| **DISCLAIMER: For Informational Purposes Only**  The Privacy Policy template provided is for general informational purposes only and does not constitute legal advice. This template is intended to serve as a starting point for drafting legal documents; however, it may not address your specific circumstances or comply with the laws applicable to your jurisdiction.  You should not use this template without first consulting a qualified legal advisor who can tailor it to your unique needs and ensure compliance with relevant laws and regulations. The use of this template does not create an attorney-client relationship between you and the provider of this document.  We disclaim all liability for any actions taken or not taken based on the content of this document. Use of this template is at your own risk, and you are solely responsible for ensuring its accuracy, legality, and appropriateness for your purposes. |
| --- |

| A Privacy Policy is a crucial legal document for any company with a website or online service. It promotes transparency and trust with users by outlining how their data is collected, used, stored, and shared. This ensures compliance with data protection laws, builds user trust, and references other important policies (like Terms of Service and Cookie Policy). It also details your data retention practices and security measures.  Assumptions:   * Your company owns and operates the website and all its features. * Your company is not based in the EU, UK, Switzerland, or California, but has users there. * Your company does not offer financial incentives, sell user data, or share sensitive user data. |
| --- |

**Policy template follows on next page**

Version 1

Last updated: 9 April 2025

**Privacy Policy**

**Last Modified: [DATE]**

# Introduction

*[Name of the company that owns and operates the website, apps and tools]*, (“**Company**”, “**us**” or “**we**”) respects your privacy and is committed to providing you with data about our and our service providers’ data handling practices through this Policy.

*[In this paragraph, consider what your Policy covers - does it cover just the website, or/and your apps? Update the wording to reflect your situation]* This Policy describes the types of data we and our services providers may collect from you or that you may provide when you visit our website *[Company Website url]* (the “**Website**”), when you use any mobile applications to which this policy is posted (collectively, the “**Apps**” and each, an “**App**”), as well as any tools, code or other software made available for download on the Website or the Apps, such as decentralized applications, crypto wallets and web3 development tools (collectively, the “**Tools**”) *[ensure these definitions are applicable in your context and if not amend this section accordingly and the rest of the Policy throughout as definitions of Apps and Tools are used throughout the Policy*].

This Policy (the “**Policy**”) is part of the **Terms of Use** *[Note: link to your company’s Terms of Use or Terms of Service here]* applicable to the use of the Website, the Apps and the Tools. Please review this policy together with the Terms of Use*[Note update this term if linking to Terms of Service]*, to understand all of your rights and obligations, and how we operate the Website, the Apps and the Tools.

Your access and use of the Website, Apps, and Tools constitutes your acceptance and agreement to be bound by this Privacy Policy and the Terms of Use. If you do not agree with these terms, do not use or access the Website, Apps, or Tools.

This Policy applies to data that we and/or our service providers collect through the following:

* Visiting or using the Website, the Apps, and the Tools, including any electronic messages
* Electronic messages between you and the Website, the Apps, and the Tools
* Mobile and desktop applications, if any, that you download from the Website or the Apps, or relating to the Tools, if this policy is posted to them
* Our advertising and applications on third-party websites and services, if such advertising or applications include links to this policy
* Any other means associated with or relating to the Website, the Apps, and the Tools

This policy does not apply to data collected by:

* Us or our service providers offline or through any other means, including on any other website or apps operated by Company or any third party (including our respective affiliates, subsidiaries and service providers); or
* Any third party who is not a provider of the Tools made available on or through the Website and the Apps.

**This Privacy Policy may change from time to time. Your continued use of the Website, the Apps and the Tools after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates**.

# Children under the Age of Eighteen (18)

The Website, the Apps and the Tools are not intended for children under eighteen (18) years of age. No one under age eighteen (18) may provide any personal data to us or our service providers or on or through the Website, the Apps and the Tools. We and our service providers do not knowingly or intentionally collect personal data from children under the age of eighteen (18). If you are under eighteen (18), do not use or provide any data on or through the Website, the Apps and the Tools, or register on the Website, the Apps, or the Tools, make any purchases through the Website, the Apps, or the Tools, use any of the interactive or public comment features of this Website, the Apps or the Tools or provide any data about yourself to us or our service providers, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we or our service providers learn we have collected or received personal data from a child under eighteen (18) years of age, we will delete that data. If you believe we or our service providers might have any data from or about a child under the age of eighteen (18), please report this data at *[Your company’s email address for enquiries related to data privacy]*.

