

# Pure Farming Privacy Notice

Version date 22<sup>nd</sup> May 2022

We are committed to protecting and respecting your privacy.

This notice sets out the basis on which any personal information and personal data (**personal data**) we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand how we will use your personal data and your rights in relation to your personal data.

## 1 Important information and who we are

Pure Farming is an online data platform (**Platform**) and information service (the **Services**) operated by Map of Agriculture Group (**Map of Ag**).

1.1 Map of Ag comprises several different legal entities, including:

1.1.1 *Map of Agriculture Limited, Map of Ag Analytics Limited, National Farm Research Unit Limited, Precision Decisions Limited, Barbican Animal Health Limited, and Evidence Group Limited*, all with their registered offices at 15 Deben Mill Business Centre, Old Maltings Approach, Melton, Woodbridge, Suffolk IP12 1BL, UK, Tel: +44 1394 389 250.

1.1.2 *Map of Agriculture NZ Limited*, with its registered office at Top Floor, CRV Building, 2 Melody Lane, Hamilton 3216, New Zealand, Tel: +64 7 8570820.

1.1.3 *Rezare Systems Pty Limited*, with its registered office at Melbourne 3000, Victoria, Australia, Tel: +61 2 6188 4429.

1.2 This privacy notice is issued on behalf of the Map of Ag group companies listed above so when we mention “**Map of Ag**”, “**we**”, “**us**” or “**our**” in this privacy notice, we are referring to the relevant company in the Map of Ag group responsible for processing your data.

### Controller

1.3 Map of Ag is the controller and responsible for your personal data. Our Information Security and Risk Manager is responsible for overseeing privacy matters. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager by emailing [privacy@mapof.ag](mailto:privacy@mapof.ag).

### Changes to our privacy notice

1.4 Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

## 2 The data we collect about you

- 2.1 **Personal data** means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (i.e. anonymised).
- 2.2 The type of personal data we collect about you depends on who you are and your relationship with Map of Ag. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
  - 2.2.1 **Identity Data** includes first name, last name, username or similar identifier, employer or business organisation, and position/title.
  - 2.2.2 **Contact Data** includes postal and/or residential address, email address and telephone numbers.
  - 2.2.3 **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, cookies, operating system and platform and other technology on the devices you use to access our website, and which may be linked to your personal data.
  - 2.2.4 **Usage Data** includes information about how you use our Platform, website, products and Services.
  - 2.2.5 **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us or we have bought from you.
  - 2.2.6 **Marketing and Communications Data** includes your preferences in receiving marketing (for example our e-newsletters) from us and your communication preferences.
- 2.3 We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose.
- 2.4 Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate statistics to understand usage of our website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.
- 2.5 Our Services are not intended for individuals under the age of 18. We do not intentionally collect personal data from children. If you are the parent or guardian and believe your child has provided us with personal data, please contact us at [privacy@mapof.ag](mailto:privacy@mapof.ag) to request deletion.
- 2.6 Please do not provide us with information about another person, unless that person has authorised you to do so. If you provide information to us about another person then you are responsible for making that individual aware that you have disclosed their personal data to us and that we can use their information as set out in this policy.

## Special categories of personal data

- 2.7 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3 How is your personal data collected?

- 3.1 We use different methods to collect data from and about you including through:

- 3.1.1 **Direct interactions:** you may give us your Identity Data, Contact Data, and Marketing and Communications Data by interacting with us through the Pure Farming Platform and Services. This may include use of the Platform and Services when they are integrated with other software or systems operated by other businesses.
- 3.1.2 **Automated technologies or interactions:** As you interact with the Platform and Services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by several means including using cookies, web beacons, server logs, pixels and other similar technologies.
- 3.1.3 **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources including those set out below:
- (a) Technical Data from analytics providers such as Google based outside the EEA or UK.
  - (b) Identity Data from a federated identity provider (such as Facebook, Twitter, or Microsoft) if you choose to use a federated identity provider to log on to the Services. We do not use other information that your federated identity provider may hold (such as friends, posts, tweets, or other social media details).
  - (c) All other readily available sources of public information.

## 4 How we use your personal data

- 4.1 We will only use your personal data in accordance with applicable laws. Most commonly, we will use your personal data in the following circumstances:
- 4.1.1 Where you have given your consent to the processing of your personal data for a particular purpose.
  - 4.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - 4.1.3 Where it is necessary for the performance of a contract with you.
  - 4.1.4 Where we need to comply with a legal or regulatory obligation.

## Purposes for which we use your data

4.2 We have set out below a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate:

Purpose / Activity	Lawful basis for processing, including basis of legitimate interest
To support farmers and growers connecting agricultural data (excluding personal data) with our customers by using the Services, including providing you with secure access to the Platform and allowing you to provide, request or control access to agricultural data.	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To share your personal data with Data Consumers if you have given permission for such sharing	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
To combine your personal data with the personal data of others to present anonymised and aggregated data to Data Consumers with whom you have a relationship	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Necessary for our legitimate interests (our business model includes providing aggregated insights and trends which are useful and valuable to our customers)</li> </ul>
To provide you with products and services you have purchased from us or are in negotiations to purchase from us including setting up your account and access to our Platform, communications, managing the provision of the Services including support services and to manage and collect fees where relevant.	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover amounts due to us)</li> </ul>
To manage our relationship with you which will include: <ol style="list-style-type: none"> <li>1. Notifying you about changes to our terms or policies</li> <li>2. Asking you to update your information</li> </ol>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records and database updated)</li> </ul>
To send you information about new features or functionality of our Platform and Services	<ul style="list-style-type: none"> <li>• Consent (soft opt-in)</li> </ul>
To send you our newsletters	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
To administer and protect our business and the Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To use data analytics to improve our websites, the Platform, the Services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To comply with the laws and regulations applicable to Map of Ag or any of their related entities internationally	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> </ul>
For any other purpose specifically authorised by you	<ul style="list-style-type: none"> <li>• Consent</li> </ul>

## Marketing

- 4.3 As a user of our services, you may receive information from us about new features or functionality of our Platform and Services. This information may amount to marketing under the law and we will send this to you under soft opt-in consent unless you have unsubscribed from our marketing communications. We take soft opt-in consent as given because you have signed up for our services already.
- 4.4 You may receive our e-newsletter if you have told us that you would like to receive it.

