

NATIONAL COMPUTE PRIVACY NOTICE

Last Updated: October 6, 2026

This Privacy Notice explains how National Compute Labs PBC ("**National Compute**") collects, uses, discloses, and otherwise processes personal data in connection with the National Compute Platform, as well as any specific service or application that National Compute references or links to this Privacy Notice.

This Privacy Notice does not address our privacy practices relating to National Compute job applicants, employees and other employment-related individuals, nor data that is not subject to applicable data protection laws (such as deidentified or publicly available information in certain jurisdictions). This Privacy Notice is also not a contract and does not create any legal rights or obligations not otherwise provided by law.

Our Role in Processing Personal Data

Data protection laws sometimes differentiate between "controllers" and "processors" of personal data. A "controller" determines the purposes and means (the why and how) of processing personal data. A "processor," which is sometimes referred to as a "service provider," processes personal data on behalf of a controller subject to the controller's instructions.

This Privacy Notice describes our privacy practices where we are acting as the controller of personal data. However, this Privacy Notice does not cover or address how our customers may process personal data when they use our services, or how we may process personal data on their behalf in accordance with their instructions where we are acting as their processor. For example, National Compute primarily acts as a processor when handling data that its customers upload into, or transmit through, its services for processing via purchased compute pursuant to our Terms of Service.

As a result, we recommend referring to the privacy notice of the customer with which you have a relationship for information on how they engage processors, like us, to process personal data on their behalf. In addition, we are generally not permitted to respond to individual requests relating to personal data we process on behalf of our customers, so we recommend directing any requests to the relevant customer.

If you access our services or otherwise interact with us from the European Economic Area, United Kingdom, or Switzerland, please see the [Controller Details and Privacy Contacts](#) section of our [Additional European Economic Area, United Kingdom, and Switzerland Privacy Disclosures](#) for more information about our legal entities operating as the controllers of your personal data.

Our Collection and Use of Personal Data

The categories of personal data we collect depend on how you interact with us and our services. For example, you may provide us your personal data directly when you sign up for our newsletter, register for an account, use our services, purchase or use credits, post a review, participate in an event, contest, promotion or survey or otherwise contact us or interact with us.

We also collect personal data automatically when you interact with our websites and other services and may also collect personal data from other sources and third parties.

Personal Data Provided by Individuals

We collect the following categories of personal data individuals provide us:

- **Contact Information**, including first and last name, phone number, email address, mailing address, and communication preferences. We use this information primarily to fulfill your request or transaction, to communicate with you directly, and to send you marketing communications in accordance with your preferences.
- **Professional Information**, including job title, company name, professional background, and the nature of your relationship with us. We use this information primarily to fulfill your request or transaction, to determine how we

communicate with you, to administer your account, to provide you with our services, and for customer support purposes.

- **Account Information**, including first and last name, email address, phone number, username, account credentials or one-time passcodes, credits purchased or otherwise obtained, platform bidding activity (including bids placed for compute and applicable spending limits), and the services you are interested in, purchased, or have otherwise used. We use this information primarily to administer your account, provide you with our services, communicate with you regarding your account and your use of our services, and for customer support purposes.
- **Payment Information**, including payment card information, billing address, and other financial information (such as, routing and account number). Please note that we use third-party payment providers, including Stripe, to collect and process payments made to us. We do not receive or retain any personally identifiable financial information, such as payment card number, you provide these third-party payment providers in connection with payments. Rather, all such information is provided directly by you to our third-party payment providers. The payment provider's use of your personal data is governed by their privacy notice. To view Stripe's privacy policy, please click [here](#).
- **Event, Contest, Promotion, and Survey Information**, including information provided when you sign up for an event, enter a contest or promotion, complete a survey or submit a testimonial. We use this information primarily to administer and facilitate our services, respond to your submission, communicate with you, conduct market research, inform our marketing and advertising activities, improve and grow our business, and facilitate the related event, contest, promotion, or survey.
- **Interaction, Feedback and Support Information**, including the contents of custom messages sent through the forms, agent and chat platforms, including any available online live chat or automated agent or chat functions, email addresses, or other contact information we make available to customers, as well as recordings of calls or meetings with us, where permitted by law (including through the use of automated or artificial intelligence tools provided by us or our third-party providers). We use this information primarily to provide our services, to investigate and respond to your inquiries, to communicate with you via online chat, email, phone, text message or social media, and, where permitted by law and our agreement with you, to improve our services.

