

# Privacy Policy

## CryoCloud

### Classification: Public

This document contains information about our policies regarding the collection, use and disclosure of personal information and data that we obtain through our platform. By using our services, you agree to the collection and use of information in accordance with this policy.

## Purposes and Legal Grounds

The way we process and collect data through our platform is in conformity with the GDPR. The General Data Protection Regulation (EU) 2016/679 is an EU regulation on data protection and privacy for all individuals within the European Union with the aim to provide more transparency and control to European citizens over their personal information.

The following measurements have been implemented to comply with the GDPR.

- Data protection by design & default: Privacy and data protection principles are safeguarded by implementing technical and organizational measures from the design stage to the deployment of our platform.
- Transparency: We believe in the importance of being transparent with our data flow organization as well as to how access to data is structured.
- Data Protection Officer: We have appointed a Data Protection Officer who is a first point of contact in case of any concerns or questions related to our personal data policies or practices. Please contact us via [hi@cryocloud.io](mailto:hi@cryocloud.io).
- Privacy Statement: We hold a Privacy Statement with all users of our platform describing all GDPR rights.
- Duty to report Data Breaches: We hold a data breach procedure which included the GDPR rules of communicating data breaches.

## Type of Data Collected

The types of data collected through our platform are:

- Processing logs: all analysis jobs will be logged, containing e.g. runtime and the resources used, to ensure business operation, i.e. allow us to provide and troubleshoot errors, monitor & bill the resources you used for analysis, and optimize our application
- Web Data: We collect information that your browser sends whenever you visit our platform. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our website that you visit, and the time and date of your visit.
- Personal data: We collect personal data required to create the user account for the CryoCloud Dashboard. Personal data is defined as any information which are related to an identified or identifiable natural person.

## Storage, Retention and Deletion

Records of the personal data collected are processed by CryoCloud. Personal data is retained for as long as it is required to fulfill the agreements with our customers, for our business operations, or for a maximum of the statutory storage periods applicable to us.

## **Image Data ownership, IP, deletion & access**

You will maintain full ownership of all the image data that you upload and process, including resulting 3D density maps and .pdb protein models. You will retain all intellectual property rights associated with your data.

You will maintain access to data at any time and will have the option to request the download or deletion of datasets. If you have a request for deletion or download that cannot be accessed via the web-app, please contact us at: [hi@cryocloud.io](mailto:hi@cryocloud.io).

## **Cookies**

Cookies are files with a small amount of data, which may include an anonymous unique identifier. We use functional cookies that are essential for optimizing the users' navigation on the platform. These cookies also support the website security and basic functionality. The cookies are solely used for the functioning of our application and are not used for tracking.

## **Data to Third Parties**

We utilize third-party tools to ensure the proper functioning of our web app. As part of this, anonymous user data (Display name) is transferred. Please note that all third-party tools are GDPR compliant, shared data can be deleted upon request, and this data sharing is carried out solely for technical reasons to enhance the user experience and support the functionalities of our app. We do not transfer any data to third parties for commercial purposes.

## **View, Modify or Delete Personal Data**

You have the right to view, correct or delete your personal data. You can do this via the personal settings of your account. Next to that, you also have the right to withdraw your consent to the data processing or to object to the processing of your personal data by our company. You can request a record of your personal data that our company has stored by contacting us at the email address [hi@cryocloud.io](mailto:hi@cryocloud.io).

## **Filing a Complaint**

Users may file a complaint with our Data Protection officer via email [hi@cryocloud.io](mailto:hi@cryocloud.io). In case you may have a serious concern regarding data privacy, you may always contact "Autoriteit Persoonsgegevens" (<https://autoriteitpersoonsgegevens.nl>), or the Data Privacy Agency/Authority of your respective country.

## **Privacy Policy Version**

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a notice on our website. Your continued use of the service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

This Privacy Policy was last modified in **July 2024**.

CryoCloud B.V.