



## Privacy Policy

### **Privacy Policy Summary:**

This is a summary of the AgriWebb group's privacy policy and may be used to help you navigate our privacy policy.

We are committed to respecting your privacy. Our privacy policy sets out how we collect, use, store and disclose your personal information. We recommend that you read our privacy policy in its entirety to understand how we handle your personal information.

In this summary and our privacy policy, **Services** means the access and use of our website, software and related services.

### ***Collection of personal information***

If you register to use our Services, we need to collect information about you and information about your property. We will also process some information when you use the Services, including making purchases and device information or integrate with third party logins. If you need to get in touch with us then we will also collect some information so that we can get back in touch with you. If you are a job applicant or contractor, we may collect identity information and information about your qualifications, experience and opinions from you and your references. **For more information: [see section 1 of our privacy policy below](#).**

### ***How we use your personal information***

We use your information lawfully for a range of purposes, including to enable you to use the Services and provide you support and updates. We also use personal information for direct marketing and in consultation with our business partners, as set out in this privacy policy. We may also use your personal information to assess your candidacy to work at AgriWebb and in the course of your employment or duration of your contract with us. **For more information: [see section 2 of our privacy policy below](#).**

### ***Where do we store and share your personal information with?***

Our servers and third party suppliers which store your personal information are located in countries including Australia, the United Kingdom and United States of America. We also have third party suppliers in Europe, Asia and the Americas.

We may share your personal information with third parties to help us provide the Services. When we provide information to a third party, it may only be processed on the terms of this privacy policy. We may also share your personal information with third parties in connection with a job application.

**For more information: [see section 3 of our privacy policy below](#).**

### ***Cookies and Similar Technologies***

We may collect personal information through the use of functional, marketing, advertising and performance cookies.

**For information see section 4 of our privacy policy below and see our separate [Cookie Policy](#).**

### ***Data Retention***

We retain your information while we provide the Services and afterwards in accordance with our retention policy (outlined below) and as required by applicable laws. If you are a job applicant, we will retain your information in accordance with workplace and privacy retention obligations. **For more information: [see section 7 of our privacy policy below](#).**

### ***Your Rights***

Depending on where you live, you may have certain rights with respect to your information, such as rights of access, to receive a copy of your data, or to delete your data or restrict or object to our processing of your data. **For more information: [see section 8 of our privacy policy below](#).**

### ***Contacts and Complaints***

If you have any questions or complaints about how we handle your personal information or to exercise rights in relation to your personal information, you can contact us on the details listed below.

If you are located in the European Union, please contact AgriWebb UK Limited's Data Protection Officer on:

Email: [dpo@agriwebb.com](mailto:dpo@agriwebb.com)

Phone: +44 28 4214 0006

Postal Address: The Innovation Centre, Queens Road, Belfast, Northern Ireland, BT3 9DT

If you are located in any other jurisdiction, please contact AgriWebb Pty Ltd's privacy officer on:

Email: [dpo@agriwebb.com](mailto:dpo@agriwebb.com)

Phone: +61 2 8417 3054

Postal Address: 2/85 Commonwealth Street, Surry Hills NSW 2010

### ***How will we notify you of changes?***

If there are any significant changes to this privacy policy, we will update the policy at <https://www.agriwebb.com/privacy-policy/>.

## AgriWebb Privacy Policy

In the Privacy Policy, **AgriWebb, us, we** or **our** means AgriWebb Pty Ltd (ACN 163 515 900), AgriWebb UK Limited (company number NI049264) and other members of the AgriWebb group. This privacy policy sets out how, when and why we collect, store, use, disclose and otherwise process personal information in connection with our Services and your rights in relation to your personal information.

Please read this policy clearly – it is important you understand how we collect and process your information and how we control it.

**If you do not agree to the processing of your personal information in the way this privacy policy describes, please do not provide your information when requested and stop using the Services. By using the Services you are accepting our processing of your personal information as described in this privacy policy.**

### 1 Collection of Personal Information

#### 1.1 *Information we collect directly from you*

AgriWebb collects personal information when you enquire about or register for our Services. This includes information such as:

- your name, mailing or street address, email address, and telephone number;
- your property identification number (PIC, CPH, etc depending on jurisdiction), property name and address, farm and business name, property size, farm map information and farm operation type;
- credit card information and account details; and
- information through customer surveys, promotions, competitions and any enquiries.

If you are a job applicant or wish to provide services to AgriWebb, we may collect information such as:

- your name, residential address, postal address, telephone number, email address and banking or payment information;
- your gender and date of birth;
- details about your qualifications, skills, employment history and salary;
- links to your professional profile (e.g. LinkedIn or corporate website);
- your company name, ABN and applicable tax information;
- your citizenship status and/or right to work; and
- whether you have a disability or illness we need to accommodate.

#### 1.2 *Information we collect automatically*

We automatically collect certain data from you when you use the Services. This includes your device ID, device type, geo-location information, computer and connection information, network provider, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information.

We may also collect any additional information relating to you that you provide to us directly through our Services or indirectly through your use of our Services or online presence or through other websites or accounts from which you permit us to collect information.