Personal Data Automatically Collected

We, and our third-party partners, automatically collect information you provide to us and information about how you access and use our services when you engage with us. We typically collect this information through the use of a variety of our own and our third-party partners' automatic data collection technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. Information we collect automatically about you may be combined with other personal data we collect directly from you or receive from other sources.

We, and our third-party partners, use automatic data collection technologies to automatically collect the following data when you use our services or otherwise engage with us:

- **Information About Your Device and Network**, including the device type, manufacturer, and model, operating system, IP address, browser type, Internet service provider, and unique identifiers associated with you, your device, or your network (including, for example, a persistent device identifier). We employ third-party technologies designed to allow us to recognize when two or more devices are likely being used by the same individual and may leverage these technologies (where permitted by law) to link information collected from different devices.
- **Information About the Way Individuals Use Our Services and Interact With Us**, including the site from which you came, the site to which you are going when you leave our services, how frequently you access our services, whether you open emails or click the links contained in emails, whether you access our services from multiple devices, and other browsing behavior and actions you take on our services (such as the pages you visit, the content you view, videos you watch, the communications you have through our services, the instructions and prompts you provide available artificial intelligence agents and how those instructions and prompts are processed, and the content and links you interact with). We employ third-party technologies designed to allow us to collect detailed information about browsing behavior and actions that you take on our services, which may record your mouse movements, scrolling, clicks, and keystroke activity on our services and other browsing, search or purchasing behavior. These third-party technologies may also record information you enter when you interact with our services, or engage in chat features or other communication platforms we provide.
- **Information About Your Location**, including general geographic location that we or our third-party providers may derive from your IP address.

All of the information collected automatically through these tools allows us to improve your experience. For example, we may use this information to enhance and personalize your customer experience, to monitor and improve our services, to offer communications features such as live and automated chat, and to improve the effectiveness of our services, offers, advertising, communications and customer service. We may also use this information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our services.

For information about the choices you may have in relation to our use of automatic data collection technologies, please refer to the [Your Privacy Choices](#) section below. For additional details about the cookies we use on our websites and to adjust your preferences with regard to those cookies, please visit our “Cookie Settings” manager linked in the footer of our website.

Personal Data from Other Sources and Third Parties

We may receive the same categories of personal data as described above from the following sources and other parties:

- **Our Affiliates:** For the purposes of providing and developing our services, we may receive personal data about you from other legal entities within our group of companies (including our parent company, AMP Infra PBC).
- **Single Sign-On:** We may provide you the ability to log in to our services through certain third-party accounts you maintain. When you use these single sign-on protocols to access our services, we do not receive your login credentials for the relevant third-party service. Instead, we receive tokens from the single sign-on protocol to help identify you in our system (such as by your username) and confirm you successfully authenticated through the single sign-on protocol. This information allows us to more easily provide you access to our services.
- **Employers:** If you interact with our services in connection with your employment, we may obtain personal data about you from your employer or another company for which you work. For example, we may obtain your contact information from your employer to allow us to communicate with you about your employer’s customer relationship with us.
- **Other Customers:** We may receive your personal data from our other customers. For example, a customer may provide us with your contact information as a part of a referral.
- **Social Media:** When you interact with us through social media networks, such as when you follow us or share our content on social networks, we may receive some information that you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network, and may include profile information, username, and any other information you permit the social network to share with third parties. You should always review and, if necessary, adjust your privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information primarily to communicate directly with you, such as to send you messages about features that may be of interest to you.
- **Service Providers:** Our service providers that perform services on our behalf, such as analytics providers, collect personal data and often share some or all of this information with us. For example, we receive personal data about how you use our website from our analytics providers.
- **Other Sources:** We may also collect personal data about you from other sources, including publicly available sources, third-party data providers, or through transactions such as mergers and acquisitions.
- **Inferences:** We may generate inferences or predictions about you and your interests and preferences based on the other personal data we collect and the interactions we have with you.

