

# Privacy Policy

Last updated February 4, 2023

## Thank you for using Clubhouse!

Clubhouse is a new type of social network based on voice. Our products include our iOS and Android apps and our website (our "**Products**"). They allow you and others to use your voices to interact with each other in real time, and to share recordings of those interactions for others to enjoy later. We help people around the world come together to talk, listen, and learn from each other. We provide a place to meet with friends and with new people to tell stories, ask questions, debate, learn, have impromptu conversations, and share them with others.

When you use our Products, you provide personal information to us. We wrote this privacy policy (the "**Privacy Policy**" or "**Policy**") to help you understand what personal information we collect, how we use it and disclose it, how long we retain it, and what choices you have about it. This Policy does not cover information that does not identify you. Nor does it cover the practices of Clubhouse users. Users who listen to you speak on Clubhouse, or view information you share on Clubhouse, might save that information outside of our Products using other tools.

You may have specific privacy rights in your state or region. In the United States, residents of California and other states have specific privacy rights. Residents of the European Economic Area ("**EEA**"), the UK, Brazil, the Republic of Korea, and other jurisdictions also have specific rights

- Residents of California can find our California Consumer Privacy Act disclosures [here](#).
- Residents of the EEA, the UK, and Brazil can find our Notice to EEA, UK, and Brazilian Data Subjects [here](#).
- Residents of Europe who are not Clubhouse users can find our Non-User Data Notice [here](#).

These additional disclosures supplement, and should be read together with, this Privacy Policy.

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## **1. Information We Collect**

### **A. Information You Provide**

When you use Clubhouse, we collect personal information that you provide to us. This includes:

#### **Account Information**

When you set up an account, we may ask you to provide information about yourself, including your name, phone number, email address, and date of birth. If you use our Products as a guest without setting up an account, we may ask you to provide your phone number.

#### **Biographical Information**

We may also ask you to provide us with some additional personal information about you that will be visible in our Products, such as a profile picture, and a bio in your profile to tell other Clubhouse users more about you. When you change your profile picture we store a copy of the new picture you upload and retain all profile pictures you uploaded previously for trust and safety purposes and in accordance with our data retention policies.

#### **Interests**

You have the option of choosing topics you're interested in to help us better personalize our Products to you. You can decide whether your interests are shared with other users as part of your profile or hidden.

You can add, remove, share or hide interests whenever you want.

#### **Social Media And Contact Information**

You may choose to connect your other social media accounts, or sync your contacts.

### **B. Information We Get When You Use Our Products**

When you use our Products, we collect additional personal information based on your activity and other personal information you might choose to provide. This includes:

## Usage And Activity Information

We collect information about when and how you use our Products. This includes information about rooms you create, rooms you speak in, rooms you join, Clips you create, and Replays you create. It also includes who you follow, what clubs you create or join, links you share, queries you submit, and what kind of content you're interested in.

## Conversations

- **Trust and Safety.** We record conversations in all rooms so that we can investigate any complaints regarding violations of our Community Guidelines or our Terms of Service, or otherwise illegal or illicit activity. This is part of our commitment to users under our Terms of Service to provide the safest possible space for their conversations, and to combat illegal and harmful conduct and content. If we receive a complaint while the room is live, we will review the recording to determine whether a violation has occurred. We will retain the recording as long as reasonably necessary to investigate the potential violation. Otherwise, we delete the recording shortly after the room ends, usually within 10 minutes.
- **Replays.** We record conversations in public rooms and make them available to other users where the room creator instructs us to do so by enabling the "Replay" feature. When Replays are enabled, the recording will be stored by Clubhouse and may be made available to other users on Clubhouse at the room creator's instruction. Replays may also be available outside of Clubhouse.
- **Clips.** Users may also record portions of conversations when a room creator enables the "Clips" feature. When Clips are enabled, anyone in the room is able to generate a video file on the user's local iOS or Android device that contains the last 30 seconds of audio material from the room, and a graphic depicting the room title and speakers. This video file is not transmitted to Clubhouse or stored by Clubhouse. Rather, it is saved on the user's local device, where it can be posted to other online platforms or sent to other people through SMS, other apps or other communication tools.

## Messages

We store the messages you send to and receive from other users and information about those messages, including the messages you send via Backchannel, House Chat, Wall Chat or other messaging features in the Products. We review the contents of these messages if a user reports, or we otherwise detect, a potential trust and safety violation or potentially illegal or illicit activity.

## **Other Communications**

We collect information about the messages you send us when you contact us with questions or feedback, including the contents of those messages.

## **Payment And Transaction Information**

We collect information about payments you make within our Products and your transaction history. While Clubhouse does not collect payment card information, our payment provider will collect payment card information and associated account information if you choose to make payments within our Products.

These services are provided by Stripe, Inc. and its affiliates (“**Payment Processor**”). The Payment Processor’s use of your personal information is governed by its terms and conditions (<https://stripe.com/connect-account/legal>) and privacy policy (<https://stripe.com/privacy>).

