

SAPIEN PRIVACY NOTICE

At Sapien, we are committed to protecting your privacy and ensuring that your data is handled securely. This Privacy Notice explains how we collect, use, and share your information, and how you can control your data.

Information We Collect

We collect information from you when you use our services, including:

- Personal Information:** Name, email address, phone number, and other contact details.
- Usage Data:** Information about how you interact with our services, including IP addresses, browser types, and device information.
- Payment Information:** Credit card details and other payment-related information.

How We Use Your Information

We use your information to provide, improve, and maintain our services. This includes:

- Service Delivery:** Providing the core functionality of our services.
- Personalization:** Tailoring our services to your preferences and needs.
- Security:** Protecting our services and your data from unauthorized access.
- Marketing:** Sending you promotional emails and other marketing materials, if you have opted in.

Sharing Your Information

We may share your information with third parties in the following circumstances:

- Service Providers:** Companies that help us operate our services, such as hosting providers and payment processors.
- Legal Requirements:** When required by law or government authorities.
- Business Transfers:** In the event of a merger, acquisition, or sale of our company.

Your Rights

You have the right to:

- Access:** View the personal information we hold about you.
- Correction:** Update or correct inaccurate information.
- Deletion:** Request the deletion of your personal information.
- Opt-Out:** Stop receiving marketing emails or other communications.

Contact Us

If you have any questions or concerns about this Privacy Notice, please contact us at privacy@sapien.com.

PRIVACY NOTICE

At Sapien, we are committed to protecting your personal data and privacy. Please read this privacy notice carefully to understand what personal data we collect about you, how we use it, who we share it with, and what privacy choices you have.

Last updated: Jan 21, 2025

This Privacy Notice (“Notice”) describes how Sapien AI Corp., together with its affiliates, (“Sapien,” “we,” “us,” or the “Company”), collects, uses, shares, and protects Personal Data in connection with your use of the Sapien protocol, related websites, applications, products, and services (the “Services”).

When we refer to “Personal Data” in this Notice, we mean any information relating to an identified or identifiable individual. This includes, for example, names or personal identifiers such as your name and your IP address.

By accessing or using the Services, you acknowledge and agree to the processing of your Personal Data as set out in this Notice.

1.0 Personal Data We Collect

When you register or otherwise engage with the Services, including participation in data submission, data labeling activities, staking, reputation, or rewards mechanisms, you may be required to provide, or Sapien may otherwise collect, certain Personal Data. Such Personal Data includes identifiers, financial information, and blockchain-related data generated through your use of the Services. The categories of Personal Data that may be collected include, without limitation:

Category of Personal Data	Examples of Personal Data Collected	Categories of Sources of Personal Data
Personal Identifiers	Name, Date of Birth, National Identification Number, IP Address	Directly from you when you register or use Services; automatically via cookies and tracking technologies
Contact Information	Email Address, Home Address, Billing Address, Phone Number	Directly from you during registration or participation
Account Information	User Name, Password, Activities, Completed Tasks	Directly from you upon account creation; derived from task participation
Sensitive Personal Data	Racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data, health data, or sex life/sexual orientation	Directly from you, only where strictly required for a specific project and subject to explicit consent
Professional Information	Employment history, positions held, work history, resume, earnings	Directly from you during onboarding or participation
Work-Related Information	Details of submissions and labeling tasks completed, performance metrics, challenge participation	Directly from you or derived from your task performance
Financial & Payment Information	Bank Account, Digital Wallet address for reward distribution	Directly from you during setup for reward payment
Internet or Network Activity	Device and app identifiers, browsing history, usage data, browser/OS information, referring URL, search terms, content viewed, visit duration	Cookies and tracking technologies; interactions with Services

Interactions with Sapien	Communications with Sapien staff, email correspondence, feedback, interactions via social media	Directly from you during interactions
User-Generated Content	Community posts, feedback, photographs, work samples, skills, test results, pay rates, and earnings	Directly from you or derived from participation
Blockchain Identifiers	Public wallet addresses, transaction hashes, smart contract interactions, staking records, validator approvals, referral attributions	Directly from you when linking a wallet; generated automatically on-chain
On-Chain Transaction Metadata	Timestamps, block numbers, gas fees, token allocations, protocol events (slashing, reputation adjustments, multipliers)	Automatically collected from blockchain and protocol contracts
Tokenomics Participation Data	Token lock-ups, vesting schedules, reward splits, staking and slashing events, early withdrawal penalties	Generated automatically during protocol use
Reputation and Validation Data	Reputation scores, validator approvals/rejections, contribution level (Trainee, Contributor, Expert, Master), history of validations received or issued	Generated by Sapien's systems and protocol records
Compliance and Risk Data	Wallet blacklisting status, sanctions screening results, other applicable compliance checks.	From Sapien compliance checks; from third-party providers

2.0 Cookies

Subject to your consent, we will use so-called “cookies” to offer you a comprehensive range of functions and to make using our website more convenient. Cookies are small files that are stored on your device with the help of your internet browser. You can consent to the use of cookies, learn more about the cookies we use and their purposes, and manage your preferences through the cookie declaration on our website.

