial, LLC are likely to act as processors in respect of your personal information in order to provide you with the best possible service and customer support.
- Business Partners From time to time Circle may partner with other companies ("Partners") to allow you to transact with individuals that are customers of such Partners and not Circle. In order to complete these transactions, we will need to share information regarding your Circle account (such as name, email address, phone number and date of birth) with the applicable Partner so that they can meet their legal and regulatory obligations. Your information will only be shared with such Partners to the extent you transact or interact with customers of such Partners.
- Professional advisers In order to complete third party financial, technical, compliance and legal audits of Circle's operations or otherwise comply with our legal obligations, we may need to share information about your Circle account as part of such review with professional advisers acting as processors or joint controllers who provide consultancy, banking, legal, compliance, insurance or accounting services.
- Third parties in business transactions We may choose to sell, transfer, or merge parts of our business or our assets to third parties. Alternatively, we may acquire

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- Third parties you authorize us We will share your information with other third parties if you specifically authorize us to do so. For example, you may Request to transfer your data from Circle to a third-party under your applicable legal rights.
- **Sub-processors** A list of affiliates and partners that act as sub-processors for Circle who may process your personal data is available here. By agreeing to this Privacy Policy, you consent to such sub-processors collecting and processing your personal information pursuant to the terms hereof.

8. International Transfers

Circle conducts business throughout the world. Personal data may be stored and processed in any country where we do business or our service providers do business. We may transfer your personal data to other countries, which may have different data protection laws. When transferring data across borders, we take measures to comply with applicable data protection laws related to such transfer.

If you are located in the European Economic Area ("EEA"), the UK, Singapore or Switzerland, we rely on the Standard Contractual Clauses (SCCs) to provide an adequate level of data protection for the transfer of your Personal Data from the EEA, the UK, or Switzerland, where the country of import is not deemed adequate under applicable law.

9. How We Protect Your Personal Data

We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to data centers and information access authorisation controls.

Sometimes in order to better secure your information and use it for the purposes contemplated by this Privacy Policy, certain personal data may be stored with our third party partners and service providers. The full list of our third party partners and service providers can be found here.

10. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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



solicit or collect information from anyone under 18. If we become aware that a person under the age of 18 has provided us with personal information, we will delete it immediately.

12. Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We may change this Privacy Policy from time to time. When we do make updates, we'll let you know by changing the date at the top of this Privacy Policy. If it is a more extensive or significant update, we'll send you a notification or post a notice on our website. If you ever have any questions about changes made to the Privacy Policy, just reach out to Support.

It is important that the personal data we hold about you is accurate and current. If you need to add or change any information, you can just log in to your Circle account and make the change in your settings. If you cannot make the change on your own, just reach out to Support and we'll take care of it. Please keep us informed if your personal data changes during your relationship with us.

13. Questions

If you have any questions about this Privacy Policy, feel free to reach out to privacy@circle.com or DPO@circle.com.

Customers in the the EEA, UK, and Switzerland

The following Section applies to Customers in the EEA, UK, and Switzerland only and supplements the information contained in the Privacy Policy.

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your explicit consent to do so.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting Support.

For the purposes of the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the UK Data Protection Act 2018 and the UK GDPR, and the Swiss Federal Act on

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Data Protection Officer ("DPO")

Circle has appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your rights, please contact us using the details set out below.

Contact: DPO@circle.com

Phone number: (888) 762-4966

You have the right to make a complaint at any time to your data protection authority. We would, however, appreciate the opportunity to deal with your concerns before you approach your data protection authority so please contact DPO@circle.com in the first instance.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

Request access

This enables you to receive a copy of whether your personal data is being processed or collected, what and how personal data about you is being processed and collected, and what the data processing operations are. This is also commonly known as a "data subject access request".

Request correction

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

If you need to add or change any information, you can just log into your Circle account and make the change in your settings. If it doesn't look like you can make the change on your own, please reach out to Support and we'll take care of it.

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This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with applicable law.

Please note: your right of deletion would not take precedence for various reasons including if we need to retain your personal data in order to comply with a legal obligation or to establish or defend a legal claim. Where we are unable to comply with your request of deletion, we will notify you at the time of your request.

Object to processing

You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

You also have the right to object where we are processing your personal data for direct marketing purposes.

In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

You may also be entitled to object to automated decision-making in certain circumstances.

Request restriction on processing

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but you do not want us to delete it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

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Request for data portability

If you ask us, we will provide to you or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdrawal of consent

This applies where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact Support.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at https://feedback-form.truste.com/watchdog/request.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

California Customers

The following Section applies to California customers only and supplements the information contained in the Privacy Policy.

