Crusoe Cloud Platform Privacy Notice

This Crusoe Cloud Platform Privacy Notice ("**Privacy Notice**") describes how we collect and process your personal information in relation to our Services.

Information We Collect

Crusoe processes Customer Data and Service Data in order to provide our Services. This Privacy Notice applies solely to Service Data and **does not** apply to Customer Data.

Service Data is the personal information Crusoe collects or generates during the provision and administration of our Services, excluding any Customer Data. Service Data includes:

- **Account information.** Customer and its authorized parties may provide Crusoe with contact information like name, email, organization name, and billing address to sign up for waitlists for the Services, as well as to create and maintain the Accounts associated with Customer. Certain uses of our Services do not require an Account.
- **Payments and transactions.** We keep reasonable business records of charges, payments, and billing details and issues.
- **Settings and configurations.** We record your configuration and settings, including resource identifiers and attributes. This includes service and security settings for data and other resources.
- **Technical and operational details of your usage of the Services**. We collect information about usage, operational status, software errors and crash reports, authentication credentials, quality and performance metrics, and other technical details necessary for us to operate and maintain the Services and related software. This information may include device identifiers, identifiers from cookies or tokens, and IP addresses.
- **Your direct communications**. We keep records of your communications and interactions with us and our partners, for example, when you provide feedback or contact information, ask questions or seek technical support.

Service Data is collected directly from you or your authorized users when you join a waitlist for the Services, submit or create an Account. When you create or sign in to an Account, we may also collect information about how you arrived at our sign-up page, such as the advertisement, campaign, or link you clicked, including through cookies and similar technologies, and associate it with your Account information to measure the effectiveness of our marketing campaigns and to understand how visitors to our website go on to use the Services. In addition, we generate or automatically collect Service Data when you interact with the Services. For example, the Services may record the IP, user ID, and organization ID of an End User when they create a resource through the Services, such as a virtual machine or disk.

Why We Process Data

Crusoe processes Service Data for the following purposes:

- **Provide the Services you request.** Service Data is primarily used to deliver the Services that you request. This includes a number of processing activities that are necessary to provide the Services, including processing to bill for Services usage, to ensure Services are working as intended, to detect and avoid outages or other problems you might experience, and to secure your data and the Services you use.
- **Make recommendations to optimize use of the Services.** We may process Service Data to provide you with recommendations and tips. These suggestions may include ways to better secure your Account or data, options to reduce service charges or improve performance, and information about new or related products and features. We may communicate directly with you, such as to send you email messages about news, promotions, special offers, and general information about Crusoe products and services that may be of interest to you, unless you have opted not to receive such information. You can opt out of promotional emails at any time by using the unsubscribe link in any such email. If you opt out, we will continue to send you administrative and service-related communications. We may also evaluate your response to our recommendations.
- **Maintain and improve the Services.** We evaluate Service Data to help us improve the performance and functionality of the Services.
- **Provide and improve other services you request.** We may use Service Data to deliver and improve other services that you request, including Crusoe or third-party services that are enabled via the Services, administrative consoles and APIs.
- **Assist you.** We use Service Data when needed to provide technical support and professional services as requested by you, and to assess whether we have met your needs. We also use Service Data to improve our online support, and to communicate with you. This includes notifications about updates to the Services, and responding to support requests.
- **Protect you, our users, the public, and Crusoe**. We use Service Data to improve the safety and reliability of our Services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm our users, our customers, the public, or Crusoe. These activities are an important part of our commitment to secure our Services.
- **Comply with legal obligations**. We may need to process Service Data to comply with our legal obligations, for example, where we're responding to legal process or an enforceable governmental request, or to meet our financial record-keeping obligations.
- **Other purposes with your consent.** We may ask for your consent to process information for other purposes not covered in this Privacy Notice. You have the right to withdraw your consent at any time.

To achieve these purposes, we may use Service Data together with information we collect from other Crusoe products and services, or from your interaction with our web properties (such as https://www.crusoe.ai) and the emails we send you. We may use algorithms to recognize patterns in Service Data. Manual collection and review of Service Data may also occur, such as when you interact directly with our billing or support teams. We may aggregate and anonymize Service Data to eliminate personal details, and we may use Service Data for internal reporting and analysis of applicable product and business operations.

Where Data Is Stored

Crusoe and Crusoe's partners maintain data centers around the world, and provide the Services from these locations. Service Data may be processed on servers located outside of the country where our users and customers are located because Service Data is typically processed by centralized or regionalized operations like billing, support, and security.

Regardless of where Service Data is processed, we apply the same protections described in this Privacy Notice.

When we transfer personal information from the EEA, the UK, or from Switzerland, we rely on data transfer mechanisms such as the Standard Contractual Clauses and the International Data Transfer Agreement.

When we transfer personal information from countries other than the EEA, the UK, or Switzerland, we strive to comply with those countries' data protection and data transfer laws, such as by cooperating with that country's data protection authority or providing a written agreement.