3.0 Purposes of Processing and Lawful Bases

We process Personal Data for the purposes below under the indicated lawful bases. “Contract performance” refers to processing necessary to perform the agreement with you (e.g., to administer tasks and rewards). “Legitimate interests” reflects our interest in operating, securing, and improving the protocol in a manner that does not override your rights and freedoms. “Consent” applies where required by law (e.g., cookies; specific sensitive data). “Legal obligation” applies where we must comply with laws (e.g., sanctions, tax, accounting).

Purpose of Processing	What This Involves	Lawful Basis for Processing
Register and manage your account	Create/maintain credentials, track account status, route access to task tiers	Contract performance
Administer participation in tasks	Match tasks to skills and history; enforce task instructions and SLAs	Contract performance; Legitimate interests (operate protocol efficiently)
Evaluate submissions & peer validation	Record quality/accuracy; process validator decisions; re-qualification; resolve discrepancies	Contract performance; Legitimate interests (ensure data quality)
Compute and maintain reputation	Calculate/adjust reputation score and tier from accuracy, validation outcomes, task volume	Legitimate interests (quality enforcement and fair progression)

Operate staking	Record stake amount/lock period; apply multipliers; process early withdrawal penalties; record slashing	Contract performance; Legitimate interests (accountability and anti-abuse)
Distribute rewards	Calculate rewards (including multipliers), prepare payouts in \$USDC and/or \$SAPIEN, configure payout ratios, execute on-chain claims	Contract performance; Legal obligation (tax/accounting records)
Security, abuse-prevention & integrity	Detect bots/collusion; enforce geo-restrictions/sanctions controls; prevent fraud	Legitimate interests (security); Legal obligation (sanctions where applicable)
Compliance with laws	Tax, accounting, audits; sanctions screening where applicable; responding to lawful requests	Legal obligation
Operate the blockchain components	Publish/record wallet address, staking, slashing, and reward transactions on public ledgers	Contract performance; Legitimate interests (transparent operation of protocol)
Communications related to services	Service notices, task/reward notifications, policy updates	Contract performance; Legitimate interests (service communication)
Analytics & service improvement	Performance analytics, protocol tuning, validator calibration, queue optimization	Legitimate interests (improve Services)
Sensitive data for specific projects <i>(only where explicitly required)</i>	Collect/process sensitive data only when a project requires it and with your explicit consent	Consent (explicit); Contract performance (if applicable)



Note (blockchain transparency). Where staking/reward events are written to a public blockchain, related records (e.g., digital wallet address, transaction hashes, stake/claim events) may be public and immutable. Once published on-chain, removal or alteration may not be technically possible.

4.0 Marketing

We may use your name, email address, IP address, and browsing history to send or show you updates on the latest news, offers, and promotions related to our products and services or to tailor and track your interactions with our ads on third-party websites.

We will provide you with an option to unsubscribe or opt out of future direct marketing communications. You may also opt out by contacting us as set out in Section 9 below.

5.0 Information Sharing and Disclosure

We do not sell Personal Data. We disclose it only as described below and only to the extent necessary for the stated purposes.

Category(ies) of Personal Data	Recipient / Category of Recipient	Purpose of Disclosure (incl. reputation/staking/rewards/blockchain)
All categories listed in §1	Sapien affiliates	Steward protocol operations; issue \$SAPIEN; administer staking, slashing, and reward distribution; compliance and audit support

