



Global Applicant and Job Candidate Privacy Notice

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1. Overview

This Global Applicant Privacy Policy governs the privacy of individuals who apply for or are recruited for employment at Coinbase and its related entities (collectively, “Coinbase,” “CB,” or the “Company”). This policy describes how the personal information of our recruits and job applicants is processed, why the information is processed, and the rights of the applicants in regard to their personal information.

2. Applicability

This policy applies to all recruits and job applicants for a position with Coinbase.

3. Statement

A. The Personal Information We Collect

We collect personal information about you when you apply for a job with us and/or during the recruitment process. For purposes of this policy, personal information is data that identifies an individual or relates to an identifiable individual. This includes information you provide to us, information which is collected about you automatically, and information we obtain from third parties.

The categories of personal information we may collect about you will depend upon the nature of the job for which you have applied or are being recruited and the location of the job. And may include any of the following:

- **Identifiers:** such as your title, name, phone number, date of birth, home address, ETH address, Base name and/or ENS name and personal email address.
- **Professional or Employment Related Information, including Job Application Information:** such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience (including where relevant to job requirements, crypto knowledge, including but not limited to crypto activity and/or onchain score), membership in professional organizations and professional certifications, and other information contained in your CV/resume.
- **Educational Information & Qualifications:** such as your highest level of education, the schools you attended and when you attended them, degrees, certificates or other educational qualifications, your academic transcripts and educational references.
- **Financial Information:** such as your desired salary, bonus, benefits and stock or equity grants. You may volunteer your previous salary and/or financial and benefit package as part of the recruitment process but we will not ask for this information.
- **Background Check Information:** when permitted by applicable law, we may choose to conduct a background check in connection with your application such as to verify

professional and educational history and qualifications, credit worthiness or criminal conviction history when relevant for a position with us. Before conducting a background check on you, we will comply with any applicable legal requirements to provide additional notice and/or obtain your consent.

- **Nationality, Citizenship and Right to Work Information:** such as country of birth, government identification documents (including passports and residency permits) and, where relevant, visa information.
- **Other Application and Interview Information:** any personal information you choose to share with us in your interview or application, CV, resume, transcripts or other supporting documentation or to help us coordinate travel for an interview.
- **Inferences:** for example, we may request that you complete a pre-employment skills and aptitude assessment (such as logical reasoning, technical proficiency, or other skills related to the role), from which we may infer characteristics about your suitability for that role to support our decision-making regarding your application.
- **Biometric information:** when permitted by applicable law, we may collect biometric information (facial geometry) generated from photos on government-issued identification documents you provide, for us to conduct automated identity verification and fraud prevention checks. Before conducting such checks, we will comply with any applicable legal requirements to provide additional notice and/or obtain your consent.
- **Equal Opportunity Information & Protected Classifications Under California and U.S. Federal Law:** When you apply for a position in the United States, or indicate the U.S. as a preferred location when registering your profile, you will have the opportunity to provide information about your protected classification, i.e., gender, race/ethnic origin and/or veteran status in order for us to conduct equal opportunity monitoring. The provision of this information is entirely voluntary. If you decline to provide this information, your application(s) will not be affected in any way. This information will be held and stored anonymously and will not be used to evaluate your application for employment and also will not be used to infer any characteristics about you. Except as described above, we will not request or otherwise collect information about your protected characteristics unless you request an accommodation for a disability in the application process.
- **Commercial Information:** to the extent you incur travel-related or other reimbursable expenses during the recruitment process your banking details so that we can reimburse you for such expenses.
- **Internet or Other Similar Network Activity:** We may collect information regarding your interaction with Coinbase Career site, including through the use of cookies and other automated technology. Please review our [Cookies Policy](#) to learn about the

information we collect automatically using cookies when you visit the Coinbase Careers site. If you visit our offices during the recruitment process and use our guest WiFi, we may collect information about that use, such as type of device used and start/stop time.

CHILDREN. Please note that CB does not knowingly collect the personal information of children under the age of majority for purposes of employment. Applicants are required to affirm they are over the age of majority in their country to continue in CB's hiring process.

B. Sources of Personal Information.

We may collect the categories of personal information listed above from the following sources:

- **You**, for example, from the application forms that you submit to us).
- **Third Parties**, for example, prior employers, references, recruiters.
- **Publicly Available Sources**, for example, job-related social media platforms, job boards, court records, and credentialing and licensing organizations.
- **Service Providers**, such as communications providers, scheduling providers, and application providers, and, where permitted by applicable law, from background check providers, and credit reference agencies.
- **Automated Technology**, such as, cookies, web beacons, tags, and scripts, when you visit the Coinbase Careers site.