Additional Uses of Personal Data

In addition to the primary purposes for using personal data described above, we may also use personal data we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to facilitate payment for our services, or to deliver the services requested;
- Manage our organization and its day-to-day operations;
- Communicate with you, including via email, text message, chat, social media and/or telephone calls;

- Facilitate the relationship we have with you and, where applicable, the company you represent;
- Request you provide us feedback about our service offerings;
- Create and maintain accounts for our customers;
- Register you for and provide you access to events, contests, sweepstakes, and surveys;
- Market our services to you;
- Administer, improve, and personalize our services, including by recognizing you and remembering your information when you return to our services;
- Develop, operate, improve, maintain, protect, and provide the features and functionality of our services;
- Identify and analyze how you use our services;
- Infer additional information about you from your use of our services, such as your interests;
- Create aggregated or de-identified information that cannot reasonably be used to identify you, which information we may use for purposes outside the scope of this Privacy Notice;
- Conduct research and analytics on our customer base and our services, including to better understand the demographics of our customers;
- Improve and customize our services to address the needs and interests of our customer base and other individuals we interact with;
- Test, enhance, update, and monitor the services, or diagnose or fix technology problems;
- Help maintain and enhance the safety, security, and integrity of our property, services, technology, assets, and business;
- Defend, protect, or enforce our rights or applicable contracts and agreements (including our [Terms of Service](#)), as well as to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Detect, prevent, investigate, or provide notice of security incidents or other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of National Compute and others;
- Facilitate business transactions and reorganizations impacting the structure of our business;
- Comply with contractual and legal obligations and requirements;
- Fulfill any other purpose for which you provide your personal data, or for which you have otherwise consented.

Where you choose to use National Compute’s infrastructure engineering agent powered by artificial intelligence to help you manage compute through plain-language prompts and instructions (our Marshall Agent), National Compute may also access and use personal data input into or made available to the Marshall Agent, as well as personal data contained in the information or recommendations produced by the Marshall Agent, to evaluate, train, fine-tune, or otherwise improve the Marshall Agent in accordance with your or, where applicable, your organization’s designated permissions. Additional information about the use of personal data and other information for the improvement of the Marshall Agent is available in Section 2.2(C) of our [Terms of Service](#).

Our Disclosure of Personal Data

We disclose or otherwise make available personal data in the following ways:

- **To Our Affiliates:** For the purposes of providing and developing our services, we may share personal data about you with other legal entities within our group of companies (including our parent company, AMP Infra PBC).
- **To Your Employer:** If you interact with our services in connection with your employment, we may disclose personal data to your employer or another company for which you work. For example, we may provide information to your employer about your usage of our services in connection with your work for them.
- **To Service Providers:** We engage other third parties to perform certain services on our behalf, such as hosting and artificial intelligence inferencing, in connection with the uses of personal data described in the sections above.

Depending on the applicable services, these service providers may process personal data on our behalf or have access to personal data while performing services on our behalf.

- **To Other Businesses as Needed to Provide Services:** We may share personal data with third parties you engage with through our services or as needed to fulfill a request or transaction including, for example, payment processing services.
- **In Connection with a Business Transaction or Reorganization:** We may take part in or be involved with a business transaction or reorganization, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose, transfer, or assign personal data to a third party during negotiation of, in connection with, or as an asset in such a business transaction or reorganization. Also, in the unlikely event of our bankruptcy, receivership, or insolvency, your personal data may be disclosed, transferred, or assigned to third parties in connection with the proceedings or disposition of our assets.
- **To Facilitate Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us;
 - to protect the health and safety of us, our customers, or any person; or
 - as otherwise required by applicable law.
- **With Your Consent or Direction:** We may disclose your personal data to certain other third parties or publicly with your consent or direction. For example, with your permission, we may post your testimonial on our websites.