Work & Performance Information; Protocol Metrics (Reputation, Staking & Rewards); Account Information (pseudonymous)	Protocol participants (Validators)	Enable peer validation; display limited metadata (e.g., reputation tier, task context) needed to review work; prevent collusion; maintain quality
Public blockchain records: wallet address, transaction hashes; staking/claim/slashing events; reward distributions	Public blockchain/network participants (nodes, indexers, explorers, downstream integrators)	Execute staking and reward transactions; provide transparent, auditable protocol operation (records may be public/immutable)
All categories in §1 (as needed)	Service providers/processors (hosting, cloud, analytics, security/fraud, payments, communications, identity verification where required)	Host and operate platform; run analytics/security; process payouts (\$USDC/\$SAPIEN); conduct identity/sanctions/AML checks where legally required
Work outputs: performance summaries (pseudonymous where feasible)	Clients/partners tied to specific projects	Deliver project outputs; demonstrate quality controls; assess contributor eligibility— <i>only where required by the project and disclosed in project terms</i>
Cookies/telemetry (limited to what is configured)	Analytics and security vendors	Site reliability, abuse detection, performance measurement
All categories (as applicable)	Government, regulators, courts, law enforcement	Respond to lawful requests; comply with legal obligations (tax, sanctions/AML, consumer protection, data protection)
All categories (as applicable)	Professional advisors and insurers (law firms, auditors, consultants, insurers)	Obtain legal, audit, insurance, compliance, and advisory services

All categories (as applicable)	Prospective buyers/investors and their advisors	Corporate transaction diligence (merger, acquisition, financing); subject to confidentiality controls
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Additional disclosures relevant to the use of blockchain: When you select an on-chain payout or stake, the digital wallet address you provide will receive transactions that are publicly visible on the relevant blockchain, and third parties may correlate those records with your activity on the platform. You should consider your pseudonymity model and wallet hygiene accordingly.

6.0 International Transfers of Personal Data

As an organization with a global workforce, we collect, transfer, store, and process your personal data in different jurisdictions, including Canada, the European Economic Area, and the United States.

Therefore, your personal data, as specified in Section 2 of this privacy notice, may be processed outside of your jurisdiction in countries and jurisdictions that are not deemed as providing an adequate or equivalent level of personal data protection by your local legislator or data protection supervisory authority. Nonetheless, we are committed to applying and maintaining the appropriate safeguards as required by your applicable data protection law to ensure the legality of such cross-border processing of personal data.

Certain data submission and data labeling activities may include the sharing of your personal data and submissions to our clients that are based outside of your jurisdiction, in countries and jurisdictions that are not deemed as providing an adequate or equivalent level of personal data protection by your local legislator or data protection supervisory authority. Where permitted to do so under the applicable data protection laws and regulations, such transfer shall take place as necessary for the performance of a contract between you and Sapien. You will always be notified in advance when you sign up for data submission and data labeling activities involving such transfer.

If you would like to get more information on the countries where we process personal data or obtain a copy of the appropriate safeguards in place, please reach out to us at privacy@sapien.io.

7.0 Data Handling Practices

7.1 Security of processing

We implement reasonable security measures to protect your personal information from unauthorized access, alteration, disclosure, or destruction. However, no method of transmission over the Internet or electronic storage is 100% secure.

7.2 Retention period

We will retain your personal data for as long as necessary to achieve the purposes for which it was collected. We will also retain some of the personal data you share with us for other permitted purposes, such as to meet certain statutory requirements or for the establishment, exercise, or defense of legal claims.

Our retention periods are based on business needs, and when your personal data is no longer needed, it is either irreversibly anonymized or securely destroyed.

If you would like to obtain more information on the retention periods applicable to your personal data, please reach out to us at privacy@sapien.com

8.0 Your Privacy Rights

8.1 Right of Access

You can ask Sapien to confirm whether or not we process your personal data and request a copy of that personal data.

Pursuant to the California Shine the Light Law, if you are a California resident, you can ask us for information about the third parties with whom we have shared your personal data for their marketing use.

8.2 Right to Rectification

You can ask us to amend or correct any outdated or inaccurate personal data we hold about you.

8.3 Other privacy rights

The data protection laws applicable to your personal data may provide for additional privacy rights, as listed below. Please be aware that certain exceptions apply to the exercise of these rights, and you will not be able to exercise them in all situations.

8.3.1 Right to erasure

In certain circumstances, you can ask us to delete or anonymize the personal data we hold about you. We will take reasonable steps to inform other controllers who are processing the data that you have requested to erase any links to, copies of, or replications of it.

8.3.2 Right to withdraw consent

You can withdraw any consent to processing that you have given us and prevent further processing of your personal data if there is no other ground under which Sapien can use to justify the processing of your personal data.

8.3.3 Right to restrict the processing

In certain circumstances, for example, when you ask us to correct your personal data, you can ask us to cease processing it with the exception of storage.

8.3.4 Right to object or opt-out of processing

In certain circumstances, for example, when we process your personal data in our legitimate interests, you can object or opt-out of such processing. Following your objection, we shall no longer process your personal data unless we can demonstrate compelling reasons to continue the processing.