C. How Your Personal Information is Used.

We use and process your personal information for certain purposes that align with applicable data protection law in the jurisdiction in which you are located. We use your information:

- to communicate with you about the recruitment process and/or your application(s), including, in appropriate cases, informing you of other potential career opportunities at CB;
- where necessary for making hiring decisions;
- To check your references;
- To conduct a pre-employment or background check where permitted by applicable law;
- For identification purposes;
- For diversity and inclusion purposes where permitted by applicable law;
- For recordkeeping purposes;
- To demonstrate your agreement to, or acceptance of, documents presented to you, e.g., pre-employment arbitration agreement, acknowledgment of employment application, offer letter;

- to comply with our legal obligations (such as to carry our checks in relation to your right to work);
- to allow us to carry out our legitimate business interests, including:
 - business planning and restructuring exercises;
 - pursuing and defending legal claims;
 - preventing fraud; and
 - ensuring our administrative and IT systems are secure and robust against unauthorized access;
 - to make improvements to our application and/or recruitment process including improving diversity in recruitment practices; and
 - to protect your interests.

Further details regarding the use of your personal information may be found in the table in the *Legal Bases for Processing Your Personal Information* section below.

Know Your Customer (KYC) Process: During the interview process, we may ask applicants to create a Coinbase customer account and to complete the Company’s KYC process so that you can learn about our customer verification process and also be prepared from the start of your employment to learn about the customer experience. CB will not use any personal information that you submit through the KYC process in connection with the Company’s evaluation of your application for employment. For more information about CB’s KYC process, please refer to the [Coinbase Global Privacy Policy](#).

Automated Individual Decision-Making/Artificial Intelligence (AI). Coinbase does not make hiring decisions without human involvement. Coinbase may use AI: (i) to improve its recruitment processes and better understand the Company’s talent pool; (ii) to support fair and accurate evaluations in skills and aptitude assessments; and (iii) to verify your identity and prevent fraud. Consequently, AI may analyze your personal information to identify trends and conduct other analyses: with your consent where permitted by applicable law, for diversity monitoring, for identification purposes, preventing fraud, and for other purposes listed above.

D. How We May Disclose your Personal Information

We take care to allow your personal information to be accessed only by CB personnel who require access to perform their tasks and duties, and to disclose your personal information only to third parties who have a legitimate purpose for receiving it. CB will never sell or rent applicants’ personal information to third parties. We will disclose your information only in the following circumstances:

- **Internal Disclosures:** Your personal information will be disclosed to CB employees where they need your personal information to undertake their duties with respect to our hiring process. This includes, for example, CB’s People Ops departments, which facilitate CB’s recruitment efforts and maintain personnel records.

- **Corporate Affiliates:** We may disclose your personal information to other Coinbase Group entities as may be necessary to administer our relationship with you or operate our business.
- **Service Providers and Other Third Parties:** We may also disclose your personal information for the purposes described previously to:
 - references as part of the recruitment process (provided we obtained your consent);
 - third-party service providers who assist us in administering our hiring process;
 - credit and criminal background check companies (when credit and other background checks are allowed by applicable law);
 - professional service providers and advisors who perform functions on our behalf, such as lawyers; and
- **Required By Law:** When required by law, such as when we respond to subpoenas, court orders, legal process, or a discovery request in civil litigation;
- **Legal Violations:** If we believe that your actions violate applicable law, or threaten the rights, property, or safety of our Company, our users, or others;
- **Corporate Transactions:** We may also disclose your personal information to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets in circumstances which may require the use or transfer of such personal information. This may also include, without limitation, in connection with any bankruptcy or insolvency event. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy notice.

Finally, we may collect, use and disclose your personal information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect, use or disclose your personal information, and, where required, obtain your consent for doing so.

E. Security for Your Personal Information

We understand how important your privacy is, which is why CB maintains (and contractually requires third-party service providers that process your information on CB's behalf to maintain) appropriate physical, technical, organizational and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us. We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with applicable laws and regulations. For example, we use computer safeguards, such as firewalls and data encryption, we enforce physical access controls to our buildings and files; and we authorize access to personal information only for those employees who require access to fulfil their job responsibilities. Where we disclose your data to third-party service providers, we provide written instructions to them to ensure that your data is held

securely and in line with the requirements of applicable data protection law. Third-party service providers must implement appropriate technical and organizational measures to ensure the security of your data.

F. Data Retention

We will store the personal information we collect about you for no longer than necessary and in accordance with our legal obligations and legitimate business interests. If your application is successful and you become an employee of Coinbase, where permitted by local law, the personal information we collect during the application process may be transferred to your personnel file and stored in accordance with our internal policies, which you will be able to access at the start of your employment.

If your application is not successful, we will retain your personal information for a period after your application. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision and to help us better understand, analyse, and improve our recruitment processes. We may also keep your personal information for the purpose of considering your application for employment with other CB entities or for other positions with CB and will request your consent to do so when required by applicable law. Where you have given us your consent to process certain equal employment opportunity Information, we may anonymize and aggregate this information and store it in a form that does not personally identify you, for the purpose of monitoring and improving the application and recruitment process.

