

## **We are committed to your privacy**

At Agro.Club Canada Inc. (“Agro.Club”, “we,” “our” or “us”), we understand that your privacy is very important to you. It is important to us, too. It would be impossible for us to help farmers, retailers, distributors, dealers, wholesalers, manufacturers or suppliers do business on a digital platform without collecting information. This means trust is at the core of our operations.

This Privacy Policy sets out what information Agro.Club may collect, store, process, use and disclose. Privacy can be complicated, especially when you involve digital technology. So, we want to be clear on a few things right from the start.

- We believe that having access to personal information is a privilege and a responsibility. We take it seriously. That’s why we’ve provided all the detail we can right here. If you have any questions, we want you to call us.
- Your information is your business. **YOU** control how your information gets shared. Some of it will need to be shared with us and the parties you make purchases from so we can do business with you.
- **We are not going to disclose or sell your personal information to any other party unless you’ve agreed.**
- **We go to great lengths to safeguard your information.** And so too must the parties that we are sharing it with, when you consent.
- **You play an important role in safeguarding your information. This can be done in simple ways by securing your password and making sure you read consent language carefully.**
- **We only collect information when you’re using the App or Website or submitting information to us.**
- **We don’t use the App or Website to collect information about your physical location, other than when you give us your address or farm location.**

In order to make sure we’re all on the same page, we’ve laid out a few clear definitions to make it easier to know what all this means.

- When we say **Website**, we mean Agro.Club’s website located at [agro.club](http://agro.club).
- When we say **App**, we mean Agro.Club’s downloadable applications that can be used on a mobile phone or through the desktop of your computer or tablet.
- When we say **Offerings**, we mean any of the existing and future products and services offered by Agro.Club or its partners and affiliates and any content including, without limitation, SMS-based systems for booking products, accepting terms, entering binding contract offers and acceptances, bookings, market data, price information, connectivity, contract confirmation, and messaging.

- When we say **Systems**, we mean any of the existing and future electronic systems on our website, desktop or mobile applications, application programming interface (API), short message service (SMS) platforms and other platforms through which Agro.Club and its affiliates make the Offerings available to you.

Together, the Website, the App, the Offerings and the Systems are called the “**Agro.Club Platform**”. Using any part of the Agro.Club Platform means that you accept the term of this Privacy Policy and that you consent to Agro.Club collecting, using, disclosing and storing your Personal Information.

***\*\*\*If you do not agree to the terms of this privacy policy, you are not permitted to access or use the Agro.Club Platform\*\*\****

### **Your information**

When we refer to Personal Information, we rely upon the definition under applicable privacy laws. Generally speaking, though, personal information means information about an identifiable individual. An identifiable individual is one who can be identified by reference to a unique identifier such as a name.

The kinds of Personal Information we collect and process, by or on behalf of us, may include:

- **Contact information** like your name, home, farm or business address, email address(es), telephone number(s), date of birth, employer, profession and job title.
- **Technical information** like your interactions with and usage of the Agro.Club Platform, email communications you have with us, your IP address, unique device identifiers, pages viewed, date and time of access, username, password, device type, browser type and settings, language settings, aggregate statistical information, cookie data, browsing history, advertising interests, responses to direct marketing and opt-outs from direct marketing.
- **Grower information** like grower offers, transport offers, crop data, agronomic data, land data, satellite imagery, and grower management data.
- **Financial information** like payment information, historical and current purchase and transaction data including farmgate price, product and volume, bank details, card details, and purchase interests.

### **Why we collect information**

The information we request from you is generally required to provide you the products and services we and our partners and affiliates offer, to help fulfill orders, provide information about grower programs and assess eligibility and pricing. Basically, we want to provide you with the best possible and most functional version of the Agro.Club Platform. Without this information, certain functions may not work for you and certain information may not be available.

Agro.Club and our partners and affiliates may contact you by email, text, direct message, through the App or via other electronic communication to provide you with marketing materials about products or services that may be of interest to you based on the purchases you have made

or are making with them on the Agro.Club Platform. If you do not wish to receive such communications, just follow the unsubscribe options.