# Data We and Our Service Providers Collect About You and How We Collect It

*[Consider what types of data your company and third party service providers collect and how this is done as part of your day-to-day operations and include it - review the suggestions below and select what is relevant to your operations. It’s advisable to keep the list general and broad to provide flexibility as business needs change and as a result so will the types of data you collect…. The types of data and the means of collection listed or referenced below is a guide only and should be adapted to your company’s circumstances]*

We and our service providers may collect several types of data from and about users of the Website, the Apps and the Tools (some of which is considered “**personal data**” pursuant to applicable law), including:

* Identifiers, such as name, mailing address, e-mail address, telephone number, company data, or any other data that the Website, the Apps and the Tools collect, which applicable law may consider personally identifiable, personal data, personal data, and other such designations;
* data about the device you use to access the Website, the Apps and the Tools;
* Your IP address, Identifier for Advertisers (“**IDFA**”), Android/Google Advertising ID, International Mobile Equipment Identity (“**IMEI**”), or another unique identifier;
* Your device characteristics and functionality (including data about your operating system, hardware, mobile network, browser, browser language, etc.);
* Referring and exit web pages and URLs;
* Your browsing history, including the areas within the Website, the Apps and the Tools that you visit and your activities there, including remembering you and your preferences;
* Your device location or other geolocation data;
* Certain other device data, including the time of day you visit the Website, the Apps and the Tools; and
* data about your internet connection and internet provider.

We and our service providers collect this data:

* Directly from you when you provide it to us, such as when filling in forms on the Website, the Apps and the Tools (including when you register for an account, subscribing to a service, or requesting something from us or our service providers, or when you fill out surveys, if any such features are available to you).
* Automatically as you navigate through the Website, the Apps and the Tools, including through the use of cookies, web beacons, and other tracking technologies (including data about your network or computing device) and analytics services;
* From third parties, for example, our respective business partners and service providers;
* Records and copies of your correspondence (including email addresses), if you contact us through the Website and the Apps, or our service providers through the Tools;
* When you engage in transactions on the Website, the Apps and the Tools;
* When you run searches on the Website, the Apps and the Tools; and
* When you contact our or our service providers’ customer service agents, if available.

# Automatic Data Collection Technologies

*[Consider your company’s use of automatic data collection technologies - the behind-the-scenes tools that websites and apps use to understand user behavior and improve the company’s services. The suggested wording below is a guide only and should be adapted to your company’s circumstances]*.

We and our designated service providers utilize a variety of automatic data collection technologies to gather information about you, your devices, and your online behavior. This data encompasses details about your visits to our Website, Apps, and Tools — including the specific pages or features you access, the duration of your visits, and the actions you take — and is collected using technologies that include, but are not limited to, cookies, web beacons, embedded scripts, and log files. These technologies operate both on our platforms and across third-party websites over time. For further information regarding the cookies we employ and for guidance on how to control and remove cookies, please refer to our Cookie Policy *[Note: link to your company’s cookie policy here]*.

We may also collect information about your device and internet connection, such as your IP address, browser type, operating system, and device identifiers. Additionally, we may track your online activities, such as the websites you visit, the links you click, and the searches you perform.

The purposes of this data collection include:

* Providing and enhancing the functionality, performance, and user experience of our Website, Apps, and Tools.
* Detecting, preventing, and mitigating fraudulent activity, safeguarding both our users and our business.
* Delivering relevant and personalized content, including advertisements, recommendations, and other communications that are tailored to your interests and preferences.
* Estimating the size and composition of our audience to inform our business strategy and marketing efforts.
* Analyzing the effectiveness and efficiency of our services, identifying areas for optimization and innovation.

While we strive to provide you with a seamless and personalized experience, we also respect your privacy and recognize your right to control your data. To that end, we provide you with a range of options to manage your data collection settings. You can adjust certain settings in your browser or device, such as disabling cookies or blocking third-party tracking. However, please note that doing so may limit your ability to access certain features or functionalities of our Website, Apps, and Tools.

# Behavioral Advertising

We and our service providers may use your personal data to provide you with targeted advertisements or marketing communications that we believe may be of interest to you. To learn more about how targeted advertising works, visit the Network Advertising Initiative’s (NAI) educational page at<http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

# Do Not Track

Do Not Track (DNT) is a feature offered by some web browsers, including Internet Explorer, Firefox, and Safari, that lets users indicate their preference not to have their online activity tracked. This preference can usually be set in the browser's preferences.

While some regulatory authorities and industry groups support developing a mechanism to standardize DNT across the internet, websites currently respond to DNT browser settings in different ways. If a website responds to a DNT signal by deactivating certain cookies or tracking technologies, the site may no longer recognize the user, save passwords or usernames, or provide full functionality.