## **Contacts**

If you give us permission to sync your contacts, we will store identifiers known as hash values derived from the phone numbers of your contacts, and we will update your contacts periodically. Similarly, if you invite somebody to join Clubhouse, we will store a hash value derived from the phone number you provide. We do not collect names, email addresses, or any other information associated with your contacts.

## **Log Data And Device Information**

We may collect information from and about the devices you use. In particular, we may collect information about log-in authentication attempts and successful authentications, your hardware and software, such as the hardware model, operating system version, device memory, unique application identifiers, apps installed, unique device identifiers, browser type, and information about your wireless and mobile network connections, such as mobile phone number, service provider, IP address, and signal strength.

## **Cookie Information**

We use cookies (small text files sent by your computer each time you visit our website, unique to your Clubhouse account or your browser) to get log data. Some of these cookies are used to help us understand how you use our Products, how many people use our service, and how they use it. Other cookies are used to help us track the efficiency of our advertising campaigns on other platforms. For more detailed information about cookies, please see our [Cookie Policy](#).

## C. Information From Third Parties

### Social Media Information

If you link your Clubhouse account to Twitter, Instagram, or any other social media services, we may receive information from those other services. The information we receive will depend on the privacy settings on those other services.

### Service Providers

We may also receive information about you from our service providers.

## D. Information About Guests

We may allow you to use our Products to a limited extent without opening an account, such as by allowing you to join a room for a limited amount of time using a link, or accepting invitations for rooms scheduled for a future date. We will only allow you to do so if you agree to our Terms like any other user must. Similarly, all provisions of our Terms, our Privacy Policy, and our Community Guidelines apply to you the same as they do for any other user.

## E. Information About Non-Users

Clubhouse users may sync their contact lists to Clubhouse in order to help Clubhouse connect them to existing users, invite new users, and to connect users and their contacts with one another on Clubhouse. Similarly, users may send people invitations by manually entering a telephone number. In either case, the only information Clubhouse stores is a hash value derived from the phone number. Clubhouse does not collect names or any other information associated with your contacts, and we do not share the hash values we collect or make them available to others.

For more information, please review our [Non-User Data Notice](#).

## 2. How We Use The Information We Collect

We use the personal information we collect to provide our Products to you and to improve them. Specifically, we use the data we collect to:

- Register your account, verify your identity (e.g. checking that your phone number belongs to you), and verify the accuracy of your information.

- Develop, operate, improve, maintain, and protect our Products.
- Personalize our Products. As set out in our [Terms of Service](#), we use the information we collect to personalize our Products in a number of ways.

For more information on personalization, see our Personalization [FAQ](#).

- Send you communications. For example, we may use email, text messages, or app-based notifications to respond to support inquiries, share information about our Products, and tell you what's happening on Clubhouse.
- Verify and enhance the safety and security of our Products.
- Verify and analyze user engagement, trends, and usage.
- Assess the efficiency of our advertising campaigns on other platforms.
- Handle and record user rights requests, including opt-ins and opt-outs.
- Prevent fraud or other unauthorized or illegal activity.
- Enforce, investigate, and report conduct violating our Terms of Service, Community Guidelines, or other policies.
- Respond to requests from law enforcement agencies or other government agencies, and comply with legal or regulatory requirements.

### 3. How We Disclose The Information We Collect

We do not sell personal information about our users. We may, however, disclose that information to:

#### **Other online services you connect to your Clubhouse account.**

If you choose to link your Clubhouse account to Twitter, Instagram, or any other services, we may disclose information to those other services at your direction when using our Products.

#### **Services we use to market Clubhouse**

When we market our Products we may disclose information to the websites and apps we use to market our Products, including Facebook, Google, Twitter, Microsoft, LinkedIn, Trade Desk, or others.

#### **Service providers and other third parties**

We employ third parties to process information on our behalf based on our instructions and for the purposes described in this Privacy Policy, including providers of services relating to cloud computing, analytics, security, enforcement of content policies (including our Community Guidelines), and user support.

## **Law enforcement or governmental or non-governmental organizations**

If we believe that disclosure is reasonably necessary to comply with a law, regulation or legal request; to protect the safety, rights or property of the public, any person or Clubhouse; or to detect, prevent or otherwise address illegal conduct, fraud, security or technical issues, we may disclose information to law enforcement agencies, other governmental agencies, or private parties as needed.

## **Our wholly owned subsidiaries and affiliates**

If we were to engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy, we would disclose your information to parties involved in such a process (for example, a purchaser).

## **4. How Long We Keep Information**

We keep your personal information only for as long as we reasonably need it to provide our Products to you and fulfil the purposes described in this Policy. This is also the case for anyone that we disclose your personal information to and who carries out services on our behalf. In general, this means we will retain your personal information for as long as you have a Clubhouse account.