Rights under the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA")

In addition to the rights provided in the Privacy Policy above, the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA") provides consumers (California residents) with specific rights regarding their personal information, subject to limited exceptions. In this Section, we will refer to both the CCPA and CPRA collectively as the "CPRA." Under the CPRA, "personal information" includes information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Circle collects personal information that may be covered by other laws, rules and regulations, including but not limited to the Gramm-Leach-Bliley Act and its related implementing regulations, and, therefore, such personal information may be exempt from the provisions of the CPRA. Although some categories of data collected by Circle may be exempt from the CPRA, the full list of categories of personal information collected can be found in Section 2 (the Data We Collect About You).

When we talk about the "sale" or "sharing" of personal information, we are also using those terms as they are defined in the CPRA.

This section describes your CPRA rights and explains how to exercise those rights.

Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. You have the right to request that we disclose to you:

(a) the categories of personal information we've collected about you, (b) the categories of the sources from which the personal information is collected, (c) the business or commercial purposes for collecting, selling, or sharing the personal information, (d) the categories of third parties to whom we've disclosed personal information, and (e) the categories of personal information we've disclosed for a

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Right to portability (request a copy of your personal information)

You have the right to request and receive the specific pieces of personal information we've collected about you in a commonly used, machine readable format.

Right to correct

You have the right to correct inaccurate personal information that we have collected from you and retained.

Right to delete

You have the right to request that we delete any of the personal information that we've collected from you and retained, subject to certain exceptions.

Right to opt-out of sale and sharing

You may request to opt out of any "sale" or "sharing" of your personal information that may take place.

Right against discrimination

You have the right not to be discriminated against for exercising any of your CPRA rights.

Do not sell or share personal information

Circle discloses personal information to third parties for its targeted advertising and data analytics purposes. These disclosures may be considered "selling" and/or

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The California Privacy regulations require us to state whether we have actual knowledge that we have sold or shared the personal information of consumers under 16 years of age. As stated in our User Agreement, the Circle Services are not for use by anyone under the age of 18. We do not sell or share personal information of consumers we actually know are under 16 years of age.

Exercising your rights

To exercise any of your California privacy rights described above, please submit a request here.

Only you, or your authorized agent acting on your behalf, may make a request related to your personal information.

Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: your full name, prior communications with Circle.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. If we are unable to verify your identity from information we have available, we may request additional information from you to verify your identity. If you use an authorized agent to make a request on your behalf, we may require proof from you that they have been authorized directly by you to act on your behalf. We will only use personal information provided in the request to verify the requestor's identity or authority to make it and for security or fraud prevention purposes.

We will respond to your rights request as required under the CPRA. We are only obligated to respond to a request from you, or your authorized agent acting on your behalf, twice within a 12-month period.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Please note that the above rights are not absolute, and we may be entitled to refuse requests in whole or in part, where exceptions under applicable law apply.

Retention of personal information

Please see the "Data Retention" section in the Privacy Policy above for information about how long we retain the personal information we collect.

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with respect to the Circle Services and, for each category of personal information collected, the business or commercial purposes for which the information was collected and used, and the categories of third parties to whom we disclosed the personal information for a business purpose.

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Sources of personal information

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We collect this personal information directly from California residents themselves, automated technologies, Circle entities, and third parties. The sources of personal information collected are noted in How We Collect Your Personal Data.

Category of Personal Information Collected

Categories of Parties to Whom Information is Disclosed

Categories of Third Parties to Whom Information Was Sold and/or Shared

Identifiers (such as name, postal address, unique personal identifier, email address, social security number, Internet Protocol address, or other similar identifiers)

- Service providers
- Circle entities
- Advertising, analytics, and marketing vendors

The categories of Personal Information in CPRA § 1798.80(e) (such as name, signature, Social Security number, physical characteristics or description, address, telephone number, employment history, certain financial information like credit card number)

- Service providers
- Circle entities

N/A

Protected classification characteristics under California or federal law(such as age, race, national origin, gender, gender identification, sexual orientation, religion, marital status, disability status, citizenship)

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Urcie entities

N/A

Commercial information (such as records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)

- · Service providers
- · Circle entities
- · Advertising, analytics, and marketing vendors

Electronic network activity information (such as browsing history, search history, and information regarding interaction with a website or online application)

- · Service providers
- · Circle entities
- Advertising, analytics, and marketing vendors

Geolocation data(such as geolocation coordinates when using a mobile device)

- · Service providers
- · Circle entities
- · Advertising, analytics, and marketing vendors

Professional or employment information(such as job title, employer)

- Service providers
- Circle entities

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Audio, electronic, visual, thermal, olfactory, or similar information(such as from video conferences and recorded phone calls)

- Service providers
- · Circle entities
- · Advertising, analytics, and marketing vendors

Inferences drawn from any of the information identified above

- · Service providers
- Circle entities
- Advertising, analytics, and marketing vendors

Sensitive personal information (social security number, account log-in and password)

Service providers

N/A

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About USDC	Cross-border	Developer Hub	About us	NEWSLETTER		
Transparency	payments	Documentation	Careers WE'RE HIRING	Enter your ema	SUBSCRIBE	
			Pressroom			

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