# Third-Party Use of Cookies and Other Tracking Technologies

Third-party advertisers, ad networks, servers, content providers, and application providers may serve some content or applications, including advertisements on the Website, Apps, and Tools. These third parties may use cookies, web beacons, and other tracking technologies to collect data about you when you use the Website, Apps, and Tools. This data may be associated with your personal data or they may collect data, including personal data, about your online activities over time and across different websites and other online services. They may use this data to provide you with interest-based (behavioral) advertising or other targeted content. We and our service providers do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

# How We and Our Service Providers Use Your Data

*[Consider how your company and service providers use the data collected from users. The suggested wording below is a guide only and should be adapted to your company’s circumstances]*

We and our service providers may use data that we each collect about you or that you provide to each of us or on the Website, the Apps and the Tools, including any personal data:

* To present the Website, the Apps and the Tools and their contents to you;
* To provide you with data, products, or services that you request fromus and our service providers;
* To provide you with notices about your account, the Website, the Apps and/or the Tools;
* To carry out our and our service providers’ obligations and enforce our respective rights arising from any contracts entered into between you and each of us, including for billing and collection, if needed;
* To notify you about changes to the Website, the Apps and the Tools or any products or services we or our service providers offer or provide though them;
* To allow you to participate in interactive features on the Website, the Apps and the Tools, if any;
* To develop and improve our and our service providers’ products and services;
* For behavioral tracking, profiling and advertising;
* For any other purpose as needed for our and our service providers’ businesses;
* For any other purpose with your consent;
* To contact you about our own, our service providers’, and third-parties’ goods and services that we each think may be of interest to you;
* To enable us and our service providers to display advertisements to each of our advertisers’ target audiences; and
* To comply with applicable laws, regulations, and contractual obligations.

# Disclosure of Your Data

*[Consider all instances that your company and service providers disclose aggregated and anonymized data and to whom such data is disclosed to. The suggested wording below is a guide only and should be adapted to your company’s circumstances]*

We and our service providers may disclose aggregated data about users, and data that does not identify any individual, without restriction.

We and our service providers may disclose personal data that we each collect or you provide as described in this Policy:

* To our and our service providers’ affiliates;
* To contractors, service providers (in addition to the service providers that provide the Tools), and other third parties we each use to support our respective businesses and assist in providing services and offering products;
* To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our or our service providers’ assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us or our service providers about the users of the Website, the Apps and/or the Tools is among the assets transferred;
* To third parties to market their products or services to you;
* To fulfill the purpose for which you provide it;
* For any other purpose disclosed by us or our service providers when you provide the data; and
* With your consent.

We and our service providers may also disclose your personal data:

* To comply with any court order, law, or legal process, including responding to any government, law enforcement, or regulatory request under any applicable laws, regulations, legal processes, or government requests;
* To enforce or apply the **Terms of Use/Service**, including this Privacy Policy, and any other agreements between you and us or you and our service providers, including for billing and collection purposes; and
* If we or our service providers believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our service providers, our customers, or others. This includes exchanging data with other companies and organizations for the purposes of fraud protection and credit risk reduction.

# Data Security

*[Ensure your company and service providers have implemented data security measures. The suggested wording below is a guide only]*

We and our service providers have implemented measures intended to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. However, the safety and security of your data also depends on you. Where we or our service providers have given you (or where you have chosen) a password for access to certain parts of the Website, the Apps and the Tools, you are responsible for keeping this password confidential. We and our service providers ask you not to share your password with anyone and to change your password from time to time. We and our service providers also highly recommend that you use a password that is dissimilar to and cannot be easily found by unauthorized third parties who may have obtained your login credentials to other sites. Keep in mind that if you use the same password for all websites, if someone obtains your credentials for one site, they may be able to then use those credentials to log into any other site you use.

Unfortunately, the transmission of data via the internet is not completely secure. Although we and our service providers try to protect your personal data, we and our service providers cannot guarantee the security of your personal data transmitted through or collected through the use of the Website, the Apps and the Tools. Any transmission of personal data is at your own risk.

We and our service providers are not responsible for circumvention of any privacy settings or security measures contained on the Website, the Apps and the Tools.

# Changes to This Privacy Policy

It is our policy to post any changes made to the Policy on this page. When changes are made, we will post a revised version on our Website with the last updated and effective date posted on the top of this page.

# Contact data

To ask questions or comment about this Policy and our privacy practices, please direct such inquiries to:

E-mail: *[Your company’s email address for enquiries related to data privacy]*

CALIFORNIA ADDENDUM TO PRIVACY POLICY

*[Even if your company isn’t based in the U.S., adding a California privacy addendum to your policy is important if you collect data from California residents or meet certain criteria under California privacy laws (CCPA/CPRA). These laws apply to businesses worldwide and can lead to fines if you don’t follow the rules. Including the addendum shows you care about privacy, builds trust with customers, and helps ensure your company complies with global privacy standards. It’s a simple way to avoid legal risks and protect your reputation.]*

**This section of the Policy applies solely to California residents.**

We adopt this Section of the Policy in order to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) as amended by the California Privacy Rights Act of 2020 (“**CPRA**”).