For users located in the EEA, the UK or Brazil, you'll find specific data retention periods for the different purposes of processing under [Justifications for Data Processing](#) in the Notice to European and Brazilian Data Subjects.

We may delete some personal information earlier based on changes to your account settings, such as if you instruct us to delete your Contacts. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll remove any information that can identify you from our systems.

As explained above, we record conversations in all rooms so that we can investigate any complaints we might receive relating to violations of our Community Guidelines, our Terms of Service, or otherwise illegal or illicit activity. If we receive a complaint while the room is live, we will retain the recording as long as reasonably necessary to investigate the potential violation. If no potential violation is flagged after the room ends, we delete the recording shortly thereafter, usually within 10 minutes.

We record conversations in public rooms and make them available to other users where the room creator instructs us to do so by enabling the "Replay" feature. When Replays are enabled, the recording will be stored by Clubhouse and may be made available to other

users on Clubhouse or other people outside of Clubhouse. Replays are created and saved at the direction of users, and remain available unless the room creator instructs us to remove the Replay.

Users may also record portions of conversations when a room creator enables the “Clips” feature. When Clips are enabled, anyone in the room is able to generate a video file on the user’s local iOS or Android device that contains the last 30 seconds of audio material from the room, and a graphic depicting the room title and speakers. Clips are not transmitted to Clubhouse or stored by Clubhouse. Rather, Clips are saved on the users’ local devices, and it is up to users to decide how long they will retain any Clips they record.

## 5. Managing Your Information

There are a variety of ways you can manage the personal information we have about you. Specifically, you can:

- **Request access to the information we collect and hold about you.** We'll aim to provide this to you within 30 days after you submit your request through our [Privacy Center](#).
- **Have your information corrected or deleted.** You can update your information in your profile or delete your data by closing your account.
- **Protect your profile.** If you want to restrict the availability of certain information in your Clubhouse profile, you can do so in your account settings page. Details about protected profiles can be found in our [Knowledge Center](#).
- **Disconnect social media accounts.** When you connect your social media accounts to Clubhouse, we notify those platforms. You may disconnect your social media accounts directly within the Products at any time via your account settings page.
- **Delete your contacts.** If you chose to sync your contacts, you can always change your mind by disabling contact sync in your account settings page.
- **Opt out of push notifications.** If you opt in to receive push notifications within the Products, we may send push notifications or alerts to your mobile device from time to time. You can deactivate push notifications and alerts at any time by changing your device settings, changing the push notification settings within the Products, or deleting the Clubhouse app from your iOS or Android device.
- **Pause or reduce notifications.** If you want to pause notifications for a while, or reduce the number of notifications Clubhouse sends you, you can do so in your account settings page.
- **Disable optional recording features.** Creators of a room or moderators may disable optional audio recording features, such as Clips or Replays.

- **Revoke consent you have given or object to us processing your information.** You can revoke any consent you have given us by adjusting your settings, or object to processing personal information in certain circumstances.

To use these tools please visit your account settings, our [Knowledge Center](#), or your device settings.

## 6. Transferring Information

While our Products are offered worldwide, we are based in the United States and rely on cloud storage providers that store user data on our behalf in the United States. When you use our Products, your personal information may be transferred and stored outside your home country, including in the United States, for the purposes described in this Policy. The privacy protections and the rights of authorities to access your personal information in such countries may not be equivalent to those of your home country. For European Data Subject more details are provided in "[Storage and Transfer](#)".

## 7. Revisions

We may change this Policy from time to time. If we do, we'll post any changes on this page. We will provide a more prominent notice or get your consent where required by law.

## 8. Contact Us

The best way to manage personal information about you as described above or get in touch with us is through your account settings or via our [Knowledge Center](#).

Alpha Exploration Co. Inc. (doing business as "**Clubhouse**") is responsible for your information. You can contact Clubhouse at 548 Market Street PMB 72878, San Francisco, California 94104, USA.

*Last updated February 4, 2023*

# California Consumer Privacy Act Disclosures

*Last Modified: February 4, 2023*

The California Consumer Privacy Act (CCPA) requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have

explained above. This notice supplements information contained in our [Privacy Policy](#) and applies solely to residents of the State of California (“consumers” or “you”).

Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”) have the same meaning when used in this notice and policy. This notice and policy does not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception under the CCPA applies. You can download a pdf version of the notice and policy [here](#).

## 1. Your Rights To Access And Deletion

**Access.** You have the right to request a copy of the personal information we collect, use, or disclose about you. You can submit a request for this information via our [Knowledge Center article](#).

**Deletion.** You also have the right to request the deletion of personal information. You can submit a request for the deletion of personal information via our Knowledge Center using this [form](#). Alternatively, you can send your request to us at the address noted in [Section 6](#) of this Disclosure.

