

IRL Privacy Policy

Last Updated: May 2023

This Privacy Policy is designed to help you understand how Integral Reality Labs, Inc. (“**IRL**,” “**we**,” “**us**,” or “**our**”) collects, uses, and shares your personal information, and to help you understand and exercise your privacy rights.

Notice at Collection. At or before the time of collection, California residents may have a right to receive Policy of our practices, including the categories of personal information to be collected, the purposes for which such information is collected or used, whether such information is sold or shared and how to opt-out of such uses, and how long such information is retained. You can find those details in this statement by clicking on the above links.

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY
2. PERSONAL INFORMATION WE COLLECT
3. HOW WE USE YOUR PERSONAL INFORMATION
4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION
5. YOUR PRIVACY CHOICES AND RIGHTS
6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION
7. RETENTION OF PERSONAL INFORMATION
8. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS
9. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS
10. CHILDREN’S INFORMATION
11. OTHER PROVISIONS
12. CONTACT US

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our websites, mobile application, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile application, and other offerings are collectively called the “**Services**.”

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Information.** We may collect personal information in connection with the creation or administration of your account including, but not limited to, your name, email address, address, phone number, and cryptocurrency wallet address.
- **Purchases.** We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services with credit or debit cards are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).

- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about IRL or our Services, register for our newsletter, request support, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, your buying and selling activity in connection with our Services, your search history on our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited, a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.

See "[Your Privacy Choices and Rights](#)" below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services.

C. Personal Information Collected from Other Sources

Third-Party Services and Sources. We may obtain personal information about you from third-party sources.

For example, certain features and functionalities of the Services may link to or allow you to interface, interact, or share information with, access and/or use third-party websites, services, products, and technology (collectively, "**Third-Party Services**").

If you access or use our Services through, or in connection with, a Third-Party Service, we may collect personal information about you from that Third-Party Service. One example of this sharing could be where you purchase a digital collectible (each a "**Collectible**") via a Third-Party Service and then try to pair that Collectible with a physical item provided by us. In this scenario, the Third-Party Service may share personal information with us in order to facilitate your use of our Services in connection with your Collectible.

Referrals and Sharing Features. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your personal information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;

- Processing your financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your personal information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we may market to you include email campaigns, text messages, custom audiences advertising, and “personalized advertising” or “targeted advertising,” including through cross-device tracking.

If you have any questions about our marketing practices, you may contact us at any time as set forth in “[Contact Us](#)” below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **Automated Decision Making.** We may engage in automated decision making, including profiling. IRL’s processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in “[Contact Us](#)” below.
- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about how you use the Services, information about the device from which you access our Services, or other analyses we create. De-identified and/or aggregated information is not personal information, and we may use, disclose, and retain

such information as permitted by applicable laws including, but not limited to, for research, analysis, analytics, and any other legally permissible purposes.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Notice Regarding Use of Blockchain Networks.** The Services may allow you to enter into transactions that are recorded on a blockchain network. Information about transactions you enter into that are recorded on a blockchain network may be accessible to third parties due to the public nature of the blockchain. Because entries to a blockchain network are, by their nature, public, and because it may be possible for someone to identify you through your pseudonymous, public wallet address using external sources of information, any transaction you enter onto a blockchain network could possibly be used to identify you, or information about you.
- **Other Third Parties You Share or Interact With.** Our Services may allow you to share personal information or interact with other third parties (including other users and/or Third-Party Services).

Any information shared with or otherwise collected by a Third-Party Service may be subject to the Third-Party Service's privacy policy. We are not responsible for the processing of personal information by other users or Third-Party Services.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising", "personalized advertising", or "targeted advertising."

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).
- **Text Messages.** If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in "[Contact Us](#)" below.
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.
- **"Do Not Track."** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Personalized Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Confirm Whether We Are Processing Your Personal Information** (the right to know);
- **Access to and Portability of Your Personal Information**, including: (i) obtaining access to or a copy of your personal information; and (ii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the "right of data portability");
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;

- **Request Deletion** of your personal information;
- **Request to Opt-Out of Certain Processing Activities** including, as applicable, if we process your personal information for “targeted advertising” (as “targeted advertising” is defined by applicable privacy laws), if we “sell” your personal information (as “sell” is defined by applicable privacy laws), or if we engage in “profiling” in furtherance of certain “decisions that produce legal or similarly significant effects” concerning you (as such terms are defined by applicable privacy laws);
- **Request Restriction of or Object to** our processing of your personal information;
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal; and
- **Appeal our Decision** to decline to process your request.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

If applicable laws grant you an appeal right and you would like to appeal our decision with respect to your request, you may do so by informing us of this and providing us with information supporting your appeal.