Please note that certain terms used in this California-specific section of the Policy, such as “personal data,” “Sale,” “Share” and “Sensitive personal data” have the meanings given to such terms in the CCPA/CPRA, and not the common meanings of these terms in conversational English. The CCPA does not apply to certain data, which may be subject to the Gramm-Leach-Bliley Act (“GLBA”), the Fair Credit Reporting Act, or certain other state or federal privacy laws.

## California Residents

California Civil Code Section § 1798.83, known as the “*Shine The Light*” law, permits users of the Website, the Apps and the Tools who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for direct marketing purposes in the preceding year, and the names and addresses of those third parties. You may request this data no more than once a year, but such request will be handled free of charge to you. To make such a request, please send an email to *[Your company’s email address for enquiries related to data privacy]*.

## Do Not Track and Global Privacy Controls

The Website, Apps, and Tools currently respond to global privacy control (GPC) signals. We will make reasonable efforts to ensure compatibility with future GPC opt-out requests as technology evolves. To opt out of tracking on the Website, Apps, and Tools, enable the "do not track" or GPC setting in your browser's privacy settings, usually under cookie settings. Not all browsers currently have GPC extensions. Check your browser company's website for availability. For example, Mozilla provides instructions for enabling their experimental GPC control here:<https://blog.mozilla.org/netpolicy/2021/10/28/implementing-global-privacy-control/>.

## Notice of Financial Incentives

*[If your company sells user data, it should be disclosed and this section should be amended accordingly - we recommend you seek formal legal advice if you are selling user data or provide financial incentives to users to share their personal data with your company]*

At this time, we do not offer any financial incentives for processing your personal data.

## Data Collection

We have collected the following categories of personal data for the following purposes within the last twelve (12) months:

| **Categories of Personal Data** | **Sources of Collection** | **Purpose for Collection** |
| --- | --- | --- |
| **Identifiers and Personal Data:** Name, postal address, email address, social security number (SSN), IP address, account data. | Business partners, employees, job applicants, independent contractors, Website/App/Tool users and activity. | Provide, market, and improve products/services.  Identify potential customers/users.  Employment processes (payroll, insurance, benefits, background checks). |
| **Protected Characteristics:** Age, citizenship, gender, military status. | Employees, job applicants. | Employment processes (payroll, insurance, benefits, background checks). |
| **Transaction Records**: Consumer activity on Website/Apps/Tools. | Website/App/Tool users and activity. | Provide, market, and improve products/services.  Research and development.  Maintain business relationships. |
| **Browsing Data**: IP address, browsing activity, device/browser information. | Website/App/Tool activity. | Provide, market, and improve products/services.  Internal reporting and data security. |
| **Location Data** | Website/App/Tool activity. | Provide, market, and improve products/services. |
| **Employment Data**: Job history, educational records/transcripts of employees/job applicants. | Employees, job applicants. | Employment processes (payroll, insurance, benefits, background checks). |
| **Inferences**: User profiles reflecting preferences, behaviors, usage trends on Website/Apps/Tools. | Website/App/Tool activity. | Provide, market, and improve products/services.  Research and development. |
| **Biometric data** | none | none |
| **Sensory data** | none | none |

We do not knowingly or intentionally collect any personal data of persons under the age of 16

## California Consumer Rights Pursuant to the CCPA/CPRA

California consumers have the right to request that we disclose the following data covering the past twelve (12) months:

* Specific pieces and categories of personal data collected;
* Categories of sources and third parties;
* Our business purpose for collecting, Selling, or Sharing personal data; and categories of personal data Sold, Shared, or disclosed for a business purpose
* The categories of Sensitive personal data collected or used and whether such data is Sold or Shared.

California consumers also have the right to request correction or deletion of their personal data (with exceptions noted by law), and to limit use and disclosure of Sensitive personal data.

Additionally, they have the right to request that their personal data not be Sold or Shared with third parties, and not to be discriminated or retaliated against for exercising these rights.

## Data Deletion

If you request deletion of your Personal Data, we may be unable to comply if it is needed to:

* Complete a transaction, provide a good or service, or perform a contract;
* Detect, investigate, or protect against security incidents or illegal activity;
* Debug to repair errors;
* Exercise free speech or other legal rights;
* Comply with the California Electronic Communications Privacy Act;
* Engage in public or peer-reviewed research in the public interest, with your consent;
* Enable internal uses that are reasonably aligned with your expectations;
* Comply with a legal obligation; or
* Use your Personal Data, internally, in a lawful and compatible manner.

## Non-Discrimination

We won't discriminate against you for exercising your CCPA/CPRA rights. We won't deny you goods or services, charge different prices, or provide different quality unless permitted by CCPA/CPRA. We may offer CCPA/CPRA-permitted financial incentives that result in different prices or quality levels, but these will reasonably relate to your data's value and require your prior opt-in consent, which you can revoke anytime.