### 1.3 Information we collect from other sources

We may collect personal information from third parties in some circumstances, such as:

- when you opt in to third party integration with Government body logins (e.g. NLIS, BCMS), Figured, Cibo Labs and Farmbot;
- when you attend a conference at which we are a partner; and
- from your references in connection with a job application or from publicly available sources e.g. your LinkedIn profile.

## 2 How we use your Personal Information

This section sets out more detail of the reasons we collect and use your personal information, and the lawful grounds for use:

<i>Information you provide to us (either directly or through a third party)</i>	
AgriWebb Account details: <ul style="list-style-type: none"> <li>• Username/password</li> <li>• Business name</li> <li>• Business address</li> </ul>	We use the login information to validate access to the AgriWebb application. The address is used to expose features relevant to your region. The business name is used for accounting.
3rd party integration with: <ul style="list-style-type: none"> <li>• Government bodies logins (NLIS, BCMS etc)</li> <li>• Figured</li> <li>• Cibo Labs</li> <li>• FarmBot</li> </ul>	We use these logins to integrate your AgriWebb account with these 3rd party systems.  Integrations are opt-in and are not set up by default.
Applicant or service provider: your contact information, gender, details about your qualifications and work history, and your right to work,	Assess your suitability as a candidate as an employee or service provider to AgriWebb.
<i>Information generated as part of the application (and its in-application services)</i>	
Application data (including log information for analytics): IP address, device model details of platform	We use this information to understand usage and issues that may arise through multiple device syndication or other support problems. This includes creating derivative data sets for the purposes of analysing and improving the Services.
Farm data <ul style="list-style-type: none"> <li>- Mob animal history</li> <li>- Individual animal history</li> <li>- Inventory</li> <li>- Tasks</li> </ul>	We store this information which is the fundamental information used for AgriWebb's farm management capabilities.

<ul style="list-style-type: none"> <li>- Rainfall and weather data</li> <li>- Paddock information</li> <li>- Operational plans</li> <li>- Farm and Business names and registrations</li> </ul>	<p>We may also create derivative works using aggregated de-identified data sets for the purposes of analysing and improving the Services.</p>
<p>Transaction Records: payments on ChargeBee, Stripe, GoCardless (subscription purchased, payment method).</p>	<p>We use this information to facilitate your payment and to maintain a record of your purchase history and active subscription status.</p> <p>We do not store credit card details in AgriWebb's application - that is stored on Stripe. We also do not store direct debit details in AgriWebb's application - that is stored on GoCardless.</p>
<p>Customer Support (in-App and via website with intercom): Name (optional for website support), device ID, application version, free space on device, OS version, browser type, platform, carrier, country code, chat log, email address (optional if website support) and any information that you provide in communications with our support team.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● analyse and improve our Services;</li> <li>● provide guidance on how to use our application; and</li> <li>● provide troubleshooting, such as addressing and remediating technical issues and bugs.</li> </ul>
<p>Application Support (app crash logging): device ID, OS version, browser type, platform, email, app version, error details, app usage log (for last 10 actions prior to the error)</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● improve our Services; and</li> <li>● identify, track and address technical issues and bugs.</li> </ul>
<p>Customer Feedback</p> <ul style="list-style-type: none"> <li>- Net Promoter Score (NPS) ratings</li> <li>- Free text response feedback</li> </ul>	<p>We use this information to understand pain points that our customers are facing so we can constantly improve AgriWebb by listening to our users.</p>

### 3 How we store and share your personal information:

AgriWebb may store and disclose personal information to locations outside the country in which you live. If you are located in the UK or EU, your information may be transferred outside of the European Economic Area (EEA) to countries that do not have laws equivalent to EEA data protection laws, including Australia. We may also engage service providers outside the EEA. When we transfer your personal information outside your country of residence, we take steps to ensure that your information is secure.

Our servers for the Services and third party service providers are located in the following jurisdictions:

- Australia;

- Europe: United Kingdom, Ireland, Netherlands, Denmark, Finland, Belgium, Germany, France;
- Americas: United States of America, Canada, Chile
- Asia: Taiwan, Singapore, Japan.

We may disclose your personal information only where necessary and as follows:

- *Affiliates*: we may share information with our employees and the AgriWebb Group;
- *Service Providers*: we share your information with our third party service providers who assist us in providing our Services or in our business operations, including providers of payment processing, professional advisors, website services or analytics providers;
- *Our Partners*: we may share your information with our sponsors or promoters, including in connection with any competition we conduct via our Services;
- *Sale or Transfer of Business*: we may share your information with any party to whom our assets or business (or any part of them) are transferred;
- *Recruitment or third party agencies*: we may disclose your personal information to recruiters who provide your information to us, to third party references you've provided us, and to enable verification and background checks for job applicants and service providers;
- *Legal Matters*: we may disclose personal information to government agencies, regulatory bodies and law enforcement agencies, as required, authorised or permitted by law; and
- *With your Consent*: we may share your personal information with third parties authorised by you to receive information held by us.

While we take reasonable steps to ensure that third party recipients of your personal information comply with privacy laws that are similar to those in your jurisdiction, you acknowledge and agree that we cannot control the actions of third party recipients and so cannot guarantee that they will comply with those privacy laws.