Your Privacy Choices

Communication Preferences

- **Email Communication Preferences:** You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in any of our email communications. Please note you cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).
- **Phone Communication Preferences:** You can stop receiving promotional phone communications from us by informing the caller you no longer wish to receive promotional phone calls from us, following the instructions provided on the call for opting out of promotional phone calls (where available), or replying STOP to any one of our promotional text messages. Please note we may need to continue to communicate with you via phone for certain service-related messages (such as, sending a verification code to your phone via call or text for purposes of verifying the authenticity of a log-in attempt).
- **Push Notification Preferences:** You can stop receiving push notifications from us by changing your preferences in your device’s notification settings menu or in the applicable service-specific application. Please note we do not have any control over your device’s notifications settings and are not responsible if they do not function as intended.
- **Direct Mailing Preferences:** You can stop receiving promotional direct mail communications from us by contacting us as set forth in the [Contact Us](#) section below. Please note this opt-out does not affect any mailings that are controlled by third parties that may feature or mention our services.

Marshall Agent Permissions

Where you choose to use National Compute's infrastructure engineering agent powered by artificial intelligence to help you manage compute through plain-language prompts and instructions (our Marshall Agent), National Compute may access and use personal data input into or made available to the Marshall Agent, as well as personal data contained in the information or recommendations produced by the Marshall Agent, to evaluate, train, fine-tune, or otherwise improve the Marshall Agent in accordance with your or, where applicable, your organization's designated permissions. You may change the applicable designated permissions through your account settings or via direct request to your organization's administrator or National Compute. Additional information about the use of personal data and other information for the improvement of the Marshall Agent is available in Section 2.2(C) of our [Terms of Service](#).

Withdrawing Your Consent

Where we have your consent for the processing of your personal data (e.g., when you opt in to receive certain types of marketing communications from us), you may withdraw your consent by following the instructions provided when your consent was requested or by contacting us as set forth in the [Contact Us](#) section below.

Automatic Data Collection Preferences

You may use the "Cookie Settings" manager linked in the footer of our website to adjust your preferences regarding certain automatic data collection technologies on the specific website you are visiting for the specific device and browser you are using at that time (which means you will need to change your preferences on each device and browser you use to interact with the specific website you are visiting).

You may also be able to utilize third-party tools and features to restrict our use of automatic data collection technologies. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking automatic data collection technologies through third-party tools and features may negatively impact your experience using our services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

Modifying or Deleting Your Personal Data

If you have any questions about reviewing, modifying, or deleting your personal data, you can contact us as set forth in the [Contact Us](#) section below. We may not be able to modify or delete your personal data in all circumstances.

Partner-Specific Preferences

Certain of our third-party providers and partners offer additional ways that you may exercise control over your personal data, or automatically impose limitations on the way we can use personal data in connection with the services they provide:

- **Google Analytics:** Google Analytics allows us to better understand how our customers interact with our services. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website here: www.google.com/policies/privacy/partners/. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Add-On here: <https://tools.google.com/dlpage/gaoptout/>.

Children's Personal Data

Our services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 13. If an individual is under the age of 13, they should not use our services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 13 has provided personal data to us, we encourage the child's parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a child under the age of 13, we will promptly delete that personal data.

Retention of Personal Data

We will usually retain the personal data we collect about you for no longer than reasonably necessary to fulfil the purposes for which it was collected, and in accordance with our legitimate business interests and applicable law. However, if necessary, we may retain personal data for longer periods of time as required under applicable law or as needed to resolve disputes or protect our legal rights.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations.

Once retention of the personal data is no longer reasonably necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if that is not possible (for example, because personal data has been stored in backup archives), we will securely store the personal data and isolate it from further active processing until deletion or deidentification is possible.