G. International Transfers of Your Personal Information

Coinbase has entities and offices in countries around the globe. As part of our global operations, we transmit information between and among these entities and their service providers. As a result of the global nature of our business, your personal information may be transferred to CB entities and their service providers located outside your country of residence. You can find the location of certain CB corporate group members [here](#). The data protection laws in these countries may be less stringent than the laws in your country of residence. Nonetheless, where required by the applicable data protection law, we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country where you reside. Where applicable law requires a data transfer mechanism to guarantee an adequate level of protection, we will rely on contractual agreements. If applicable law confers on you the right to receive a copy of the contractual agreement which covers your personal data, you may exercise that right through the contact information at the bottom of this Privacy Policy.

If you reside in a country that allows cross-border data transfers with your consent, CB will rely on your consent for the transfer of your personal information outside your country of residence unless an alternative or additional data protection mechanism is required by applicable law. Please refer to the section below on “Additional Information for Specific Jurisdictions” for more information concerning international data transfers.

H. Additional Information for Specific Jurisdictions

California. This section applies only to job applicants who reside in the state of California in the United States (“California Applicants”). This section applies to personal information collected through the Site and in any other way, such as when California Applicants visit our offices.

California Notice at Collection: Coinbase collects the categories of personal information identified in the section entitled, “The Personal Information We Collect About You”, above, for the purposes identified in the section entitled, “How We Use Your Personal Information”, above, and retains personal information for the period described in the section entitled, “Data Retention”, above. We do not, and will not, sell your personal information or disclose it to third parties for cross-context behavioral advertising. We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

Your California Data Rights. Subject to applicable exceptions, California Applicants have the following rights under the CPRA:

- **Right to Know:** You have the right to submit a verifiable request for specific pieces of your personal information obtained from you and for information about Company’s collection, use, and disclosure of categories of your personal information.
- **Right to Delete:** You have the right to submit a verifiable request to delete personal information that Company has collected from or about you.
- **Right to Correct:** You have the right to submit a verifiable request to correct inaccurate personal information about you maintained by Company, taking into account the nature of the personal information and the purposes of processing the personal information.

Non-Discrimination: Company will not unlawfully discriminate against you for exercising your privacy rights under the CPRA.

How to Exercise Your California Data Rights. You can exercise these rights via email by contacting dpo@coinbase.com.

How We Will Verify Your Request. We match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (e.g., a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

Authorized Agent. If an authorized agent submits a request to know, correct, or delete on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity. You can obtain an “Authorized Agent Designation” form by contacting us at dpo@coinbase.com.

Note on Deidentified Information. At times, the Company converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (“Deidentified Information”). Company maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that Company may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual. Company prohibits vendors, by contract, from attempting to reidentify Company’s Deidentified Information.

All Locations Outside the United States

Identification of the Controller. The data controller of your personal information is the Coinbase corporate group member to which you applied for employment, who can be reached at dpo@coinbase.com.

Your Rights in Relation to Your Personal Information. To the extent provided by applicable law and subject to any relevant exceptions and limitations, you may be able to exercise some or all of the rights below. If any of the rights listed below are not provided under law for your country of residence, CB has absolute discretion in providing you with those rights.

- **Access and portability.** You may request that we provide you a copy of your personal information held by us. Please note we will comply with your request to the extent required by applicable data protection and privacy laws and requirements. This information will be provided subject to a potential fee associated with gathering of the information (as permitted by law). In certain circumstances, you may request to receive the personal information that you submitted to us in a structured, commonly used and machine-readable format, and to have us transfer that personal information directly to another data controller.
- **Rectification of incomplete or inaccurate personal information.** You may request us to rectify or update any of your personal information held by CB that is inaccurate.
- **Erasure.** You may request that we erase your personal information. Please note that we may be required by law to retain your information.
- **Withdraw consent.** To the extent the processing of your personal information is based on your consent, you may withdraw your consent at any time. Your withdrawal will not affect the lawfulness of CB’s processing based on consent before your withdrawal.

- **Restriction of processing.** You have the right to request restriction of processing of your personal information in certain situations, such as while a dispute concerning the accuracy of personal information is being resolved. We may continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
- **Objection to the inclusion of information.** In some jurisdictions, you may have the right to object to the way we use your personal information where the legal basis of our use is our legitimate interest, or where your personal information is used for profiling.

If you reside in Bermuda: In addition to the rights described above, you also have the right to object to the processing of your personal information: (a) for purposes of direct marketing; or (b) where the processing causes or is likely to cause substantial damage or distress to you or others.

How to Exercise Your Rights. You, or an authorized individual who we can verify is acting on your behalf, can exercise the applicable rights by contacting us using the contact details at the bottom of this notice. We will not discriminate against you for exercising your rights.