You can always opt-out of the processing of your personal data for marketing purposes, including profiling, and we will stop such processing.

The right to object or opt-out of processing extends to your right to opt-out of the sale or sharing of personal information as set out in the US privacy laws applicable to your personal data.

We do not make any decisions about you based only on automated processing (with no human interaction), which produce legal effects or significantly affect you.

8.3.5 Right to data portability

You can ask us to transmit the personal data, that we have collected from you based on your consent or to execute our contract with you, to another organization electronically in a machine-readable format.

9.0 Contacting us

If you have any questions about Sapien's personal data handling practices or would like to exercise your privacy rights, please do not hesitate to contact our Data Protection Officer at privacy@sapien.io.

If we are unable to resolve your inquiry or complaint, you have the right to contact the data protection authority in the country where you are based.



If you reside in the European Union, you can find the details of your relevant data protection authority [here](#). We have also appointed an EU representative based in the Netherlands, who you can contact at privacy@sapien.io.

10.0 Third-Party Links

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of such websites. We encourage you to review the privacy policies of those websites before providing any personal information.

11.0 Children's Privacy

Our website is not intended for children under the age of 18. We do not knowingly collect personal information from children. If you believe we have collected information from a child, please contact us immediately.

12.0 Changes to This Privacy Notice

We may update this Privacy Notice from time to time. We will notify you of any changes by posting the new Privacy Notice on this page and updating the "Last Updated" date at the top of the notice.

13.0 Provisions Applicable to California Residents

This Section applies in all cases where we process personal information of residents of the State of California. We have drafted this section in line with the California Consumer Privacy Act (CCPA) and other applicable California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Personal Information We Collect



We collect information that identifies, relates to, describes, references, can be associated with, or is directly or indirectly related to a particular consumer ("personal information"). In particular, we have collected the following categories of personal information from consumers in the last 12 months:

Category	Examples	Source
A. Identifiers	Name, phone number, email, IP address	Directly from you when you sign up to participate in our data submission or data labeling activities and tasks.
B. Customer Records Information	Name, phone number, email	Directly from you when you sign up to participate in our data submission or data labeling activities and tasks.
D. Commercial Information	Records of your participation in Sapien's data submission and data labeling project, activities	Directly from you when you sign up to participate in our data submission or data labeling activities and tasks.
F. Internet or other electronic network activity information	Browsing history, search history, information regarding your interaction with our website, and advertisement	Information collected via cookies and similar technologies
G. Geolocation data	Your geographic location	Information collected via cookies and similar technologies
K. Inferences drawn from your personal information	Profile of your preferences	Directly from you when you sign up to participate in our data submission or data labeling activities and tasks Information collected via cookies and similar technologies

We use your personal information as described in Section 3 of the Privacy Notice.

We may disclose your personal information to a third party for business purposes as described in Section 5 of this privacy notice.

In the last 12 months, we have disclosed the following categories of personal information for business purposes to the parties listed in Section 5 of this privacy notice:

- Category A: Identifiers
- Category B: Customer Records Information
- Category D: Commercial Information
- Category F: Internet or other electronic network activity information
- Category G: Geolocation data
- Category K: Inferences drawn from your personal information

In the preceding 12 months we have not sold any personal information.

Your Rights

You can request to exercise all of the data subject rights stipulated in Sections 8.1, 8.2, and 8.3 free of charge by contacting us at privacy@sapien.io.

Non-Discrimination

We will not discriminate against you for exercising any of your privacy rights. We will not:

- Deny you any goods or services;
- Charge you different prices for our services;



- Provide a different quality of our services
- Suggest that we will take any of the actions listed above.

14.0 Provisions Applicable to China Residents

This section applies in all cases where we process personal data of data subjects residing in China.

We do not collect any personal data that might be classified as sensitive under the China Personal Information Protection Law (PIPL).

Please refer to Section 5 above to understand how we share personal information with third parties.

Your Data Subject Rights

You can request to exercise all of the data subject rights stipulated in Sections 8.1, 8.2, and 8.3 free of charge by contacting us at privacy@sapien.io.

Cross-border Processing of Personal Data

We will follow the required procedures according to the law and take necessary steps to ensure that any personal data recipients comply with the protection standards specified by the relevant laws and regulations. If mandated by the applicable laws, we will conduct a security assessment or certification or use a standard contract for the cross-border transfer of personal data.

Contact

If you have any questions about how we process your personal data, please contact the person in charge of personal data protection at Sapien: privacy@sapien.io.