Security of Personal Data

We have implemented reasonable physical, technical, and organizational safeguards that are designed to protect your personal data. In addition, we take steps designed to ensure any third party with whom we share personal data provides a similar level of protection. However, despite these controls, we cannot completely ensure or warrant the security of your personal data.

Third-Party Websites and Services

Our websites and other services may include links to or redirect you to third-party websites, plug-ins, applications, or other services, including social media services where you may connect with us. Third-party websites and other services may also reference or link to our websites and services. This Privacy Notice does not apply to any personal data practices of these third-party websites, plug-ins, applications, or other services. To learn about these third parties' personal data practices, please visit their respective privacy notices.

Region-Specific Disclosures

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal data about residents of certain countries, regions or states. Please refer below for disclosures that may be applicable to you:

- **California:** If you are a resident of the State of California in the United States, please click [here](#) for additional California-specific privacy disclosures, including a description of the personal data rights made available to California residents.
- **European Economic Area, United Kingdom or Switzerland:** If you are located in the European Economic Area (Member States of the European Union together with Iceland, Norway, and Liechtenstein), the United Kingdom, or Switzerland, please click [here](#) for additional European-specific privacy disclosures, including a description of the personal data rights made available to individuals located in those jurisdictions under applicable law.

Updates to This Privacy Notice

We may update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify individuals by email to their registered email address, by prominent posting on this website or our other platforms, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

Contact Us

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please contact us at: privacy@nationalcompute.com.

ADDITIONAL CALIFORNIA PRIVACY DISCLOSURES

These disclosures supplement the information contained in our [Privacy Notice](#) by providing additional information about our personal data processing practices relating to individual residents of the State of California in the United States. For a detailed description of how we collect, use, disclose, and otherwise process personal data, please read our [Privacy Notice](#).

California Categories of Personal Information

California law requires we provide disclosures to you about what “personal information” we collect by reference to the enumerated categories of “personal information” set forth within California law. To address this obligation, we have identified the relevant enumerated California “personal information” category for the personal data described in the [Our Collection and Use of Personal Data](#) section of our [Privacy Notice](#) below:

- **Identifiers**, such as name, username, account credentials or one-time passcodes, IP address and other unique personal identifiers.
- **Customer records**, such telephone number, email address, mailing address and payment card information.
- **Commercial information**, such as credits purchased or otherwise obtained, platform bidding activity (including bids placed for compute and applicable spending limits) and service interests and engagement.
- **Internet / network information**, such as information about your device and network, and information about the way you use our Service and how you otherwise interact with us.
- **Geolocation data**, such as general geographic location based on log data.
- **Sensory information**, such as recordings of audio, where permitted by law.
- **Professional / employment information**, such as job title, company name, professional background, and the nature of your relationship with us.
- **Sensitive Personal information**, such as account credentials or one-time passcodes and payment card or bank account information (solely handled by our payment processors).
- **Other Personal information**, such as communication preferences, information provided when you sign up for an event, enter a contest or promotion, complete a survey or submit a testimonial and any inquiries, requests, or comments you otherwise choose to send us.
- **Inferences**, such as deriving your interests and preferences from other personal information we have collected.

Disclosures, Sales and Targeted Advertising

We disclose all of the categories of personal information we collect to the categories of recipients set forth in the [Our Disclosure of Personal Data](#) section of our [Privacy Notice](#). However, we do not sell personal information, and we do not process or otherwise share personal information for the purpose of displaying advertisements that are selected based on personal information obtained or inferred over time from an individual’s activities across non-affiliated businesses or websites, applications, or other services (otherwise known as “**targeted advertising**” or “**cross-context behavioral advertising**”).

Sensitive Personal Information

The following personal information elements collected in connection with our services may be classified as “sensitive” under certain California law:

- Account credentials or one-time passcodes; and
- Payment card or bank account information (solely handled by our payment processors).

We only use or disclose sensitive personal information where reasonably necessary and proportionate for the purposes of providing and performing services you have requested, verifying and improving the services we provide, detecting security

incidents, fraud, and other illegal actions, ensuring the physical safety of natural persons, performing services on behalf of the business, or short-term transient use. We only collect and process sensitive personal information without the purpose of inferring characteristics about the relevant individual, and we do not sell sensitive personal information or process or otherwise share sensitive personal information for the purpose of targeted advertising.

