

# Base Global Privacy Policy

Last updated: July 12, 2023

At Base (referred to here as “we”, “us” or “our”), we respect and protect the privacy of those users and developers (“you” and “your” or “Users” and “Developers”, as relevant) who explore and use Base (“Base”) through the Base protocol or any other applications, tools, and features we operate (collectively, the “Services”).

This Privacy Policy describes how we collect, use, and disclose personal information when you use our Services, which include the services offered on our website <https://base.org> (“Site”). This Privacy Policy does not apply to any processing which Base carries out as a processor on behalf of those Users and Developers who explore and use Base. Please note that we do not control websites, applications, or services operated by third parties, and we are not responsible for their actions. We encourage you to review the privacy policies of the other websites, decentralised applications, and services you use to access or interact with our Services.

## 1. WHAT INFORMATION WE COLLECT

We collect the following personal information when providing the Services:

Information you provide

- Your public wallet address (“Wallet Address”)
- Publicly available blockchain data (“Blockchain Data”)
- Where you agree to engage in our surveys or sign up to receive marketing communications about Base products and offerings, we will ask for the following “Basic User Information”
  - Name
  - Email
  - Social media handles
  - Business name

Information Collected Automatically

- App, Browser and Device Information:
- Information about the device, operating system, and browser you’re using~~ ~~
- Other device characteristics or identifiers (e.g. plugins, the network you connect to)
- IP address/derived location information

Information we obtain from Affiliates and third parties

- Information from Coinbase Companies (“Affiliates”): We may obtain information about you, such as Basic User Information from our Affiliates (for instance, if you use Base with your Coinbase-hosted wallet) as part of facilitating, supporting, or providing our Services.
- Blockchain Data: We may analyze public blockchain data, including timestamps of transactions or events, transaction IDs, digital signatures, transaction amounts and wallet addresses
- Information from Analytics Providers: We receive information about your website usage and interactions from third party analytics providers. This includes browser fingerprint, device information, and IP address.
- Error Tracking Data: We utilize information from third party service providers to provide automated error monitoring, reporting, alerting and diagnostic capture for Service and Site errors to allow User or Developers to build more effectively on the Base platform.

## 2. HOW WE USE YOUR INFORMATION

We may use your personal information for the following purposes or as otherwise described at the time of collection. If you reside outside the United Kingdom or European Economic Area (“EEA”), the legal bases on which we rely in your country may differ from those listed below.

**Purpose Information Used Our Legal Basis** To provide you with the Base Services We use certain information that is necessary to conclude and perform our Terms of Service or other relevant contract(s) with you. **Wallet AddressBlockchain Data Contractual Necessity** To promote the safety, security and integrity of our Services **Basic User InformationInformation**

from Analytics Providers Contractual Necessity To allow Users or Developers to build more effectively on the Base platform  
Error Tracking Data Legitimate Interests To send you Base Forms for marketing and product development Basic User  
Information Legitimate Interests

## 3. HOW AND WHY WE SHARE YOUR INFORMATION

We share certain information about you with service providers, partners and other third parties in order to help us provide our Services. Here's how:

**Affiliates.** Basic User Information that we process and collect may be transferred between Affiliates, Services, and employees affiliated with us as a normal part of conducting business and offering our Services to you.

**Linked Third Party Websites or Services.** When you use third-party services (like when you connect your self-custodial wallet to decentralized applications on the Base network) or websites that are linked through our Services, the providers of those services or products may receive information about you (like your wallet address) from Base, you, or others. Please note that when you use third-party services or connect to third-party websites which are not governed by this Privacy Policy, their own terms and privacy policies will govern your use of those services and products.

**Professional advisors, industry partners, authorities and regulators.** We share your information described in Section 1. What Information We Collect with our advisors, regulators, tax authorities, law enforcement, government agencies, and industry partners when needed to:

- respond pursuant to applicable law or regulations, court orders, legal process or government requests;
- detect, investigate, prevent, or address fraud and other illegal activity or security and technical issues; and
- protect the rights, property, and safety of our Users, Developers, Affiliates, or others, including to prevent death or imminent bodily harm.

**Vendors and Third-Party Service Providers.** When we share information with third-party service providers to help us provide our Services, we require them to use your information on our behalf in accordance with our instructions and terms and only process as necessary for the purpose of the contract.

## 4. HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We retain your information as needed to provide our Services, comply with legal obligations or protect our or others' interests. While retention requirements vary by country, we maintain internal retention policies on the basis of how information needs to be used. This includes considerations such as when the information was collected or created, whether it is necessary in order to continue offering you our Services or to protect the safety, security and integrity of our Services, and whether we are required to hold the information to comply with our legal obligations.

## 5. CHILDREN'S PERSONAL INFORMATION

The Services are not directed to persons under the age of 18, and we do not knowingly request or collect any information about persons under the age of 18. If you are under the age of 18, please do not provide any personal information through the Site or Services. If a User submitting personal information is suspected of being younger than 18 years of age, we will take steps to delete the individual's information as soon as possible.

## 6. INTERNATIONAL TRANSFERS

To facilitate our global operations, we and our third-party partners and service providers may transfer and store throughout the world, including in the United States.

If you reside in the EEA, Switzerland, or the United Kingdom, we rely upon a variety of legal mechanisms to facilitate these transfers of your personal information (collectively, "European Personal Data"). \*\*\*\*

- We rely primarily on the European Commission's Standard Contractual Clauses to facilitate the international and onward transfer of European Personal Data to third countries, including from our EU operating entities to Coinbase, Inc. in the United States, who provides the primary infrastructure for the Services.
- We also rely on [adequacy decisions](#)
- from the European Commission where available and exemptions provided for under data protection law (e.g. Article 49 GDPR).

## 7. HOW TO CONTACT US WITH QUESTIONS

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, please contact us at [privacy@base.org](mailto:privacy@base.org).

## 8. CHANGES TO THIS PRIVACY POLICY

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well. We post any changes we make to our Privacy Policy on this page and, where appropriate, we will provide you with reasonable notice of any material changes before they take effect or as otherwise required by law. The date the Privacy Policy was last updated is identified at the top of this page.

## 9. OUR RELATIONSHIP WITH YOU

Coinbase Technologies, Inc., 251 Little Falls Drive, City of Wilmington, County of New Castle, Delaware 19808, acts as controller of your personal data.

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