How We Secure Service Data

We build our Services with strong security features to protect information. The insights we gain from providing our Services help us detect and automatically block security threats from ever reaching you.

We work hard to protect you and Crusoe from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We encrypt Service Data while in transit.
- We regularly review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems.
- We restrict access to personal information to Crusoe employees, contractors, and agents who need that information in order to process it for us. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

How We Share Data

We do not share Service Data with companies, organizations, or individuals outside of Crusoe except in the following cases:

- **With your consent.** We'll share Service Data outside of Crusoe when we have your consent. For example, when you use a third-party application that requests access to your information, we'll seek permission to share information with that third party.
- **With your administrators.** When you use Crusoe Cloud, your administrators authorized to manage your or your organization's account will have access to certain Service Data. For example, they may be able to:
    - View account and billing information, activity and statistics;
    - Change your account password;
    - Suspend or terminate your account access;
    - Access your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request;
    - Restrict your ability to delete or edit your information or your privacy settings
- **For external processing.** We provide information to our affiliates, partners and other trusted businesses or persons to process it for us, based on our instructions and in compliance with this Privacy Notice and other appropriate confidentiality and security measures.
- **For legal reasons.** We may share Service Data outside of Crusoe if we have a good-faith belief that access to, or use, preservation, or disclosure of the information is reasonably necessary to:
    - Comply with applicable law, regulation, legal process, or enforceable governmental request;
    - Enforce applicable agreements, including investigation of potential violations;

- Detect, prevent, or otherwise address fraud, security, or technical issues;
- Protect against harm to the rights, property or safety of Crusoe, our customers, users, and the public as required or permitted by law.

If Crusoe is involved in a reorganization, merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information becomes subject to a different privacy policy.

Access to Data

You and your organization's administrator can access the portion of Service Data used to create and maintain your Account directly from Crusoe Cloud, including your name, email, organization name, billing contact information, and payment and transaction information, as well as product and communication settings and configurations.

If you're otherwise unable to access your data, you can always request it by contacting support@crusoecloud.com.

Deletion and Retention of Data

We retain Service Data for different periods of time depending on what it is, how we use it, and how you configure your settings.

Service Data is deleted or anonymized once it is no longer needed. For each type of data and operation, we set retention timeframes based on the purpose for its collection, and ensure it is kept for no longer than necessary.

Your organization's administrator can delete the portion of Service Data used to create and maintain your Account directly from the Crusoe platform. If you have a request to delete this information, please direct it to your organization's administrator. In the rare case where this is not possible, you can email your request to privacy@crusoe.ai.

To request that we delete your information from our marketing systems, you can email your request to privacy@crusoe.ai. This will not delete your Account or the Service Data we need to provide the Services. We may keep your email address on a suppression list so that we can continue to honor your request. For more information about how we handle personal information used for marketing, see the "Your Privacy Rights and Choices" section of our Website Privacy Notice.

Crusoe deletes other Service Data once it is no longer needed. For each type of data and operation, we set retention timeframes based on the purpose for its collection, and ensure it is kept for no longer than necessary.

Sometimes we need to retain certain information for an extended period of time for legitimate business or legal purposes. For example, when Crusoe processes a payment for you, or when you make a payment to Crusoe, we'll retain data about those transactions as required for tax or accounting purposes. Other legitimate business or legal purposes that may require us to retain data include security, fraud and abuse prevention, ensuring continuity of our Services, and complying with legal or regulatory requirements.

When we delete data, we follow detailed steps to make sure that the data is securely and completely removed from our active systems or retained only in anonymized form. We take measures to ensure that our Services protect information from accidental or malicious deletion through the use of backup systems.

Using Crusoe Accounts and Products

Your Crusoe Account is your connection to Crusoe Cloud. If you interact with Crusoe Cloud using a Crusoe Account managed by an organization, then your personal information may be subject to your organization's privacy policies and processes, and you should direct privacy inquiries to your organization.

EU Privacy Standards and GDPR

If European Union (EU), UK or Swiss data protection law applies to the processing of information about you, you have certain rights, including the rights to access, correct, delete and export your information, as well as to object to or request that we restrict processing of your information.

If you want to exercise your data protection rights with regard to information we process in accordance with this Privacy Notice and are not able to do so via the tools available to you or your organization's administrator, you can always contact Crusoe at support@crusoecloud.com. And you can contact your local data protection authority if you have concerns regarding your rights under local law.