Deidentified Information

We may at times receive, or process personal information to create, deidentified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain deidentified information, we will maintain and use the information in deidentified form and not attempt to reidentify the information except as required or permitted by law.

Automated Decision-Making and Profiling

We do not conduct automated processing of personal information for the purposes of evaluating, analyzing, or predicting an individual's personal aspects in furtherance of decisions that produce legal or similarly significant effects. As a result, we do not provide a right to exercise control over such forms of automated decision-making and profiling.

Your Additional California Privacy Choices

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

- **Right to Know:** The right to confirm whether we are processing personal information about you and to obtain certain personalized details about the personal information we have collected about you, including:
 - The categories of personal information collected;
 - The categories of sources of the personal information;
 - The purposes for which the personal information were collected;
 - The categories of personal information disclosed to third parties (if any), and the categories of recipients to whom this personal information were disclosed;
 - The categories of personal information shared for targeted advertising purposes (if any), and the categories of recipients to whom the personal information were disclosed for these purposes; and
 - The categories of personal information sold (if any) and the categories of third parties to whom the personal information were sold.
- **Right to Access & Portability:** The right to obtain access to the personal information we have collected about you and, where required by law, the right to obtain a copy of the personal information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **Right to Correction:** The right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.
- **Right to Opt-Out of Sales:** The right to direct us not to sell personal information to third parties, including the right to opt-out of the disclosure of personal information to third parties for the third parties' direct marketing purposes under California's "Shine the Light" Law.
- **Right to Deletion:** The right to have us delete personal information we maintain about you.

You also have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights. However, please note that if the exercise of these rights limits our ability to process personal information, we may no longer be able to engage with you in the same manner.

Submitting Privacy Rights Requests

Please submit a request specifying the right you wish to exercise by emailing us at privacy@nationalcompute.com.

Before processing your request to exercise certain rights (including the Right to Know, Access & Portability, Correction, and Deletion), we will need to verify your identity and confirm your state of residency. In order to verify your identity, we will

generally either require the successful authentication of your account, or the matching of sufficient information you provide us to the information we maintain about you in our systems.

In certain circumstances, we may decline or limit your request, particularly where we are unable to verify your identity or locate your information in our systems, or where you are not a resident of the State of California.

Submitting Authorized Agent Requests

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

ADDITIONAL EUROPEAN ECONOMIC AREA, UNITED KINGDOM, AND SWITZERLAND PRIVACY DISCLOSURES

These disclosures supplement the information contained in our [Privacy Notice](#) by providing additional information about our personal data processing practices relating to individuals who access our services or otherwise interact with us from the European Economic Area (“**EEA**”), United Kingdom (“**UK**”), and Switzerland. For a detailed description of how we collect, use, disclose, and otherwise process personal data, please read our [Privacy Notice](#).

Controller Details and Privacy Contacts

EEA, UK, and Swiss Controller

National Compute Labs PBC (“**National Compute**”, the “**Company**,” “**we**” or “**us**”), a company duly incorporated and organised under the laws of the United States, having its registered address at 1209 Orange Street, Wilmington Delaware, 19801, is the “controller” responsible for the processing of personal data in connection with our EEA, UK, and Swiss services and operations. This means National Compute determines and is responsible for how your personal data is used. You may contact us by sending an email to privacy@nationalcompute.com.

Additional Questions or Complaints

If you have a concern about our processing of personal data, you have the right to lodge a complaint with the Data Protection Authority where you reside, where you work, or where an alleged violation of the law has occurred. Contact details for applicable Data Protection Authorities can be found using the links below:

- **European Economic Area:** https://edpb.europa.eu/about-edpb/board/members_en
- **United Kingdom:** <https://ico.org.uk/global/contact-us/>
- **Switzerland:** <https://www.edoeb.admin.ch/en/contact-2>

We would, however, appreciate the chance to handle your concerns directly prior to a complaint being filed, so please contact us directly at privacy@nationalcompute.com if you have any concerns.

