Privacy Policy
For Travelers

Last updated: January 27, 2022 (v1.1)

Welcome to The Commons Project Foundation! This Privacy Policy (“Policy”) describes how The Commons Project Foundation (“TCP,” “we” or “us”) collects, uses, and shares information about you when you use the CommonCheck service (“Service”) for verifying your health credentials and related entry requirements for travel to your anticipated destination. Before using the Service, please read the following carefully to understand how we will treat your Service Data.

Summary of Changes Made
Deletion of duplicative section, updated logo and clarifications.

Overview of the Service
You may have been directed to upload a digital health certificate (“Certificate”) and other personal information as part of a government’s travel portal or as part of TCP’s portal related to the Service. The Certificate also may contain a Quick Response Code (“QR Code”). This Service provides verification services to the government (of your anticipated destination) to verify the authenticity of the digital health credential you provided, to match your vaccination and/or test results against the issuer (for instance, a health clinic) of your credential, and to compare your submitted information against the applicable government’s travel requirements for your anticipated destination and period of travel.

What We Collect
We collect the following categories of personal data, for the purpose of providing you the Service “Service Data”:

- Information you Provide To Us. In order to perform this Service, the information you provide (or that resides in your Certificate or the QR code) includes:
  - First and last name
  - Passport Number
  - Passport Issue Date
○ Nationality
○ Flight Number
○ Departure Date
○ Date of birth
○ Date of your vaccination(s) and/or diagnostic test(s)
○ Issuer of your vaccination(s) or diagnostic test(s)
○ Issuer of your health credential
○ Maker of vaccination(s) and/or diagnostic test(s)
○ Type of vaccine(s) or/or diagnostic test(s) and result of test(s), if diagnostic
○ QR Code of your health credential
○ Your anticipated destination and dates of travel
○ Your anticipated country of travel
○ Your country of origin
○ Email address (if you contact us by email so that we may respond to you)
○ Information you provide to us, such as by email in connection with
technical assistance or other requests
○ Information We Collect Automatically. We collect anonymized
information related to how you use the CommonCheck Service.

- Processing of Information by Third Parties. We may use third-parties to assist in
providing the Service. Third-parties are used to provide or process verifications,
facilitate ingestion of paper credentials and convert them to digital formats as
well as process such verifications against the country requirements based on
those credentials. Depending on your credential type, the Service will compare
your information to a third-party (or our own) verification databases as part of the
Service.

How We Use Information About You

- We do not sell your personal data or Service Data.

- We use your information solely for the purpose of providing the Service. The
information you enter may be used to verify you as the owner of the provided
Certificate, to compare your travel information against the applicable
government’s travel database of approved healthcare institutions and the
government’s health-related entry requirements, to verify the issuer of and
information within your Certificate. Your information may be stored or shared as
described in this policy.

- We use your information to measure use of, analyse performance of, fix errors in,
provide support for, improve, and develop the Service.

- We may also ask for your consent to use your information for a specific purpose
that we communicate to you.
How We Share Information

With respect to the Service, we may share information about you as follows:

- We share information with vendors, consultants, and other service providers who need access to such information to carry out the Service;
- We may disclose personal data to law enforcement, regulators or others if we believe in good faith that it’s necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights, safely or property or of users of our products or services or others; and/or (d) to investigate or assist in preventing any violation of the law;
- We may share information if we believe your actions are inconsistent with the CommonCheck Service Terms and Conditions, or applicable laws or regulations; and
- We may share information as required by applicable laws or regulations including those governing non-profit organizations.

Information Not Covered

We may also share aggregated or de-identified or anonymized information, which cannot reasonably be used to identify you for our lawful business purposes, including to analyze, build and improve the Service and improve our services, provided that we will not share such data in a manner that could identify you.

Security

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

Retention and Deletion

When you provide digital information (such as a Smart Health Card QR code) to TCP (and TCP Representatives and/or TCP Contractors) we do not store your health or Service Data, other than as provided herein and as reasonably required to provide the Service or respond to your inquiries or requests, or as required by law or legal process.

TCP temporarily stores your Service Data to make an assessment of the information provided for completion of the Service.

For information outside of the Service, such as by email, we may store this
information in accordance with applicable laws to enable us to respond to your request or email. If you provide protected data while communicating via email, we will destroy it at our earliest convenience or as required by law.

Children

The Service is not designed or intended for children/youths under 16. If you are based outside the United States, you must be over the age required by the laws of your country to use the Services. Parental/guardian submission of children's data for the purposes of validating submitted information is permitted.

Your Choices

Under various laws and regulations, including the European Union General Data Protection Regulation (EU GDPR), individuals who are residents of applicable jurisdictions have the right to request certain information about their data collection practices or request deletion of their data under the law. TCP complies with the GDPR and applicable laws and regulations. Your rights may include:

Access: you may ask us if we hold your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you.

Correction: you may request that any incomplete or inaccurate personal data we hold about you be corrected.

Erasure: you may ask us to delete or remove personal data that we hold about you in certain circumstances.

Restriction: you may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy.

If you wish to exercise any of your rights, you may contact us at privacy@thecommonsproject.org. Please include in your request sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information, including, but not limited to, the original QR code that was present on your digital health certificate (if applicable). We may contact you if we are in need of information to support your request or verify your identity as related to the Service Data. TCP will not discriminate against you in any way based on your exercise of these rights or any rights protected by law.

Changes

We may change this Policy from time to time. If we do, we will let you know by revising
the date at the top of the Policy. If we make a change to this policy that, at our sole discretion, is material, we will summarize the changes. We encourage you to review this Policy whenever you access or use Service. If you continue to use the Service after a Policy changes go into effect, you are consenting to the revised policy.

Contact Us

If you have any questions about this Policy, please email (preferred) privacy@thecommonsproject.org

or in writing to our US corporate office (Please provide all correspondence in English):

The Commons Project Foundation
420 Fifth Avenue, 19th Floor
New York, NY 10018
Attn: PRIVACY REQUEST