6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

7. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period for personal information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

8. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental Notice for California Residents supplements our Privacy Policy and only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (as amended from time to time) (“CCPA”).

The CCPA provides California residents with the right to know what categories of personal information IRL has collected about them and whether IRL disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

Category of Personal Information Collected by IRL	Category of Third Parties To Whom Personal Information is Disclosed to for a Business Purpose
Identifiers	<ul style="list-style-type: none"> • Blockchain networks • Service providers • Other third parties you share or interact with
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Blockchain networks • Service providers • Other third parties you share or interact with
Protected classification characteristics under California or federal law	N/A
Commercial information	<ul style="list-style-type: none"> • Blockchain networks • Service providers • Other third parties you share or interact with
Biometric information	N/A
Internet or other electronic network activity	<ul style="list-style-type: none"> • Blockchain networks • Service providers
Geolocation data	N/A
Sensory data	<ul style="list-style-type: none"> • Service providers • Other third parties you share or interact with
Professional or employment-related information	<ul style="list-style-type: none"> • Service providers • Other third parties you share or interact with
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99))	N/A
Inferences drawn from other personal information to create a profile about a consumer	N/A
Personal information that reveals a consumer’s social security, driver’s license, state identification card, or passport number	N/A
Personal information that reveals a consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> • Service providers
Personal information that reveals a consumer’s precise geolocation	N/A
Personal information that reveals a consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership	N/A
Personal information that reveals the contents of a consumer’s mail, email, and text messages unless IRL is the intended recipient of the communication	N/A
Personal information that reveals consumer’s genetic data	N/A
Biometric information that is processed for the purpose of uniquely identifying a consumer	N/A
Personal information collected and analyzed concerning a consumer’s health	N/A

Category of Personal Information Collected by IRL	Category of Third Parties To Whom Personal Information is Disclosed to for a Business Purpose
Personal information collected and analyzed concerning a consumer's sex life or sexual orientation	N/A

The categories of sources from which we collect personal information and our business and commercial purposes for using and disclosing personal information are set forth in “Personal Information We Collect”, “How We Use Your Personal Information”, and “How We Disclose Your Personal Information” above, respectively. We will retain personal information in accordance with the time periods set forth in “Retention of Personal Information.”

Additional Privacy Rights for California Residents

Disclosure Regarding “Sales” of Personal Information under the CCPA. In the preceding twelve months, IRL has not “sold” any personal information (as defined by the CCPA), nor does IRL have actual knowledge of any “sale” of personal information of minors under 16 years of age.

Disclosure Regarding Cross-Context Behavioral Advertising under the CCPA. In the preceding twelve months, IRL has not “shared” any personal information for “cross-context behavioral advertising” (as such terms are defined in the CCPA), nor does IRL have actual knowledge of any “sharing” of personal information of minors under 16 years of age for “cross-context behavioral advertising”.

Disclosure Regarding Opt-Out Preference Signals. IRL does not “sell” personal information or “share” personal information for “cross-context behavioral advertising” so it does not respond to opt-out preference signals.

Disclosure Regarding Sensitive Personal Information. IRL only uses and discloses [sensitive personal information](#) for the following purposes:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at IRL and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by IRL, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by IRL.
- For purposes that do not infer characteristics about individuals.

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Verification. To protect your privacy, we will take steps to reasonably verify your identity before fulfilling requests submitted under the CCPA. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Examples of our verification process may include [IRL to insert. E.g., “...asking you to provide the email address or phone number we have associated with you, opening a link sent to the contact information provided, and following the instructions on the website you are taken to.”]

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To authorize an agent, provide written authorization signed by you and your designated agent using the information found in “[Contact Us](#)” below and ask us for additional instructions.

9. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in “[Contact Us](#)” below.

10. CHILDREN’S INFORMATION

The Services are not directed to children under 16 (or other age as required by local law outside of the United States), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in “[Contact Us](#)” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account, if applicable.

11. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If your personal information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your personal information violates applicable law.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner’s Office \(ICO\)](#)

12. CONTACT US

IRL is the controller of the personal information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

Integral Reality Labs, Inc.
legal@integralrealitylabs.com