**Verification.** Clubhouse may ask you to provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Clubhouse will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

**Exceptions.** In accordance with the CCPA, Clubhouse will not provide the following information in response to access requests for the following reasons:

- Account data such as account passwords and identity verification codes, unmasked phone numbers, or email addresses, because of the sensitive nature of the information.
- Other users’ and employees’ personal information, including the names and account information of individuals who may have invited you to the app, other users’ feedback, and employees’ comments because the information belongs to other individuals and disclosing it may impact their rights.
- Internal proprietary attributes that enable us to provide various aspects of our app, including channel and room customization, suspension decisions, and content suggestions, because the information is protected by federal and state trade secret law.
- Server logs that are older than 30 days because we use these to ensure the security and integrity of our app.

**Clubhouse does not sell the personal information of its users.** When a business sells your personal information, you have a right to opt out. Clubhouse does not sell, and in the preceding 12 months did not sell, California residents' personal information. Clubhouse does not have actual knowledge that it sells the personal information of minors under 16 years of age. All users under 18 are defaulted into a protected profile.

## 2. Personal Information Handling Practices

Below you will find a list of the categories of personal information we collect about California residents and have collected in the preceding 12 months. For each category of personal information we have collected, we reference the category or categories of personal information in the CCPA that most closely describe the personal information

### Personal Information Handling Practices

CCPA Category	Category Of Personal Information We Collect
Identifiers	Name, username, telephone number, e-mail address, IP address, profile picture, purchase or transaction history, information provided in user's profile or bio
Categories listed in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))	Name, username, age, telephone number, e-mail address, IP address, profile picture, purchase or transaction history, preferred language, interests, app usage and activity information, following and follower lists, contact lists (hashed telephone numbers only), information from user's other social media accounts (if user chooses to connect them), messages sent and received from other Clubhouse users, questions or feedback sent to Clubhouse
Characteristics of protected classifications under California or federal law	Age
Commercial information	Purchase or transaction history, interests, app usage and activity information, following and follower lists, contact lists (hashed telephone numbers only), questions or feedback sent to Clubhouse

CCPA Category	Category Of Personal Information We Collect
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web website, application, or advertisement	IP address, domain name, browsing history, browser type and settings, operating system, network information, service provider, signal strength, device type, device memory, device’s call log data, unique application identifier, unique device identifier, apps installed on device, time of visit, duration of visit, date and time stamps of actions
Geolocation data	IP address
Audio, electronic, visual, thermal, olfactory, or similar information	Recordings of conversations in Clubhouse rooms [(for trust and safety purposes; Replays; or Clips)]
Professional or Employment related information	Information that may be supplied in user’s bio
Education Information	Information that may be supplied in user’s bio
Inferences drawn from the information above	Information about user activity used to personalize recommendations regarding rooms or clubs a user might join, people a user might know, or other content a user might enjoy on Clubhouse.

Clubhouse collects this personal information from the following sources:

- **Information Provided By You.** When you use Clubhouse, we collect personal information that you provide to us. When you set up an account, we may ask you to provide information about yourself, including your name, phone number, email address, and age (“**Account Data**”). We may also ask you to provide us with some additional personal information that will be publicly visible in our Products, such as a profile picture, a bio in your profile to tell other Clubhouse users more about you, and topics you’re interested in. You may also choose to connect your other social media accounts, and sync your contacts. If you choose to send money to other users, you will be asked to provide a debit or credit card number and other account information.
- **Information We Get From You When You Use Our Products.** When you use our Products, we collect additional personal information based on your activity and other personal information you might choose to disclose. As discussed in our

Privacy Policy, this may include usage and activity information, conversations, messages, other communications, transaction data, contacts, log data and device information, and cookie data. Clubhouse may collect information from the computer, tablet, phone, or other device that you install our mobile application on, that you use to access our Products, or that you use to open an email or click on an advertisement from Clubhouse. Clubhouse does not respond to “do not track signals.”

- **Information From Third Parties.** If you link your Clubhouse account to Twitter, Instagram, or any other social media services, we may receive information from those other services. The information we receive will depend on the privacy settings on those other services. We may also receive information about you from our service providers.

Clubhouse collects, uses, retains, and discloses this personal information for the following purposes:

- Register your account, verify your identity, and verify the accuracy of your information.
- Develop, operate, improve, deliver, maintain, and protect our Products.
- Personalize our Products by suggesting rooms, houses, clubs, and other content we think you might be interested in. We also use this information to (i) suggest users you might like to follow; and (ii) suggest your profile to other users.
- Send you communications via email or text message. For example, we may use email or text messages to respond to support inquiries, share information about our Products, highlight content we think you might like, tell you about features we think you might like to hear about, or suggest ways to improve your Clubhouse experience.
- Verify and enhance the safety and security of our Products
- Verify and analyze user engagement, trends, and usage
- Assess the efficiency of our advertising campaigns on other platforms
- Handle and record consumer rights requests, including opt-ins and opt-outs
- Prevent fraud or other unauthorized or illegal activity
- Enforce, investigate, and report conduct violating our Terms of Service, Community Guidelines, or other policies
- Respond to requests from law enforcement agencies or other government agencies, and comply with legal or regulatory requirements