## Do Not Sell or Share My Personal Data

*[Note: Under the CCP/CPRA, companies have specific obligations to California residents regarding the "Do Not Sell or Share My Personal Data" requirement.]*

We do not sell personal data, but we may share it for targeted advertising.

As a California consumer, you have the right to opt out by sending an email to *[Your company’s email address for enquiries related to data privacy]*..org ofthe sharing of your personal data to third parties.

In the past year, we have shared the following categories of personal data about California residents with third parties for the purposes stated below.

| **Categories of Personal Data Shared** | **Categories of Third Party with Whom Personal Data Was Shared** | **Reason for Sharing** |
| --- | --- | --- |
| **Identifiers and Personal Data:** Name, postal address, email address, social security number (SSN), IP address, account data. | Our service providers (including cookies and analytics)  Our marketing agencies and service providers | To market our products and services |
| **Transaction Records**: Consumer activity on Website/Apps/Tools. |
| **Browsing Data**: IP address, browsing activity, device/browser information. |
| **Location Data** |
| **Inferences**: User profiles reflecting preferences, behaviors, usage trends on Website/Apps/Tools. |
| **Biometric data** | none | none |
| **Sensory data** | none | none |

We do not knowingly or intentionally Sell or Share any personal data of children under the age of 16.

We may share your Personal Data with third party service providers who perform services on our behalf. These include entities that help us track your interactions with the Website, the Apps and the Tools, and provide advertising and marketing services.

| **Company** | **Link to Privacy Policy** | **Services provided** |
| --- | --- | --- |
| *[Add names of third-party service provider]* | *[privacy policy url]* | *[describe services provided, for example: collection, organization, and transmission of data to our systems, data warehousing, Data analytics, monitoring, technical administration and functionality, and user authentication]* |

## Data Disclosure

In the past year, we have shared the following categories of California residents' personal data for business reasons:

| **Category of Personal Data Disclosed for a Business Purpose** | **Category of Persons to Whom Personal Data Was Disclosed** | **Purpose for Disclosing for a Business Purpose** |
| --- | --- | --- |
| **Identifiers and Personal Data:** Name, postal address, email address, social security number (SSN), IP address, account data. | Our marketing service providers  Our service providers (including cookies and analytics)  Our support/maintenance service providers  Our benefits and payroll service providers and partners | Provide, market, and improve our products and services  Research and development  Employment, payroll, insurance, benefits, and background checks  Maintain business relationships |
| **Protected Characteristics:** Age, citizenship, gender, military status. | Our benefits and payroll service providers and partners | Employment, payroll, insurance and benefits, for background checks |
| **Transaction Records**: Consumer activity on Website/Apps/Tools. | Our marketing service providers  Our service providers (including cookies and analytics) | Provide, market, and improve our products and services  Research and development |
| **Browsing Data**: IP address, browsing activity, device/browser information. | Our marketing service providers  Our service providers (including cookies and analytics) | Provide, market and improve products and services  Research and development |
| **Location Data** | Our marketing service providers  Our service providers (including cookies and analytics)  Our support/maintenance service providers | Provide, market and improve products and services  Research and development  Security purposes |
| **Employment Data**: Job history, educational records/transcripts of employees/job applicants. | Our benefits and payroll service providers and partners | Employment, payroll, insurance and benefits, for background checks |
| **Inferences**: User profiles reflecting preferences, behaviors, usage trends on Website/Apps/Tools. | Our marketing service providers  Our service providers (including cookies and analytics) | Provide, market and improve products and services  Research and development |

## Sensitive Personal Data

As a part of the Website, the Apps and the Tools, we may collect and Share Sensitive personal data, as set forth above, and use it or Sell/Share it for the purposes described above.

You have the right to request that we limit our use and disclosure of your Sensitive personal data such that we each use such data solely to provide you the Website, the Apps and the Tools, or process your transactions. To exercise this right, please email your request to *[Your company’s email address for enquiries related to data privacy]*.

## Data Retention

We retain Personal Data to meet legal requirements and fulfill the purposes identified in this Policy. Data is retained only as long as necessary and in accordance with applicable laws. When no longer needed, data will be destroyed according to local law.

## How to Exercise Your CCPA/CPRA Rights

To exercise your CCPA/CPRA rights, contact us at *[Your company’s email address for enquiries related to data privacy]*.

*Verification*

*[Add your company’s preferred method of verification here if it includes any specific forms of verification not covered in the guideline text below]*

You must provide your associated email address, and an email for future communication. To request specific personal data, email a signed declaration under penalty of perjury that you are a California resident and the consumer whose data is requested to *[Your company’s email address for enquiries related to data privacy]*.