#### **4 Cookies**

We may use 'cookies' on our website that help us track your website usage and remember your preferences. 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 applicable privacy laws. 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.

For more information on the functional, marketing, advertising and performance cookies we use, please review our [Cookie Policy](#).

#### **5 Security**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as

unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of the information transmitted to our services; therefore we do not assume any responsibility for any transmission of your information which you do at your own risk.

## 6 Links

Our Services may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## 7 Data Retention

The categories of personal information described in the table at section 2 above are retained for the following periods, unless otherwise required by law or with our consent.

Personal Information	Retention Policy
Customer account data	Until you request erasure of such data. Customer data is deleted within 30 days of a lawful request from you for the erasure of such data.
Farm data	Until you request erasure of such data. Farm data is deleted within 30 days of a lawful request from you for the erasure of such data.
Survey information	Until you request erasure of such data. Survey data is deleted within 30 days of a lawful request from you for the erasure of such data.
Customer support information	Until you request erasure of such data. Support data is deleted within 30 days of a lawful request from you for the erasure of such data.
Security-related information.	Our access tokens used for login are valid for 2 weeks. These are auto-refreshed upon valid usage on application launch.
Transaction records	Until you request erasure of such data. Transaction data is deleted within 30 days of a lawful request from you for the erasure of such data.
Employee or service provider data	In accordance with workplace and privacy retention obligations.

## **8 Your Rights**

Some countries grant specific rights, which are set out in this section. If you are located in the UK or European Union, all of the below rights apply to you. If you are located in Australia, only “access” and “correction” rights apply. If you would like to exercise any of these rights, please contact us using the contact details below.

### **8.1 Access**

You have the right to access personal information we hold about you, how we use it, and who we share it with. You can access the personal information you have made available as part of your account by logging into your Services account.

### **8.2 Correction**

You have the right to correct any of your personal information we hold that is inaccurate. You can access the personal information we hold about you by logging into your Services account.

### **8.3 Erasure**

Where we process your personal information, you can withdraw your consent at any time, exercise your rights to object to processing based on legitimate interest, and ask us the source of personal information held and whether it came from publicly accessible sources. You can also object to us using your information for direct marketing purposes.

Note that exercising your right to be forgotten by requesting a removal of personal data may result in AgriWebb being unable to provide some or all of our Services to you.

### **8.4 Restriction of processing**

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection law for us to do so (e.g. for the defence of legal claims or for another’s protection).

Where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing it too.

You may request we stop processing and just store the Personal Information we hold about you where:

- you believe the personal information is not accurate (for the period it takes for us to verify whether it is accurate);
- we wish to erase the personal information as the processing we undertake is unlawful (but you want us to retain the personal information and just store it instead); or
- we wish to erase the personal information as it is no longer necessary for our purposes (but you require it to be stored for the establishment, exercise or defence of legal claims).

### **8.5 Portability**

If you wish for us to transfer your personal information to a third party, please ensure you detail that party. Note that we can only do so where it is technically feasible. We are not responsible for the security of the personal information or its processing once received by the third party.



## **8.6 Objection**

You may object to our use of your personal information if we use your information on the basis of our legitimate interests (such as when we use your personal information for your account security, such as to prevent malicious log-ins). To the extent provided by applicable laws and regulations, you may also withdraw any consent to processing you previously provided to us.

## **9 Contacts and Complaints**

We welcome questions, comments and requests regarding this privacy policy.

In the event that you wish to make a complaint about how we process your personal information, then please contact as soon as possible. This is without prejudice to your right to launch a claim with the data protection authority in the country in which you live or work where you consider we have infringed data protection laws.

### **9.1 Contact details for EU customers**

If you are located in the European Union, please contact the AgriWebb UK Limited Data Protection Officer on:

Email: [dpo@agriwebb.com](mailto:dpo@agriwebb.com)

Phone: +44 28 4214 0006

Postal Address: The Innovation Centre, Queens Road, Belfast, Northern Ireland, BT3 9DT

### **9.2 Contact details for other customers**

If you are located in any other jurisdiction, please contact AgriWebb Pty Ltd Data Protection Officer on:

Email: [dpo@agriwebb.com](mailto:dpo@agriwebb.com)

Phone: +61 2 8417 3054

Postal Address: 2/85 Commonwealth Street, Surry Hills NSW 2010

## **10 Changes**

If we make any material changes to this privacy policy, we will post the updated privacy policy on our website <https://www.agriwebb.com/privacy-policy/>. Please check frequently to see if there are any updates or changes to this privacy policy.

## **Supplementary Terms: Australia**

If you are located in Australia, the following terms apply to you:

### **1 Your rights**

If you are dissatisfied with our response to your request for access to, or correction of, your personal information or your privacy complaint, you may contact the Office of the Australian Information Commissioner by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or telephone: +61 1300 363 992.

### **2 Transacting Anonymously**

Where practicable, we will give you the option of not identifying yourself or using a pseudonym when interacting with us. You acknowledge that if you don't provide us personal information, we may be unable to provide you with access to certain sections of the Services or effectively respond to your query.