### **3. Sharing Of Personal Information**

In the preceding 12 months, Clubhouse disclosed the above categories of personal information to the following categories of third parties for a business purpose, in some cases as directed by you:

- **Third parties and service providers that provide products or services to us.** In particular, companies that help us support our Products or provide services to you. Clubhouse may use third parties or service providers to process information on our behalf based on our instructions and for the purposes described in the Privacy Policy, audit interactions and transactions with you, address security, fix errors, maintain accounts and provide customer service, assist with our internal research, and verify service quality or safety.
- **Other online services you connect to your Clubhouse account.** If you link your Clubhouse account to Twitter, Instagram, or any other services, we may disclose your information to those other services at your direction when using our Products.
- **Government regulatory authorities.** We may disclose your personal information to relevant government regulatory authorities if we believe the disclosure is reasonably necessary to comply with a law, regulation; protect the safety, rights or property of the public, or any person or Clubhouse; or to detect, prevent or otherwise address illegal conduct, fraud, technical or security issues.

#### **4. Non-Discrimination**

Clubhouse will not discriminate against you if you exercise your privacy rights.

#### **5. Authorized Agent**

In addition to exercising your rights yourself, you may also designate an authorized agent to make these requests under the CCPA on your behalf. In order to do this, we may ask you to verify the request directly using the phone number or email address connected to your account, or via other means. The information Clubhouse asks you to provide to verify your identity may depend on your prior interactions with us and the sensitivity of the personal information at issue.

#### **6. Contact Information**

If you have any questions or comments about this notice and policy, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please do not hesitate to contact us via our Knowledge Center, or at the following address:

Alpha Exploration Co. Inc.  
548 Market Street PMB 72878  
San Francisco, California 94104  
USA

**Thank you for using Clubhouse!**



# Notice to European and Brazilian Data Subjects

*Last updated February 4, 2023*

This privacy notice (“**Notice**”) supplements the [Privacy Policy](#) with additional information for EU and UK data subjects pursuant to EU and UK data protection laws (“**GDPR**”), and for Brazilian data subjects, pursuant to Brazilian data protection laws (“**LGPD**”). For a full description of how we use your personal data, you should read this notice together with the Privacy Policy.

**Controller and Representative.** Alpha Exploration Co. (trading as Clubhouse) is responsible for how your personal data is handled. This means we are the controller of your personal data under the GDPR. You can find our contact information in the “Contact Us” section listed in our [Privacy Policy](#).

We have also appointed representatives in the EEA, Switzerland and the UK. If you are located in the EEA, Switzerland or the UK, you can contact the relevant representative about our processing of your personal data:

- EEA and Switzerland: VeraSafe Ireland Ltd., which you can contact:
  - **by email:** [article27@verasafe.com](mailto:article27@verasafe.com)
  - **by post:** Unit 3D North Point House, North Point Business Park, New Mallow Road, Cork, T23AT2P, Ireland;
- UK: VeraSafe United Kingdom Ltd., which you can contact:
  - **by email:** [article27@verasafe.com](mailto:article27@verasafe.com)
  - **by post:** 37 Albert Embankment, London SE1 7TL, United Kingdom

**Personal Data We Collect From You and How We Use It.** You can read about the personal data we collect from you in the “Information We Collect” section in our Privacy Policy above (including personal data we may receive from third parties – see “Information From Third Parties” section above), and how we use it in the “How We Use The Information We Collect” section above.

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

We can collect personal data of minors under 18, who in any case are of age under applicable privacy law (i.e. we only collect data of minors aged 16).

**Justification for Data Processing.** EU, UK, and Brazilian data protection law sets out a list of justifications on which companies may rely to process personal data, and requires

companies to explain to consumers the specific justifications for the company’s data processing activities. Clubhouse generally relies on one or more of the following justifications to process personal data:

- **Contractual Necessity**, to provide you with the Products in accordance with our [Terms of Service](#) or otherwise perform a contract we have entered into with you or are about to enter into with you.
- **Legitimate Interests**, where it is necessary for our legitimate business purposes, your interest or the interests of a third party, and your interests and fundamental rights do not override those legitimate interests.
- **Consent**, where required by law. Where we rely on your consent to process personal data about you, you have the right to later withdraw your consent in the manner indicated when you consent or by contacting us as described in this Privacy Policy.
- **Legal obligation**, where we need to comply with a legal obligation to which we are subject.

The table below sets out a description of all the ways we use your personal data, and which of the justifications we rely on to do so. We have also identified what our legitimate interests are where we rely on that justification for processing. Note that provision of some of the following data is necessary to establish an account on Clubhouse.

