# Crystal aOS and Crystal Chat Privacy Policy

**1** This version: 16 April 2026 v1.4. Last updated: 4 November 2025 v1.3. Originally issued on 10 February 2025.

**2** Crystal agentic Operating System (**Crystal aOS**) (available at https://app.crystalaos.ai/), Crystal Chat (available at https://app.crystalchat.ai/) and our website (www.crystalaos.com) (**Website**) are built and operated by Agentic Assets Ops (Aus) Pty Ltd (ACN 672 615 851) (**Agentic**, **we**, **us**, **our**).

**3** This Privacy Policy sets out how we collect, use, store and disclose your personal information and any personal information you hold on behalf of your customers that you share with us (hereafter, referred to collectively as your personal information), in compliance with the Australian Privacy Act 1988 (Cth) (**Privacy Act**).

**4** Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include an individual's name, age, gender, postcode and contact details. It may also include financial information, including credit card information for an individual.

## Personal Information Collection Notice and Data Processing

**5** We limit the amount of personal information we collect, including by our use of third-party authentication providers so that you can create and sign in to your Crystal aOS Account with your existing third-party credentials. We also enable you to limit the amount of personal information you share with our third party providers, including by our implementation of PII Protection mode to remove certain types of personally identifiable information from prompts entered in the Crystal Chat application before the prompt is sent to third party large language model providers.

**6** By accessing and using the Services, you acknowledge and agree that Agentic will collect, use, store, and disclose personal information as described in our Privacy Policy and Data Processing Addendum. Where applicable law requires a specific legal basis for such processing, the applicable legal basis (whether consent, contractual necessity, legitimate interest, or otherwise) is identified in the Privacy Policy and Data Processing Addendum for each category of processing activity.

**7** For persons visiting our Website, as well as during our provision of Services to Authorized Users of Crystal aOS or Crystal Chat, the personal information we may collect includes an individual's:

**a)** name;

**b)** email address;

**c)** telephone number;

**d)** device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;

**e)** details of our Services provided to an individual or that an individual has enquired about, including any additional information necessary to deliver those Services and respond to an individual's enquiries;

**f)** any additional information relating to an individual that is provided to us directly through our Website, use of our Services, or indirectly through an individual's online presence or through other websites or accounts, including social media and communication accounts that an individual may use when engaging with our Official Channels;

**g)** information an individual provides to us through surveys;

**h)** an individual's work history and reference checks; or

**i)** any other personal information that may be required in order to facilitate an individual's or organisation's dealings with us.

**8** In some cases, we may not be able to allow you to access or use our Website, your Crystal aOS Account, Crystal aOS, Crystal Chat, the Services, Our Content or respond to your feedback or support request if you do not provide personal information.

**9** **Anonymity and pseudonymity**. You are welcome to use a pseudonym when initially interacting with us but you may be asked to verify your identity if the nature of your enquiry or the nature of our Services requires us to identify you.

## Why we collect, hold, use and disclose your personal information

**10** We may collect, hold, use and disclose your personal information for the following primary purposes:

**a)** to enable Authorized Users of Crystal aOS and Crystal Chat, as applicable, to access and use our Services;

**b)** to operate, protect, improve and optimise our Services, business and our users' experience, such as to perform analytics, evaluations for quality assurance and user support purposes, conduct research and for advertising and marketing;

**c)** to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;

**d)** to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;

**e)** to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us;

**f)** to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and

**g)** to consider your employment application or investment enquiry.

## How we collect your personal information

**11** We may collect personal information directly from you, or from third parties, when you:

**a)** interact with our Services, Official Channels, and advertising;

**b)** communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;

**c)** invest in our business or enquire as to a potential purchase in our business;

**d)** when you apply for a job or position with us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract; or

**e)** when we believe the personal information is not accurate, up-to-date, relevant and complete.

## Cookies

**12** We may use 'cookies' or other similar tracking technologies on our website that help us track your usage of our website and remember your preferences.

**13** Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our Services may not work as intended for you if you do so.

**14** We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

## How we hold your personal information

**15** We hold your personal information in electronic form. In particular:

**a)** the minimal personal information we receive from third-party providers like authentication providers and payment providers (e.g. Stripe) is stored in encrypted form in a database hosted by a server in Australia; and

**b)** with respect to your use of Crystal aOS, your data is collected and stored by us in databases hosted by servers in Australia or a region that our Client (e.g. your employer organization) selects on your behalf.

## Security of personal information

**16** We cannot guarantee the security of your personal information, especially when transmitted over email or in communication services without encryption. In our processes, selection of software, and third-party IT and security providers, we take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

## When and how we disclose your personal information

**17** Under this Privacy Policy we may disclose personal information to:

**a)** our employees and related bodies corporate;

**b)** third party suppliers and service providers (including providers for the operation of our website and/or our business or in connection with providing our Services to you);

**c)** professional advisers, dealers and agents;

**d)** payment systems operators (e.g. merchants receiving card payments);

**e)** anyone to whom our assets or businesses (or any part of them) are transferred;

**f)** specific third parties authorised by you to receive information held by us; and/or

**g)** other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

## Access to and correcting personal information

**18** Contact us to access or correct your personal information.

**19** Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

## Direct marketing

**20** We may send you direct marketing communications and information about our Services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act.

**21** At any time you may opt-out of receiving marketing materials from us by contacting us or by using the opt-out facilities provided (eg an unsubscribe link).

## Cross-border disclosure of personal information

**22** We may disclose personal information outside of Australia to third party technology suppliers providers located in other jurisdictions.

**23** We take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

## Dealing with unsolicited personal information

**24** Within a reasonable time after receiving unsolicited personal information we will determine whether the information must be destroyed or treated as collected, held and able to be disclosed in accordance with this Privacy Policy.

## What this Policy does not cover

**25** This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

**26** The privacy practices of, or any content on, any linked websites or third party providers that we have no control over. The privacy policies that apply to those other websites and third party products or services may differ substantially from our Privacy Policy, so we encourage you to read them before using those websites.

## Changes to this Policy

**27** We may change our Privacy Policy from time to time by publishing changes to it on our Website. We encourage you to check our Website periodically to ensure that you are aware of our current Privacy Policy.

## Making a complaint

**28** If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details below.

**29** Please include your name and email address and clearly describe your complaint.

**30** We will acknowledge your complaint and respond to you regarding your complaint within a reasonable time.

**31** If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

## Reasons to contact us; Contact details

**32** **Privacy and Data Protection Contact**. For enquiries regarding our privacy practices, data processing, or to exercise your rights under applicable data protection law, you may contact our Privacy Team at support@crystalaos.com. If applicable law requires Agentic to designate a data protection officer, the contact details of the data protection officer shall be published in this Privacy Policy.