Submitting Complaints. If you have a complaint about how we have processed your personal information, you may submit it to us by using the contact information at the bottom of this notice. Please clearly describe your concerns and include your preferred contact details. We will aim to respond promptly. If you are not satisfied with our response to your complaint or otherwise believe that your personal information has been processed in violation of applicable data protection law, you may lodge a complaint with the competent supervisory authority in the country where you reside or where the alleged violation occurred.

International Data Transfers for Brazil Residents. We may transfer your personal information to other CB corporate group members where authorized employees may process your personal information for the purposes stated in Section C, above. The data transfer may take the form of e-mail or remote access to information stored in CB's or in authorized service providers' information systems. CB corporate group members will retain transferred personal information for the period described in Section F, above. CB has entered into Standard Contractual Clauses ("SCCs") with the corporate group members and relevant authorized providers to ensure an adequate level of protection for your transferred personal information. The SCCs describe the responsibilities of CB group members' authorized employees when they process your transferred personal information as well as the safeguard for your transferred personal information. You can obtain a copy of the SCCs by submitting a request using the contact information listed in Section K, below. You have the rights described above in relation to the CB corporate group members' processing of your personal information and can exercise those rights as described above. You also have the right to lodge a complaint with the Autoridade Nacional de Proteção

de Dado (“ANPD”) if you have concerns regarding the CB’s or corporate group members’ processing of your personal information.

European Economic Area, Switzerland, and United Kingdom

International Data Transfers. We rely on Standard Contractual Clauses approved by the competent government authority to facilitate the international transfer of personal information collected in the EEA, the United Kingdom and Switzerland (“European personal information”) and for any onward transfer of such information unless the European countries have determined that the receiving country provides an adequate level of data protection. This includes transfers from our EU-based CB operating entities to our US-based operating entity, Coinbase, Inc. These Standard Contractual Clauses provide the same level of protection for European personal information as required under applicable data protection law.

Legal Bases for Processing Your Personal Information. We are required to provide you with information regarding our legal grounds or “legal basis” for processing your personal information. Our legal basis for the collection and processing of your personal information is explained in the chart below:

Category of Personal Information	How We Use It	Legal Basis for Processing
Personal Identifiers and Contact Information	We use this information to open and maintain applicant records.	The processing is necessary for our legitimate interests, namely managing job applications for positions with Coinbase.
	We use this information to communicate with you as part of the recruitment process.	The processing is necessary for our legitimate interests, namely communicating with applicants and managing job applications for positions with Coinbase.
Job Application Information & Professional or Employment Related Information; Educational Information & Qualifications	We use this information to process and assess your application, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We use this information to calculate proposed salary and to assess eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We use this information to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely reviewing and updating our application process.
Results of Reference Checks and Screening , such as verification of education and employment history.	We use this information to process and assess your application, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.

	We use this information to fulfil our obligations under applicable law, regulations, legal processes or enforceable government requests.	The processing is necessary for compliance with a legal obligation to which we are subject.
Nationality, Citizenship and Right to Work Information	We use this information to determine your eligibility to work.	The processing is necessary for compliance with a legal obligation to which we are subject.
	We use this information to fulfil our obligations to relevant government authorities.	The processing is necessary for compliance with a legal obligation to which we are subject.
Interview Information; Inferences	We use this information to process and assess your application, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We use this information to calculate proposed salary and to assess eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We use this information to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely assessing and managing applications for positions with Coinbase.
Information Provided by You in the Course of the Application Process	We use this information to process and assess your application, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We use this information to respond to your enquiries and to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely managing applications and improving the application process.

Consent. We are not required to obtain your consent for most of the processing activities that we undertake in respect of your personal information in relation to your job application. In certain circumstances, we may need your consent to use certain "sensitive" personal information, such as information about your health or ethnicity. You will never be obliged to give us this consent. Where you have given us consent to collect, use or disclose your personal information in a certain way, you may withdraw your consent at any time by contacting us using the contact information below.

I. Changes to This Policy

We may modify this Privacy Policy from time to time. We will indicate that this policy has been changed by modifying the date at the top of this page. If we materially change this Privacy Notice in a way that materially affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

J. Contact Information

We have appointed a data protection officer to be in charge of the protection of personal information in locations where required by law. You can reach the data protection office for your location at dpo@coinbase.com. Because email communications are not always secure, please do not include sensitive information in your emails to us.

4. Roles and Responsibilities

The roles and responsibilities in relation to the requirements and information set forth in this policy are as follows:

Role	Responsibility
All recruits and job applicants	Be familiar with your rights regarding personal information and with data protection complaint mechanisms as laid out in the policy.
Coinbase	Collect, use, and protect recruit/applicant personal information in accordance with standards outlined in the policy.