### Justifications for Data Processing

Purpose	Type of Personal Data	Justification for Processing Personal Data	Data Retention Period
Create and maintain your account	Account Information	Contractual Necessity	Until account is deleted by user
Verify your identity to secure your account and the accuracy of your information	Account Information	Contractual Necessity	Until account is deleted by user
Create a profile that enables other users to find you and	Account Information, Bio Information	Contractual Necessity	Until account is deleted by user

invite you to Rooms			
Operate and maintain our Products	Account Information, Bio Information, Usage and Activity Information	Contractual Necessity	Until account is deleted by user
Develop and improve our Products	Account Information, Bio Information, Interests, Usage and Activity Information	Legitimate Interests: To create better Products for our users	Until account is deleted by user
Share information about our Products and tell you what's happening on Clubhouse.	Account Information	Contractual Necessity	Until account is deleted by user
Respond to your inquiries (including any rights requests)	Account Information, Other Communications	Contractual Necessity  Legitimate Interests: Providing you with the support that you request, and improving our Products and related services  Legal obligation: complying with data subject rights requests	Until account is deleted by user

Maintain records of user suspensions	Account Information	Legitimate Interests: Addressing violations of our <a href="#">Terms of Service</a> or our <a href="#">Community Guidelines</a>	Retained for the duration that we offer the Product]
Enable users to sync their contacts to allow them to invite friends to use our Products	Contacts (hash values derived from telephone numbers of contacts)	Legitimate Interests: Enabling users to find one another and connect with people they know Enhancing user experience	Cryptographic hash values derived from the phone numbers are stored as long as the user instructs us to sync relevant contacts.
Enable users to sync their contacts to allow Clubhouse to connect users to one another	Contacts (hash values derived from telephone numbers of contacts)	Legitimate Interests: Enabling users to find one another and connect with people they know Enhancing user experience	Cryptographic hash values derived from the phone numbers are stored as long as the user instructs us to sync relevant contacts.
Enable users to invite friends to join Clubhouse by entering their	Contacts (hash values derived from telephone numbers of contacts)	Legitimate Interests: Enabling users to find one another	No longer than 14 days

phone numbers manually		and connect with people they know Enhancing user experience	
Enable users to invite friends to specific clubs or houses by entering the phone number manually	Contacts (hash values derived from telephone numbers of contacts)	Legitimate Interests: Enabling users to find one another and connect with people they know Enhancing user experience	No longer than 180 days
Log in authentication (based on your phone number)	Account Information Log Data And Device Information (Authentication attempts and successful authentications)	Contractual Necessity	Until account is deleted by user
Personalize your experience by suggesting rooms, houses, clubs, or other content we think you might like	Usage and Activity Information (including interests)	Legitimate Interests: To provide a more personalized experience to our users	Until account is deleted by user
Personalize your experience by suggesting users you might like to follow.	Usage and Activity Information	Legitimate Interests: To provide a more personalized experience to our users	Until account is deleted by user

Suggesting your profile to other users who might like to follow you	Usage and Activity Information	Legitimate Interests: To provide a more personalized experience to our users	Until account is deleted by user
Enable you to communicate easily with other users while using the Products	Direct Messages to and from Other Users	Contractual Necessity	Until account is deleted by user
Enable you to communicate easily with other users while using the House Chat	Messages	Contractual Necessity	No longer than 31 days
Enable you to communicate easily with other users while using Room Chat in Replay-enabled Rooms	Messages	Contractual Necessity	Until the room creator instructs us to remove the Replay or deletes their account
Enable you to communicate easily with other users while using Room Chat in non-Replay-enabled rooms	Messages	Contractual Necessity	Deleted after 2 years

<p>Investigate Trust and Safety violations as described under the “Information We Collect” section of the <a href="#">Privacy Policy</a></p>	<p>Conversations</p>	<p>Legitimate Interests:  Detecting and combating harmful or unauthorized conduct, and promoting a trusting and safe environment in our Products  Complying with legal requirements, assisting law enforcement, and enforcing or exercising our rights under our <a href="#">Terms of Service</a> or our <a href="#">Community Guidelines</a></p>	<p>Conversations, complaints and flagged recordings: 60 days for initial Trust and Safety investigations, but we may keep longer if necessary under our legal justifications   Recordings, if nothing is flagged: shortly after the room ends, usually within 10 minutes</p>
<p>Allow room creators to share audio recordings using the Replays functionality, as described under the “Information We Collect” section of the <a href="#">Privacy Policy</a> and section 3.C of our Terms of Service.</p>	<p>Conversations</p>	<p>Contractual Necessity</p>	<p>Until the room creator instructs us to remove the Replay or deletes their account</p>