## Opting out

- 4.5 You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time at [privacy@mapof.ag](mailto:privacy@mapof.ag).

## Cookies

- 4.6 Our Platform uses cookies to distinguish you from other users of our Platform. This helps us to provide you with a good experience when you use our Platform and allows us to understand how you are using our Platform so that we may improve it. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Notice](#).

## 5 Disclosures of your personal data

- 5.1 We will only disclose personal data in accordance with this Notice and relevant Privacy Laws.
- 5.2 We may share your personal data for the purposes set out in the table in section 4.2 above with the parties set out below:
  - 5.2.1 Other members of the Map of Ag group of companies, in order to facilitate the purpose for which the information was collected and as administrative support and services are shared between the Map of Ag group.
  - 5.2.2 Our customers and other third party agri-businesses where you have given specific consent for us to share your details with such businesses.
  - 5.2.3 Service providers acting as processors upon whom we rely to deliver, operate, maintain or support the Platform or through whom we send out our e-newsletters and other communications. A list of our current sub-processors is available by emailing [privacy@mapof.ag](mailto:privacy@mapof.ag)
  - 5.2.4 Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - 5.2.5 HM Revenue & Customs and the tax authorities, regulators, and other authorities, legal or otherwise, in the countries in which we operate or in which you reside, if required by

such authorities. Where practicable, we will notify you if we are required by law to disclose your personal data.

- 5.2.6 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
- 5.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only allow them to process your personal data for specified purposes and in accordance with our instructions.

## 6 International transfers

- 6.1 We share Platform log-in information, Identity Data and Contact Data for HelpDesk purposes, details of our customers and their representatives and prospect marketing information between our group companies in the UK, New Zealand and Australia. Our UK businesses provide administrative services for the whole Map of Ag group and so your data may be transferred to the UK and to service providers engaged to support our operations.
- 6.2 When we use our service providers, your data may be transferred, stored and/or processed in areas outside of your region as our suppliers may operate from outside of your region. We will only transfer your data outside of the country of origin in compliance with relevant data protection laws and provided appropriate or suitable safeguards are in place to protect your data, including applicable laws, Standard Contractual Clauses and/or Binding Corporate Rules. Please contact us if you would like details of the appropriate safeguards.

## 7 Data security

- 7.1 We have put in place appropriate administrative, physical, and technical security safeguards to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we use all reasonable endeavours to limit access to your personal data to those employees, agents, contractors and other third parties who require such information. We will take all reasonable steps to ensure that any third parties only process your personal data on our instructions, and are subject to a duty of confidentiality.
- 7.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8 Data retention – how long will we use your personal data

- 8.1 We will retain your personal data for as long as necessary for the purposes for which the information was collected. This includes any third-party services you use or access that depend on the Services. We will also retain your personal data as necessary to fulfil our contractual obligations and to comply with our legal obligations, resolve disputes, and enforce our agreements.

- 8.2 We will retain personal data to enable us to send you our newsletters until you unsubscribe or for a period for which we think that information is relevant. We actively manage our marketing database so that only relevant personal data is retained.
- 8.3 Where we no longer need to process your personal data for the purposes set out in section 4.2 of this Privacy Notice, we will delete your personal data from our systems unless we need to retain a limited amount of information to make sure that we act in accordance with your wishes or as required for compliance or legal purposes.
- 8.4 Where permissible, we will also delete your personal data on your request. Information on how to make a deletion request can be found in section 9 of this Privacy Notice.

If you have questions about our data retention practices, please contact us through [privacy@mapof.ag](mailto:privacy@mapof.ag).

## 9 Your legal rights

### 9.1 You have the right:

- 9.1.1 To access any personal data that we hold about you and we will provide a copy of your personal data together with details of the purposes of the processing, the types of personal data we hold and the people to whom your personal data has been disclosed;
- 9.1.2 To have inaccurate or incomplete personal data corrected or to restrict the processing of personal data whilst the accuracy is checked;
- 9.1.3 In certain circumstances, to have data we hold about you transferred to yourself or another data controller. Note, this right only applies to information that is processed by automated means which you initially provided consent for us to use or where we used the information to perform a contract with you;
- 9.1.4 To ask to have personal data we hold about you erased. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law;
- 9.1.5 To ask us not to process your personal data for direct marketing purposes;
- 9.1.6 To object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms;
- 9.1.7 To withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent; and

9.1.8 To lodge a complaint with a data protection supervisory authority applicable to you, if you have a concern about your personal data:

- (a) In the UK: The UK Information Commissioner's Office  
<https://ico.org.uk/make-a-complaint/>
- (b) If you are a resident of an EEA country, with the [Irish Data Protection commissioner](https://www.dataprotection.ie/): <https://www.dataprotection.ie/>
- (c) In New Zealand: The New Zealand Privacy Commissioner  
<https://www.privacy.org.nz/your-rights/making-a-complaint/>
- (d) In Australia: The Office of the Australian Information Commissioner  
<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>

You can exercise your rights at any time by contacting us at [privacy@mapof.ag](mailto:privacy@mapof.ag).

#### What we may need from you

- 9.2 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

- 9.3 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.