In addition to the purposes and grounds described in this Privacy Notice, we may process information on the following legal grounds:

- **Where necessary for the performance of a contract with you.** We may process your information where necessary for us to enter into a contract with you or to comply with our contractual commitments to you.
- **When we're complying with legal obligations.** We'll process your information when we have a legal obligation to do so.
- **When we're pursuing legitimate interests.** We may process Service Data based on our legitimate interests and those of third parties while applying appropriate safeguards that protect your privacy. This means that we process your information in the interests of providing the Services you request; making recommendations to optimize use of the Services, including by sending you information about Crusoe products, features, and services; maintaining and improving the Services; providing and improving other services you request; assisting you; and protecting against harm to the rights, property or safety of Crusoe, our users, our customers, and the public, as required or permitted by law.

With your consent. Where required by applicable law, we will ask for your consent before sending you promotional communications. You can withdraw your consent at any time by using the unsubscribe link in any such email. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.

California Requirements

The California Consumer Privacy Act (**CCPA**) requires specific disclosures for California residents. This Privacy Notice is designed to help you understand how Crusoe handles your information:

- We explain the categories of information Crusoe collects and the sources of that information in Information We Collect.
- We explain how Crusoe uses information in Why We Process Data.
- We explain when Crusoe may share information in How We Share Data. Crusoe does not sell your personal information.

The CCPA also provides the right to request information about how Crusoe collects, uses, and discloses your personal information. And it gives you the right to access your information and request that Crusoe delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising your privacy rights.

We provide your organization's administrator with tools described in this Privacy Notice so you can exercise these rights. If you have questions or requests related to your rights under the CCPA, please direct them to your organization's administrator. In the rare case this is not possible, you can also contact Crusoe at privacy@crusoe.ai.

The CCPA requires a description of data practices using specific categories. This table uses these categories to organize the information in this Privacy Notice.

Categories of personal information we collect

Service Data is the personal information Crusoe collects or generates during the provision and administration of our Services, excluding any Customer Data. Service Data includes:

- **Identifiers** such as your name, phone number, and address, as well as unique identifiers tied to the browser, application, or device you're using.
- **Demographic information**, such as your preferred language.
- **Commercial information** such as records of charges, payments, and billing details and issues.
- **Internet, network, and other activity information** such as device identifiers, identifiers from cookies or tokens, IP addresses, and information about usage, operational status, software errors and crash reports, authentication credentials, quality and performance metrics, and other technical details necessary for us to operate and maintain the Services and related software.
- **Geolocation data**, such as the country you're in, as may be determined by GPS or IP address, depending in part on your device and account settings.
- **Audio, electronic, visual and similar information**, such as audio recordings of your calls with our technical support providers.
- **Inferences drawn from the above**, like aggregated performance metrics for a new product feature to determine product strategy.

Business purposes for which information may be used or disclosed

Crusoe processes Service Data for the following purposes:

- **Protecting against security threats, abuse, and illegal activity.** Crusoe uses and may disclose Service Data to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our Services, Crusoe may receive or disclose information about IP addresses that malicious actors have compromised.
- **Auditing and measurement**. Crusoe uses Service Data for analytics and measurement to understand how our Services are used, to measure the effectiveness of our marketing campaigns, and to provide you and our customers with recommendations and tips, including information by email about new or related products, features, or services.
- **Maintaining our Services.** Crusoe uses Service Data to provide the Services, technical support, and other services you request, and ensure they are working as intended, for example by tracking outages or troubleshooting bugs and other issues that you report to us.
- **Product development.** Crusoe uses Service Data to improve the Services and other services you request, and to develop new features and technologies that benefit our users and customers.

- **Use of service providers.** Crusoe shares Service Data with service providers to perform Services on our behalf, in compliance with this Privacy Notice and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide technical support.
- **Legal reasons.** Crusoe also uses Service Data to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement.

Parties with whom information may be shared

We do not share Service Data with companies, organizations, or individuals outside of Crusoe except in the following cases:

- **With your consent.** We'll share Service Data outside of Crusoe when we have your consent. For example, when you use a third-party application that requests access to your information, we'll seek permission to share information with that third party.
- **With your administrators.** When you use Crusoe Cloud, your administrator authorized to manage your or your organization's account will have access to certain Service Data. For example, they may be able to:
    - View account and billing information, activity and statistics
    - Change your account password
    - Suspend or terminate your account access
    - Access your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
    - Restrict your ability to delete or edit your information or your privacy settings
- **For external processing.** We provide information to our affiliates, partners and other trusted businesses or persons to process it for us, based on our instructions and in compliance with this Privacy Notice and other appropriate confidentiality and security measures.
- **For legal reasons.** We may share Service Data outside of Crusoe if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:
    - Comply with applicable law, regulation, legal process, or enforceable governmental request.
    - Enforce applicable agreements, including investigation of potential violations.
    - Detect, prevent, or otherwise address fraud, security, or technical issues.
    - Protect against harm to the rights, property or safety of Crusoe, our customers, users, and the public as required or permitted by law.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time. We will not make any significant changes without notifying you in advance by posting a prominent notice on this page describing the changes or by sending you a direct communication. We encourage you to regularly review this Privacy Notice, and we will always indicate the date the last changes were published.