<p>Allow users to record portions of conversations using the Clips functionality, as described under the “Information We Collect” section of the Privacy Policy and Section 3.C of our Terms of Service.</p>	<p>Conversations</p>	<p>Contractual Necessity</p>	<p>Clips are not transmitted to Clubhouse or stored by Clubhouse. Rather, Clips are saved on the users’ local devices, and it is up to users to decide how long they will retain any Clips they record.</p>
<p>Allow users to submit complaints to Clubhouse about potential violations of our Community Guidelines</p>	<p>Account information, Other Communications</p>	<p>Legitimate Interests: Enabling us to prevent and detect harmful or unauthorized conduct</p>	<p>Retained for the duration that we offer the Products</p>

Allow users to provide feedback about our Products, submit questions about our Products, or request help using our Products	Account information and Other Communications	Legitimate Interests: Enabling us to prevent and detect harmful or unauthorized conduct Improving and developing our Products and developing new features and services. For example, we may decide to build a new feature in response to feedback received from users	Tickets are permanently stored in Zendesk, but archived after 120 days. However, if a user deletes a ticket, that data will not be permanently stored in the system. For more information on ticket deletion, see the <a href="#">Zendesk Data Deletion Policy</a> .
Authorize Stripe to process your transactions with other users or with us	Payment and Transaction Information	Contractual Necessity	Retained until the user requests account deletion
Authenticate your identity	Social Media Information	Legitimate Interests: Enhancing user experience	Until authentication is complete, after which we only retain the data necessary to allow users to log in until the account is deleted
Establishment, exercise or defence of legal claims	Account Information, Biographical Information, Interests, Social Media and Contact Information, Usage	Legitimate Interests: Establishing, exercising and defending legal claims	In accordance with legitimate requests from competent authorities; otherwise, 10 years

and Activity  
Information,  
Conversations,  
Messages, Other  
Communications,  
Payment and  
Transaction  
Information,  
Contacts, Log Data  
and Device  
Information, Cookie  
Information

**Recipients of Data.** We may disclose your personal data to the recipients described in the “How We Disclose The Information We Collect” section in our Privacy Policy above. You can find an up-to-date list of the third party service providers we employ to process personal information on our behalf [here](#).

**Retention of Data.** To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. For further information, please see the "How Long We Keep Personal Information" section and “Data retention period” in the section “Justification for data processing” in the Privacy Policy.

**Storage and Transfer.** We are based in the United States and rely on third-party cloud storage providers that store user data on our behalf in the United States. The United States may have data protection laws less stringent than or otherwise different from the laws in effect in Europe. We may also use third-party service providers located outside of the EU or the UK. If we transfer your personal data out of the EU or the UK, we take measures to protect the confidentiality and security of your personal data, and your rights as a data subject.

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further information, you can review EU adequacy decisions [here](#), and you can review UK adequacy decisions [here](#).

- If we transfer your personal data to a country that is not deemed to provide an adequate level of data protection, in order to protect your personal data we may use contractual clauses approved for use in the EU and/or UK in accordance with the EU and/or UK data protection regime(s).

**If you fail to provide personal data.** Where we need to collect personal data by law, or to perform our contractual obligations to you under the Terms of Service, and you fail to provide that data when requested, we may not be able to provide our Products to you.

**Your Rights.** The GDPR and the LGPD grant EU, UK, and Brazilian data subjects the following rights:

- **Access.** You can request a copy of the personal data that we maintain about you. If you require additional copies, we may need to charge a reasonable fee.
- **Deletion and Correction.** You can ask us to delete or correct the personal data that we hold about you. You also have the right to ask us to delete your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to delete your personal data to comply with local law. We may not always be able to comply with your request for deletion for specific legal reasons which we will tell you about at the time of your request.
- **Objection to Processing.** You may have the right to object to how we use your personal data. For example, this may apply where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.
- **Restrict Processing.** You may ask us to suspend our processing of your personal data in the following scenarios: (i) if you want us to establish its accuracy, (ii) if our use of the data is unlawful but you do not want us to erase it, (iii) if you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Portability.** If required to do so, we will give you your personal data in a structured, commonly used, and machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdrawal of Consent.** Insofar as we rely on consent as the lawful basis on which we process your personal data, you can withdraw your consent to process that personal data at any time. This will not, however, affect the lawfulness of any

processing carried out before you withdraw your consent, or the processing of any personal data for which we rely on a basis other than consent.

To exercise these rights, please email [legalrequest@clubhouse.com](mailto:legalrequest@clubhouse.com), or visit <http://support.clubhouse.com>. In addition to contacting Clubhouse as your data controller, you may also contact our representative using the contact information referenced in the “Controller and Representative” section above. You also have the right to complain to a data protection authority in your country about our processing of your personal data.

**Thank you for using Clubhouse!**

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## Information For Europeans Data Subjects Who Have Not Used Our Products

*Last updated February 4, 2023*

### **Non-User Data Notice**

If you have not set up an account, or used our Products as a guest after agreeing to our terms and conditions, (a “**Non-User**” or “**you**”), Clubhouse may process your phone number if a Clubhouse user has your phone number saved in the contact list stored in their device and chooses to share those contacts with Clubhouse, or sends you an invitation by typing in your phone number. This Notice provides information about our use of Non-User data to data subjects in the EU and the UK.

