

# Thirdweb Privacy Policy

Effective: May 3, 2022

This Privacy Policy (“**Policy**”) describes how thirdweb, created by Non-Fungible Labs, Inc., (collectively, “**thirdweb**”, “**we**,” “**our**,” “**us**”) collects, uses, and discloses certain personal information obtained when you access, use or download our software development kits (“**SDKs**”), web-based development tools and downloadable software (collectively, the “**Software**”), visit our website (the “**Site**”), apply for our gas grants, or when you communicate with us in connection with our services. By accessing, using or downloading our Software, visiting our Site and/or using the features made available to you on the Site (the “**Services**”), you are agreeing to the terms of this Policy. If you provide the personal information of another individual, it means that you have informed him/her of the purpose for which we require his/her personal information and he/she has consented to the collection, use and disclosure of his/her personal data in accordance with this Policy.

## Information We Collect

We collect personal information directly from you when you use our Services, including when you access, use or download our Software, visit our Site, apply for gas grants or provide us with feedback. We automatically collect certain information about you and your computer, smartphone, or other such device when you use, access, download or interact with our Services. We may also collect information about you from other third parties, such as social media companies.

***Our developer community.*** We may collect the following categories of personal information when you directly provide it to us through our Services:

- Technical information, such as your cryptocurrency wallet address. We will never ask you to share your private keys or wallet seed;
- Contact information such as your email address;
- Profile information such as your social media username; and
- Device information such as your browser, device, originating URL and referring domain.

***Gas grant applicants.*** If you apply to our gas grant promotional program, we may collect additional personal information that you provide to us, including:

- Identity information such as your name;
- Contact information such as your email address and phone number;
- Profile information such as your Twitter handle;
- Employment information such as your role and team size and your company name and website; and
- Transaction information such as your past wallet history.

***Other personal information collected through use of the Services.*** We collect information automatically when you use the Services, including when you browse our Site. To the extent you use certain features of the Site, such as the “Feedback” feature, we will collect the personal information that you provide us, which may include your email address or social media username.

***Job applicants.*** When you submit a job application, we will collect your personal information. The categories of information we may collect include your full name, email address, phone number, resume, current and previous work history, and other information about you personally and your employment history.

***Server logs.*** Server logs automatically record information and details about your online interactions with us. For example, server logs may record information about your visit to our Site on a particular time and day and collect information such as your device ID and IP address.

***Cookies.*** We also use cookies on the Services. Cookies are small files that are stored on your device through the Site. A cookie allows the Services to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of the Services during your current session and over time (including the pages you view and the files you download), your mobile device’s operating system, your IP address, and your general geographic location.

***Pixel tags.*** A pixel tag (also known as a web beacon, clear graphics interchange format (GIF), pixel, or tag) is an image or a small string of code that may be placed in an advertisement or email. It allows companies to set or read cookies or transfer information to their servers when you load a webpage or interact with online content. For example, our service providers may use pixel tags to determine whether you have interacted with a specific part of our Site.

***Third-party plugins.*** Our Services may include plugins from other companies, including social media companies. These plugins may collect information, such as information about the pages you visit, and share it with the company that created the plugin even if you do not click on the plugin. These third-party plugins are governed by the privacy policies and terms of the companies that created them.

***Third-party online tracking.*** We also may partner with certain third parties to collect, analyze, and use some of the personal and other information described in this section. For example, we may allow third parties to set pixels and mobile advertising IDs through the Site. This information may be used for a variety of purposes, including Site analytics, as discussed below (see the section entitled “With Whom and Why We Share Your Information”).

***Aggregated and deidentified information.*** From time to time, we may also aggregate or de-identify information about your use of our Services, such as the pages you visit or your transactions, and share that information with third parties. Such aggregated information will not identify you personally.

## **How We Use and Process Your Information**

The primary purpose for which we collect information is to provide you with our Services so that by use of our Software, you can create applications and tokens (“**Code**”). Other purposes for which we use your information include to:

- Respond to your inquiries and provide you with technical support;
- Evaluate your gas grant applications and your Code;

- Communicate with you through our social media plugins or our Site;
- Improve our Services, optimize our platform and your user experience;
- Advertise, merchandise and publicize your gas grant with our community;
- Evaluate employment applications and contact you regarding potential employment;
- Comply with legal and/or regulatory requirements; and
- Manage our business.

### **With Whom and Why We Share Your Information**

We share your information with other parties for a variety of purposes related to the operation of our business, as described below.

***Third-party service providers.*** Thirdweb also uses third-party service providers that perform Services on our behalf, including, web-hosting companies, IT infrastructure and support, customer communication, marketing, and other similar services. These service providers may collect and/or use your information, including information that identifies you personally, to assist us in achieving the purposes discussed above. Our service providers are not allowed to use information about our donors for their own purposes and are contractually obligated to maintain confidentiality.

***Analytics.*** We partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use server logs or pixel tags, and they may set and access cookies on your computer or other device.

***Legal purposes.*** We also may use or share your information with third parties, including government agencies or other regulatory bodies and law enforcement officials, when we believe, in our sole discretion, that doing so is necessary:

- To comply with applicable law, a court order, subpoena, or other legal process or otherwise cooperate with appropriate law enforcement or regulatory investigations;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party;
- To establish, protect, or exercise our legal rights or defend against legal claims; or
- To facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.

### **Your Choices**

If you want to learn more about the personal information that thirdweb has about you, or you would like to update, change, or delete that information, please contact us by email at [privacy@thirdweb.com](mailto:privacy@thirdweb.com). We will respond to your request as soon as reasonably possible and no longer than what is permitted under applicable law.

### **External Links**

The Site may contain links to third-party websites or services. If you use these links, you will leave the Site. We have not reviewed these third-party sites and do not control and are not responsible for any of these sites, their content, or their privacy policy. Thus, we do not endorse or make any representations about them, or any information, software, or other products or materials found there, or any results that may be obtained from using them. If you decide to access any of the third-party sites listed on our Site, you do so at your own risk.

### **Data Security**

We employ physical, technical, and administrative procedures to safeguard the personal information we collect online. However, no website is 100% secure, and we cannot ensure or warrant the security of any information you transmit to the Services or to us. You transmit such information at your own risk.

### **Data Retention**

We retain personal information about you necessary to fulfill the purpose for which that information was collected, as specifically limited by the policies outlined above, or as required or permitted by law. We do not retain personal information longer than is necessary for us to achieve the purposes for which we collected it. When we destroy your personal information, we do so in a way that prevents that information from being restored or reconstructed.

### **International Transfers**

The information that we collect through or in connection with the Site is transferred to and processed in the United States for the purposes described above. We may also subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data-protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Services or by providing any personal or other information to us, you expressly consent to such transfer and processing.

### **Children**

Our services are directed at individuals over the age of 13 and is not directed at children under the age of 13. We do not knowingly collect personally identifiable information from children under the age of 13.

### **Updates to this Policy**

Thirdweb reserves the right to modify its Policy at any time, for any reason. Thirdweb will post all such changes on the Site. We encourage you to review this page periodically to review the current Policy in effect.

### **How to Contact Us**

Should you have any questions or concerns about this Policy, you can contact us by, sending us at [privacy@thirdweb.com](mailto:privacy@thirdweb.com) or at:

Non-Fungible Labs, Inc.  
2 Marina Blvd, B300N,  
San Francisco, CA 94123