Purposes and Legal Bases of Processing

When we process your personal data, we will do so in reliance on the following lawful bases:

- **Contract:** Where the processing is necessary for the performance of a contract between you and us, or to take steps at your request prior to entering into a contract with you. This applies to any processing where you sign a contract with us in your capacity as an individual, for example when you become our customer or deliver services to us as a vendor or contractor. This may also include processing necessary for the performance of our [Terms of Service](#).
- **Legitimate Interest:** Where the processing is necessary for the purposes of a legitimate interest that are not overridden by your interests or fundamental rights and freedoms (e.g., to provide, maintain, and improve our services, conduct data analytics, or to pursue or defend legal claims).
- **Legal Obligation:** Where the processing is necessary to comply with our legal obligations (e.g., to maintain a record of your personal data to comply with laws and regulations related to bookkeeping, accounting, taxation, and employment).
- **Consent:** Where we have your consent for the processing (e.g., when you opt in to receive marketing communications from us or to our collection of data through non-essential cookies). When consent is the legal basis for our processing of your personal data, you may withdraw your consent at any time.

We will inform you at the point that we collect personal data from you if the provision of certain personal data is mandatory or optional for receipt of our services. If you choose not to provide us with personal data marked as required, we may not be able to provide you with a service you request.

Automated Decision-Making and Profiling

We do not conduct automated processing of personal data, including profiling, for the purposes of making decisions about you.

Retention of Personal Data

We will usually retain the personal data we collect about you for no longer than reasonably necessary to fulfil the purposes for which it was collected, and in accordance with our legitimate business interests and applicable law. However, if necessary, we may retain personal data for longer periods of time as required under applicable law or as needed to resolve disputes or protect our legal rights.

The criteria used to determine the period of time for which personal data about you will be retained varies depending on the legal basis under which we process your personal data:

- **Contract:** Where we are processing personal data based on contract, we generally will retain the information for the duration of the contract plus some additional limited period of time that is necessary to comply with law or that represents the statute of limitations for legal claims that could arise from the contractual relationship.
- **Legitimate Interest:** Where we are processing personal data based on legitimate interests, we generally will retain the information for a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of data subjects.
- **Legal Obligation:** Where we are processing personal data based on a legal obligation, we generally will retain the information for the period of time necessary to fulfill the legal obligation plus some additional limited period of time that represents the statute of limitations for legal claims that could arise from the legal obligation.
- **Consent:** Where we are processing personal data based on your consent, we generally will retain the information for the period of time necessary to fulfill the purposes for which you have provided your consent.

In certain circumstances, we may need to apply a “legal hold” that retains information beyond our typical retention period where we face threat of legal claim. In that case, we will retain the information until the hold is removed, which typically means the claim or threat of claim has been resolved. In all cases, in addition to the purposes and legal bases identified above, we consider the amount, nature and sensitivity of personal data, as well as the potential risk of harm from unauthorized use or disclosure of personal data, in determining the relevant retention period.

Once retention of the personal data is no longer reasonably necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if that is not possible (for example, because personal data has been stored in backup archives), we will securely store the personal data and isolate it from further active processing until deletion or deidentification is possible.

International Transfers of Personal Data

We operate and engage third-party partners and providers in various jurisdictions. Therefore, we and our third-party providers may transfer personal data to, or store, access, or process personal data in, a country other than the one in which it was collected, including the United States. The country to which personal data is transferred may not provide the same level of protection for personal data as the country from which it was transferred.

We may participate in transfers of personal data about you outside of the EEA, UK, and Switzerland, and when we do so we rely on appropriate or suitable safeguards recognized under applicable law, including adequacy decisions, standard contractual clauses, and the EU-US Data Privacy Framework. If you would like more information on the specific safeguards we use (and obtain a copy of such safeguards, where applicable), please contact us at privacy@nationalcompute.com.

