



Calibra: Customer Commitment

Introduction

Calibra will be a digital custodial wallet that enables storage and usage of the Libra digital currency. It will be available on Facebook platforms — initially WhatsApp and Messenger — and as a standalone app on iOS and Android.

Calibra, Inc. is a subsidiary of Facebook, Inc. This setup serves two purposes: first, as a provider of financial services, Calibra will be a regulated entity. Second, it reflects the importance of keeping Calibra's financial data separate from Facebook's social data (more on this below).

Calibra is committed to engaging with policymakers and other stakeholders to discuss issues on data privacy and related topics. **This document is intended to provide initial guidance for interested audiences and will be replaced by a comprehensive data policy prior to launch.**

Calibra's Approach to Consumer Data Privacy

Calibra is being designed with a strong commitment to protecting customer privacy. We believe that customers hold rights to their data and should have simple, understandable, and accessible data-management controls.

- Aside from limited cases, **Calibra will not share account information or financial data with Facebook, Inc. or any third party without customer consent. For example, Calibra customers' account information and financial data will not be used to improve ad targeting on the Facebook, Inc. family of products.** The limited cases where this data may be shared reflect our need to keep people safe, comply with the law, and provide basic functionality to the people who use Calibra. For example:
 - **Preventing fraud and criminal activity.** Information may be shared to prevent malicious activity, such as instances of fraud, security threats, or criminal activity.
 - **Compliance with the law.** Data may be shared to comply with legal or regulatory requirements, including sharing with law enforcement, regulators, and/or government officials, or in response to a valid legal request.
 - **Payment processing and service providers.** When you authorize a payment, we share data with third parties necessary to process that transaction. We also share Calibra customer data with managed vendors and service providers — including Facebook, Inc. — that support our business (e.g., to provide technical infrastructure or direct payment processing). In both cases, we share only the Calibra customer data that is necessary for completing the defined activity or service.
 - **Aggregated data:** Calibra may share aggregated data to Facebook, Inc. or third parties relating to the performance of its products and services. An example of this is a chart showing the total number of users of the service. Calibra will use techniques to prevent the aggregated data from being connected back to an individual.

- Calibra will use Facebook, Inc. data to comply with the law, secure customers' accounts, mitigate risk, and prevent criminal activity. Beyond these cases, if a Calibra product feature can be personalized or improved with data from Facebook, **we will first obtain customers' consent to share the relevant data with Calibra.**
 - For example, people may choose to import their Facebook friend list into Calibra to make sending money easier. This import will **not be automatic** — we will obtain in-product customer consent.
- Calibra will use **aggregated** Facebook, Inc. data that is not linked to your Calibra account to improve the Calibra product.
 - For example, we may use Facebook, Inc. data to see which regions have broader internet adoption.
- Calibra will use customer data to facilitate and improve the Calibra product experience, market Calibra products and services, comply with legal and regulatory obligations, and ensure safety, security, and integrity. We may also use customer data to conduct research projects related to financial inclusion and economic opportunity with, for example, academic institutions and NGOs, though any published results will only contain aggregated statistics.
- Calibra will be transparent by offering customers choice and control using clear, simple language and easy-to-find privacy controls that detail what data is collected, used, and shared, and for what purposes.
- Calibra believes that control over an individual's data doesn't stop at data use and that customers should be able to use their data for their own purposes and with other services. In compliance with data protection principles and regulations, and where technically feasible, Calibra is committed to finding ways in which people can obtain the personal, financial, and transactional data they provide to Calibra and take it with them to other services.

Calibra's Approach to Compliance

Calibra is committed to keeping illicit activity off the platform and working with law enforcement globally.

- Calibra will conduct a risk assessment on the basis of guidelines issued by the Financial Action Task Force (FATF), the global standard-setting body for Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT), as well as applicable regulators. The risk assessment will identify the threats and vulnerabilities of Calibra and craft a thoughtful and robust response including oversight structures, controls implementations, monitoring, and audits.
- Calibra is building a robust global compliance and risk-management program to fulfill its applicable obligations:
 - Calibra will implement a robust Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) program on its platform wherever the product is available, irrespective of whether local regulations have applied AML laws to cryptocurrency wallets.
 - Calibra will not be available in jurisdictions that have banned cryptocurrencies.
 - In the U.S., Calibra has registered as a Money Service Business with the U.S. Department of the Treasury and is obtaining licenses in those U.S. states that treat cryptocurrencies as the equivalent of money in their regulation of money transmission.
 - In the EU, Calibra will operate an anti-money laundering program under the money laundering directives.
 - Calibra may integrate with cryptocurrency exchanges, but will not act as an exchange.
- Calibra will ensure compliance with AML/CFT requirements and best practices when it comes to identifying Calibra customers (know your customer [KYC] requirements) by taking the following steps:
 - Require ID verification (documentary and non-documentary).
 - Conduct due diligence on customers commensurate with their risk profile.
 - Apply the latest technologies and techniques, such as machine learning, to enhance our KYC and AML/CFT program.

- Report suspicious activity to designated jurisdictional authorities.
- Calibra will do its part to facilitate the efficacy of international sanctions regimes. We will administer and enforce applicable sanctions programs including, for example, U.S., EU, and U.N. sanctions programs.

Calibra's Approach to Consumer Protections

Authorities charged with consumer protection have an important role to play in ensuring that all consumers, including the most vulnerable, can safely take advantage of financial innovation. Calibra is committed to partnering with consumer protection authorities to ensure the safety and accessibility of its product. In addition to working with authorities to protect Calibra customers, we are also developing resources focused on protecting individual customers from undue risk on our platform. These will include:

- **Consumer protection resources:**
 - Online consumer education.
 - Clear statements of consumer rights.
 - Guidance on how and where to exchange between Libra and fiat currency.
- **Customer service resources:**
 - Applying artificial intelligence (AI) and machine learning (ML) technology to help guide customers with prompts.
 - Customer support for inquiries, assistance, and complaints.
 - Customer support available in multiple languages.
- **Anti-fraud resources:**
 - Deployment of automated fraud prevention tools that proactively monitor for fraudulent activity, supported by fraud operations personnel.
 - Protection and refunds in the event of unauthorized transactions: in the event we find an unauthorized transaction has taken place, Calibra will offer the appropriate party a full refund.
 - Dedicated team to implement mitigation measures to combat fraud and risk.

The Relationship Between Libra and Calibra

- The Libra Association is separate from Calibra and Facebook.
- The open-source software that implements the Libra Blockchain was initially built by a group of Calibra engineers. It has been contributed to the Libra Association under standard open-source terms.
- Facebook teams played a key role in the creation of the Libra Association and the Libra Blockchain, working with the other Founding Members. While final decision-making authority rests with the association, Facebook is expected to maintain a leadership role through 2019. Facebook created Calibra, a regulated subsidiary, to ensure separation between social and financial data and to build and operate services on its behalf on top of the Libra network. Once the Libra network launches, Facebook, and its affiliates, will have the same commitments, privileges, and financial obligations as any other Founding Member. As one member among many, Facebook's role in governance of the association will be equal to that of its peers.
- For background on the Libra ecosystem, please see [this introductory white paper](#).
- For a broader policy and regulatory discussion of Libra, please see [Libra's Commitment to Compliance and Consumer Protection](#).

These are the principles that will guide us as we're building Calibra. We're just getting started, and, as with any new product, we may come across challenges that we haven't anticipated. We plan to update this Customer Commitment as we prepare to launch Calibra in 2020.