We will review your data and attempt to verify your identity. We may require additional data to confirm your identity and residency. You can make a personal data request twice in 12 months.

*How to Submit*

Email requests should include “California Privacy Rights” in the subject line. Telephone requests may need to be provided in writing for verification.

*Response*

We will acknowledge your request within 10 days and respond within 45 days or inform you if we need more time or data.

## Using an Authorized Agent

California residents can authorize an agent to submit data privacy requests to *[Your company’s email address for enquiries related to data privacy]*. To use an authorized agent, both the resident and the agent must verify their identities. The agent must submit a request with their email address, an email for future communication, and the consumer's email (if applicable) and an email for future communication. The agent must also provide written authorization from the consumer, unless they have provided a power of attorney. We may require direct confirmation from the consumer if we cannot authenticate the agent's identity.

EUROPEAN ADDENDUM TO PRIVACY POLICY

*[If your company operates outside Europe but collects or processes data from people in the EU, adding a European privacy addendum to your policy is crucial. The GDPR applies globally to businesses that offer goods or services to EU residents or monitor their online behavior. Noncompliance can lead to hefty fines—up to €20 million or 4% of annual revenue—and restrictions on data processing. Including this addendum ensures you meet GDPR requirements, protect your business from legal risks, and show your commitment to safeguarding user privacy, which builds trust and supports compliance with international standards.]*

This Addendum to the Policy applies to you only if accessing the Website, the Apps and the Tools from within the confines of the European Economic Area (“**EEA**”), Switzerland or the United Kingdom. **THIS ADDENDUM TO THE PRIVACY POLICY DOES NOT APPLY TO ANY PERSON LOCATED WITHIN THE UNITED STATES OF AMERICA OR ANY OF ITS TERRITORIES, OR ANY COUNTRY OUTSIDE THE EEA, SWITZERLAND OR THE UNITED KINGDOM.**

Additional data requirements pursuant to Art. 13 GDPR (EU General Data Protection Regulation):

This Policy addendum (the “**Privacy Policy European Addendum**”) applies solely to our and our service providers’ processing of the “personal data” (as such term is defined in the GDPR) of data subjects who are in the European Economic Area, where they use, browse or interact with, the Website, the Apps and the Tools.

It is important that you read this Privacy Policy European Addendum together with any other Policy, privacy notice or fair processing policy we and our service providers may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we and our service providers are using your data. This Privacy Policy European Addendum supplements other notices and privacy policies and is not intended to override them.

**Controllers**

*[Name of company who owns the website domain]*, is a controller of the Website, the Apps and the Tools.

Our service provider, *[List any other parties/service providers that are deemed controllers - otherwise delete this whole sentence]* is also a controller with respect to the Website, the Apps and the Tools.

## Data Privacy Manager

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy European Addendum. If you have any questions about this Privacy Policy European Addendum, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below:

Full name of legal entity: *[Name of company who owns the website domain]*

Email address: *[Your company’s email address for enquiries related to data privacy]*

## Changes To The Privacy Policy And Your Duty To Inform Us Of Changes

We keep the Policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## The Data We And Our Service Providers Collect About You

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

As we and our service providers provide the Website, the Apps and the Tools to you, engage in marketing activities, and make the Website, the Apps and the Tools available to you, we and our service providers may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* **Identity Data** includes first name; last name; education and employment data; financial account data, including wallet data, salary and income data; account access credentials; and government-issued identification numbers.
* **Contact Data** includes email address, mailing address, and phone number.
* **Technical Data** may include IP address; browsing history; records of clicks, views and downloads; records of invitations opened and shared; widget load data; device and browser data; interactions with the Website, the Apps and the Tools; times and dates of visits to the Website, the Apps and the Tools; and pages that you visit before and after the Website, the Apps and the Tools.
* **Usage Data** includes data about how you use the Website, the Apps and the Tools, and other inferences we and our service providers may draw from your personal data.
* **Marketing and Communications Data** includes your preferences in receiving marketing from us, and our service providers, and each of our third party vendors, and your communication preferences.
* **Commercial Data** includes records of transactions on the Website, the Apps and the Tools, and products or services obtained or considered; and other purchasing or consuming history or tendencies.
* **Special Data** includesgender, age, and citizenship.

We and our service providers do not collect other categories of Special Data (as defined in the GDPR) such as details about your religious or philosophical beliefs, sex life, political opinions, trade union membership, genetic and biometric data, or data about criminal convictions and offences of European residents.

Please note that when using the Website, the Apps and the Tools, you may have the option to access, use or download third-party content. If you make use of such features of the Website, the Apps and the Tools, you will be accessing content offered by our and our service providers’ third party vendors or third parties or are not affiliated with us or our service providers. We do not control what data they may collect from you to allow them to make their services available, such as Technical Data or Usage Data. This Privacy Policy European Addendum does not apply to collection or processing of your personal data by such parties.