Adequacy Decisions

We may engage in transfers of personal data about you to countries that the relevant regulatory authority has deemed to adequately safeguard personal data.

Standard Contractual Clauses

We may enter into agreements that incorporate standard contractual clauses approved under the EU GDPR, UK GDPR, or Swiss Federal Act on Data Protection when engaging in transfers of personal data to a third country that has not been deemed to adequately safeguard personal data.

EU-U.S. Data Privacy Framework

The EU-U.S. Data Privacy Framework was designed by the U.S. Department of Commerce and the European Commission to ensure adequate protection for personal data transferred to a company participating in the EU-U.S. Data Privacy Framework. If we transfer any Personal Data about you from the EEA, UK or Switzerland to a third party in the USA that is participating in the EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework or Swiss-U.S. Data Privacy Framework (as applicable) we may rely on their participation in the Framework to ensure adequate protection for personal data so transferred.

Your Additional EEA, UK, and Swiss Privacy Choices

Subject to certain limitations at law, you may be able to exercise the following rights:

- **Right to Access:** The right to obtain confirmation of whether we are processing personal data about you, access to and a copy of the personal data we are processing about you, and information relating to its processing, including:
 - The categories of personal data being processed;
 - The purposes of the processing;
 - The categories of the sources of the personal data;
 - The categories of recipients to whom the personal data have been or will be disclosed;
 - The envisaged period for which the personal data will be stored, or the criteria used to determine that period;
 - Any automated decision-making or profiling performed in connection with your personal data; and
 - The safeguards relied upon for the transfer of personal data to any third country.
- **Right of Portability:** The right to obtain a copy of the personal data we have collected about you in a structured, commonly used, and machine-readable format, and the right to transmit that personal data to another controller without hindrance.
- **Right to Rectification:** The right to correct or update any personal data about you that is inaccurate or incomplete.
- **Right to Restriction of Processing:** The right to require us to limit the purposes for which we process your personal data if the continued processing of the personal data in this way is not justified, such as where the accuracy of the personal data is contested by you.

Right to Object to Processing: The right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal data, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.

- **Right to Withdraw Consent:** The right to withdraw your previously provided consent to our processing of your personal data. Please note withdrawing your consent will not affect the lawfulness of our use of your personal data before your consent was withdrawn, nor our processing of personal data pursuant to a different lawful basis for processing.
- **Right to Erasure:** The right to have us erase your personal data if the continued processing of that personal data is not otherwise justified.

Please note that if the exercise of these rights limits our ability to process personal data, we may not be able to provide our services to you, or otherwise engage with you in the same manner.

Submitting Privacy Rights Requests

Please submit a request specifying the right you wish to exercise by emailing us at privacy@nationalcompute.com.

Before processing your request to exercise certain rights (taking into account the confidential nature of any personal data we maintain), we will need to verify your identity and confirm you are accessing our services or otherwise interacting with us from the EEA, UK, or Switzerland. In order to verify your identity, we will generally either require the successful authentication of your account, or the matching of sufficient information you provide us to the information we maintain about you in our systems.

In certain circumstances, we may decline or limit your request, particularly where we are unable to verify your identity as needed to protect your personal data or locate your information in our systems, or where you are not accessing our services or otherwise interacting with us from the EEA, UK, or Switzerland.

Cookies

If you access our websites or services from the EEA, UK or Switzerland, other than cookies and similar technologies that are strictly necessary to operate all or part of the website or service, we will only place these technologies on your device and use them to collect and use data with your consent.

You can withdraw your consent to the use of these data collection technologies by clicking the “Cookie Settings” link in the footer of the website and adjust your preferences accordingly. Please note this preferences tool is website, device, and browser specific, so you will need to change your preferences on each device and browser you use to interact with the specific website you are visiting. In addition, you may follow the other steps set forth in the [Automatic Data Collection Preferences](#) section of the [Your Privacy Choices](#) section of our [Privacy Notice](#) to further exercise control over automatic data collection technologies.