### **What information about Non-Users does Clubhouse store?**

As noted in our [Privacy Policy](#), Clubhouse users can choose to sync their contacts. This allows us to help Clubhouse users connect with people they might know, and to invite new people to Clubhouse more easily. Similarly, a user may choose to send an invitation to a specific person entering that person’s phone number. This could be an invitation to join Clubhouse, or an invitation to join a specific club, house, or room that the user thinks you might be interested in. If you are listed in the contacts of a Clubhouse user who chooses to sync contacts, or a user decides to send you an invitation by entering your phone number, we may process your phone number even if you are not a Clubhouse user.

Either way, Clubhouse does not store your phone number in a readable format. Instead we generate a cryptographic hash value derived from your phone number, and update this

information from time to time. We store the hash value in a list linked to the Clubhouse user who chose to sync contacts or send an invitation. Clubhouse does not collect names or any other information from a user's contacts.

### **What does Clubhouse do with Non-Users' Information?**

We use the hash values derived from phone numbers to help users connect with one another on Clubhouse (now or later), suggest people to invite, and send invitations. If you join Clubhouse, we will use the hash value derived from your phone number to help other Clubhouse users connect with you on Clubhouse.

### **Does Clubhouse Disclose Non-User information to third parties?**

Clubhouse does not disclose Non-User information to anyone other than our users and our third-party service providers.

### **What is Clubhouse's legal justification for processing this information?**

We rely on our legitimate interests and the legitimate interests of our users and Non-Users. More specifically, we rely on our legitimate interests in personalizing the Clubhouse Products by connecting users with people they may know on Clubhouse. We rely on the interests of our users in more efficiently connecting with people they may know on Clubhouse, and their interest in inviting others to join Clubhouse to form an even more robust community. We also rely on the interests of Non-Users in finding people they may know on Clubhouse upon joining, and gaining access to specific content on Clubhouse via invitations sent by Clubhouse users.

### **How long does Clubhouse retain Non-User information?**

When we collect Non-Users' phone numbers, we don't store them. We process them for no more than a few seconds to create cryptographic hash values derived from the phone numbers. The cryptographic hash values are stored in a list on Clubhouse servers linked to the Clubhouse users who uploaded the phone numbers from which the hash values were derived.

If a user syncs her contacts, we keep this list of hash values for as long as the user instructs us to do so.

If a user invites you to join Clubhouse by entering your phone number manually but does not invite you to join a specific club or house, we keep the hash value derived from your phone number for no more than 14 days.

If a user invites you to join a specific club or house by entering your phone number manually, we keep the hash value derived from your phone number for no more than 180 days.

### **How do Non-Users exercise their data subject rights?**

Data subjects have the right to access, rectify, and erase their information, as well as the right to restrict and object to certain processing of their personal information, in certain circumstances. You can learn more about those rights in our [Privacy Policy](#). To exercise those rights, contact us via this form or via the address provided below. You also have the right to complain to a data protection authority in your country about our processing of your personal data.

### **Storage and transfer of Non-User Data**

We are based in the United States and rely on cloud storage providers that store user data on our behalf in the United States. The United States may have data protection laws less stringent than or otherwise different from the laws in effect in Europe. We may also use service providers located outside of the EU or the UK. If we transfer your personal data out of the EU or the UK, we take measures to protect the confidentiality and security of your personal data, and your rights as a data subject.

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further information, you can review EU adequacy decisions [here](#), and you can review UK adequacy decisions [here](#).

If we transfer your personal data to a country that is not deemed to provide an adequate level of data protection, in order to protect your personal data we may use contractual clauses approved for use in the EU and/or UK in accordance with the EU and/or UK data protection regime(s).

### **Contact us**

Alpha Exploration Co. (trading as Clubhouse) is responsible for Non-User data. This means we are the controller of Non-User data under the GDPR.

If you have questions about this Data Notice, you can contact us via this [form](#), or by emailing [legalrequest@clubhouse.com](mailto:legalrequest@clubhouse.com). You can also contact us at this mailing address:

Alpha Exploration Co. Inc.  
548 Market Street PMB 72878  
San Francisco, California 94104  
USA

We have also appointed the following representatives:

- EEA and Switzerland: VeraSafe Ireland Ltd., Unit 3D North Point House, North Point Business Park, New Mallow Road, Cork, T23AT2P, Ireland; [article27@verasafe.com](mailto:article27@verasafe.com).
- UK: VeraSafe United Kingdom Ltd., 37 Albert Embankment, London SE1 7TL, United Kingdom; [article27@verasafe.com](mailto:article27@verasafe.com).

If you are located in the EEA, Switzerland or the UK, you can contact the relevant representative about our processing of your personal data, in addition to or instead of contacting us.

*Last updated February 4, 2023*