We and our service providers may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we and our service providers may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of the Website, the Apps and the Tools, or we and our service providers may collection anonymous registration data to calculate the number of individual users accessing the Website, the Apps and the Tools. However, if we or our service providers 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 European Addendum.

## If You Fail To Provide Personal Data

Where we and our service providers 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 (for example, to provide you with the Website, the Apps and the Tools). In this case, we and our service providers may have to suspend your access to all or parts of the Website, the Apps and the Tools, as applicable, but we will endeavour to notify you if your access is suspended to such features.

## How Is Your Personal Data Collected?

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

* **Direct interactions.** You may give us and our service providers your Identity, Contact Data, Commercial Data, and Special Data by registering for an account, as part of the employment process, requesting or obtaining access to the Website, the Apps and the Tools, or by corresponding with us or our service providers through any means.
* **Automated technologies or interactions.** For a description of cookies and other Tracking Technologies used on the Website, the Apps and the Tools, please visit the *[url of your* ***Cookie Policy****]*.
* **Third parties or publicly available sources.** We and our service providers receive personal data about you from various third parties and public sources as set out below:
  + Identity Data from your publicly available wallet data if you share this with us.
  + Contact Data, Identity Data, Technical Data, Usage Data, Commercial Data, and Marketing and Communications Data from our and our service providers’ vendors.
  + Technical Data and Usage Data when you choose to use or access third-party websites and services linked or otherwise made available on or through the Website, the Apps and the Tools.
  + Identity Data, Contact Data, Technical Data, Usage Data, Marketing and Communications Data, and Commercial Data as we and our service providers engage in marketing activities.
  + Identity Data, Contact Data, Technical Data, Usage Data, Marketing and Communications Data, Commercial Data, and Special Data as we and our service providers make available the Website, the Apps and the Tools to you, and provide you with products and services relating to the same.

## How We And Our Service Providers Use Your Personal Data

We will only use your personal data that we collect when the law allows us to. Most commonly, we and our service providers will use your personal data in the following circumstances:

Where we and our service providers make available the Website, the Apps and the Tools to you, and provide you with products and services relating to the same.

Where it is necessary for our and our service providers’ legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we and our service providers need to comply with a legal obligation.

Generally, we and our service providers do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us or through the “unsubscribe” feature in any marketing communication we or our service providers may send you.

## Purposes For Which We And Our Service Providers Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we, and our service providers on our behalf, plan to use your personal data that we each collect through any of the foregoing means, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we and our service providers may process your personal data for more than one lawful ground depending on the specific purpose for which we and our service providers are using your data. Please contact us 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** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| --- | --- | --- |
| To provide the Website, Apps, and Tools | Identity  Contact  Technical  Usage  Marketing and Communications  Commercial Data | * Contract performance. * Legal compliance. * Legitimate interests (record-keeping and user behavior analysis). |
| To manage our relationship with you, including:   * Notifying you about changes * Enabling you to interact with us and our vendors * Responding to your requests * Updating your personal data | Identity  Contact  Marketing and Communications  Commercial | * Contract performance * Legal compliance * Legitimate interests (record-keeping and user behavior analysis) |
| To run and protect our business, website, apps, and tools. | Identity  Contact  Technical | * For legitimate business purposes * To comply with legal obligations |
| To provide relevant services and ads, and measure their effectiveness. | Identity  Contact  Usage  Marketing and Communications  Technical  Commercial | Needed to study user activity, improve products, grow business, and inform marketing. |
| To use data analytics to improve our products, services, marketing, customer relationships, user experience, and identify potential users. | Technical  Usage  Marketing and Communications  Commercial | Needed for business growth, improvement, and marketing. |
| To recommend products or services that may interest you. | Identity  Contact  Technical  Usage  Commercial  Marketing and Communications | Needed to improve our products/services and grow our business. |
| To offer employment, administer benefits, manage payroll, and track employee activity. | Identity  Contact  Technical  Special  Usage | Necessary for:   * Legitimate business interests * Legal compliance |

## 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:

### Promotional offers from us and our service providers

We and our service providers may use your Identity, Contact, Technical, Commercial, and Usage Data to form a view on what we and our service providers think you may want or need, or what may be of interest to you (which we each may use for marketing purposes and may share with our respective third-party vendors). You will receive marketing communications from us and our service providers if you have requested data from either of us or purchased services from either of us, and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before sharing your personal data with any third party for their own marketing purposes.

### Opting out

You can ask to stop receiving marketing messages at any time by following the opt-out links on any marketing message sent to you by us or by our service providers on our behalf. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us and our service providers as a result of a service purchase or other transactions.

### Cookies on the Website, the Apps and the Tools

For a description of cookies and other Tracking Technologies used on the Website, the Apps and the Tools, please visit the *[url of your* ***Cookie Policy]*** Note that you may not be able to refuse all data collection even by setting your browser cookies settings, and that some collection of technical and usage data may continue.

Also, note that we and our service providers use the following analytics service providers, who also collect technical and usage data based on your use of the Website, the Apps and the Tools. The analytics providers listed below are independent controllers of that data, and use it for their own purposes. You specifically grant your consent to such data collection and usage.

| **Service Provider** | **Link to Privacy Policy** | **Services provided** |
| --- | --- | --- |
| *[Add names of third-party service provider]* | *[privacy policy url]* | *[describe services provided, for example: collection, organization, and transmission of data to our systems, data warehousing, Data analytics, monitoring, technical administration and functionality, and user authentication]* |

## Change Of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider its usage necessary for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please submit a request to *[Your company’s email address for enquiries related to data privacy]*.

If we or our service providers need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis permitting such use.

Please note that we and our service providers may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Disclosures Of Your Personal Data

We and our service providers may share your personal data for the purposes of providing services to you, engaging in marketing activities, and making the Website, the Apps and the Tools available to you, including the following:

* Internal Third Parties as set out in the Glossary.
* External Third Parties as set out in the Glossary.

Third parties to whom we and our service providers may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we or our service providers may seek to acquire other businesses or merge with them. If a change happens to our or our service providers’ business, then the new owners may use your personal data according to their own privacy practices.

We contract with third-party vendors to require that they do not use your personal data for their own purposes and to authorize them to process your personal data for specified purposes and in accordance with our instructions.

## International Transfers

Whenever we transfer your personal data out of the European Economic Area (“**EEA**”), Switzerland and the United Kingdom we will endeavour to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We or our service providers will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\_en.

Where we or our service providers use certain vendors, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\_en.

Please contact us if you want further data on the specific mechanism used when transferring your personal data outside your jurisdiction.

## Data Security

We have in place security measures intended to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

## Data Retention

We have implemented measures intended to ensure that we will not retain your personal data longer than is necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Note, however, that if we or our service providers have a legitimate interest in retaining the data, or if we are required to do so by applicable law, we will retain the data in accordance with our respective data retention plans and policies.

In some circumstances we and our service providers may choose to anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we and our service providers may use this data indefinitely without further notice to you.

## Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may: (1) request access to your personal data; (2) request correction of your personal data; (3) request erasure of your personal data; (4) object to processing of your personal data; (5) request restriction of processing your personal data; (6) request transfer of your personal data; or (7) right to withdraw consent by contacting *[Your company’s email address for enquiries related to data privacy]*

## 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 could refuse to comply with your request in these circumstances.

## What We And Our Service Providers May Need From You *[Add your company’s preferred method of verification here if it includes any specific forms of verification not covered in the guideline text below]*

We and our service providers may need to request specific data from you to help confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights), including your: associated email address (if applicable), and an email to be used for future communication. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We and our service providers may also contact you to ask you for further data in relation to your request to speed up our response.

## Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it could take longer than a month if your request is particularly complex or you have made a number of requests. In this case, we or our service providers will notify you and keep you updated.

## Glossary

**Legitimate Interest** means the interest of our business in conducting and managing the business and enabling us and our service providers to give you the best service/product and the best and most secure experience that we can offer. We make sure to consider and balance any potential impact on you (both positive and negative) and your rights before processing your personal data for such legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we or our service providers have your consent or are otherwise required or permitted to by law). You can obtain further data about how we assess such legitimate interests against any potential impact on you in respect of specific activities by submitting a request to *[Your company’s email address for enquiries related to data privacy]*.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we or our service providers are subject to.

**THIRD PARTIES**

**Internal Third Parties** means affiliates of *[The Company that owns and operates the website]*

**External Third Parties** means service providers acting as processors. A list of such parties is available upon reasonable request.

Third-party service providers which collect data as set forth in this policy and are each an independent controller of such data, including:

*[List your company website’s third party service providers*]

Regulators and other authorities acting as processors or joint controllers based in the United States who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we and our service providers may need to verify the accuracy of the new data you provide.

**Request erasure** of your personal data. This enables you to request deletion or removal of 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 data unlawfully or where are required to erase your personal data to comply with local law. Note, however, that we and our service providers may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to 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 compelling legitimate grounds for our and our service providers’ processing of your data which override your rights and freedoms.

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

* If you want us to establish the data's accuracy.
* Where our use of the data is unlawful but you do not want to erase it.
* 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.

You have objected to our use of your data but such data is necessary to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We or 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 data which you initially provided consent for us or our service providers to use or where we used the data to perform a contract with you.

**Withdraw consent** at any time 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 and our service providers 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.