### **How we collect information**

Generally, we collect Personal Information from:

- **Direct Interactions** like when you sign up for an Agro.Club account, contact us, inquire about products or services, input information and use the Agro.Club Platform.
- **Mobile Applications** like when you download or use one of our Apps on your phone or tablet or laptop. We can only access the information you input into the App and about how you use the Agro.Club Platform.
- **Technologies** such as cookies, application programming interface (API), short message service (SMS).
- **Social Media** such as what you make available by linking to social media platforms using social media plug-ins, or sharing your social media posts and profile(s).
- **Information about your farm management practices or operations** to the extent that **you share this information and post content on the Agro.Club Platform** about your business, your land, your crops, your family or anything use you choose to voluntarily share with us, the companies we partner with and other users of the Agro.Club Platform.
- **Grower Technologies** such as when you use, or receive any service offerings that include, any agronomic, data recording, mapping or satellite technologies.
- **Dealers, Retailers & Agriculture Input Companies** such as when you provide Personal Information to: a) an authorized Agro.Club partner, affiliate, retailer, distributor or reseller, including historical purchase and transaction data including farmgate price, product and volume; b) entities that use the Agro.Club Platform to help do business with you; c) those to whom you have previously provided consent for them to share your Personal Information . If you do business with a company today, you have probably already given them consent to contact you or share your information with companies you or they are doing business with.

### **How we use information**

We may use Personal Information to:

- help provide the products or services that we offer and/or that you've requested;
- facilitate and enhance your use of the Agro.Club Platform by sharing historical purchase and transaction data including farmgate price, product and volume with the Dealers, Retailers and/or Agricultural Input Companies *you select* through the Agro.Club Platform;
- evaluate your eligibility for farmer rebates and other grower programs and administer those programs and rebates;
- contact you about the products and services that Agro.Club and our partners and affiliates

including Dealers/Retailers and Agricultural Input Companies offer;

- process, evaluate and respond to your requests and questions;
- communicate with you about your work and use of the Agro.Club Platform;
- offer additional services to you, subject to your consent;
- process payments for services and for related financial requirements as may be applicable;
- enable the creation of bids and offers on the Agro.Club Platform;
- enforce the Agreement and this Privacy Policy;
- analyze and track usage of our App and Website, improve functionality and user experience, and identify technical and service problems;
- comply with legal requirements, industry standards and our own policies;
- verify your identity;
- send you statements and invoices and/or respond to questions you submit;
- update you on changes to our terms, conditions, policies and other administrative information;
- send you communications about our products and services, programs, events, campaigns, functions or news updates that may be relevant or of interest to you, subject to your ability to unsubscribe at any time;

You agree that we may use your Personal Information for any of these purposes.

### **How we will NOT use information**

The Personal Information you provide to us is being used in accordance with your consent in this Privacy Policy. Basically, unless you have consented, we won't do it.

### **The circumstances in which we may disclose information**

We *may* disclose Personal Information in the following circumstances:

- **Service providers** who provide services to us. For example, we may use service providers for hosting or operating the Agro.Club Platform or for analyzing data.

We ensure service providers have committed to appropriately safeguard your privacy too and are given only the information they need to perform their designated functions. We do not authorize them to use or disclose personal information for their own marketing purposes.

We may work with service providers who are located within and/or outside of Canada and who may store their data outside of Canada. Such service providers may be subject to laws that are different from Canadian laws and Canadian privacy requirements. We will use contractual or other means to protect Personal Information by ensuring that any service provider that Agro.Club shares or discloses information with will legally be required to provide the same or equal protection of data as provided by Agro.Club.

- **If legally required** by a court of law or as otherwise required or permitted by law, or to establish, exercise or defend our legal rights, Agro.Club and our service providers may disclose your Personal Information.
- **If we sell the business or merge with another entity**, we may transfer Personal Information in connection with the merger or sale or other change in corporate control. We may sell, transfer, or otherwise disclose our database of Personal Information to an actual or potential successor entity, purchaser, or investor in connection with a corporate merger, consolidation, sale of our assets or a substantial part of our assets, share sale, investment transaction or other corporate rearrangement.

You agree that we may disclose your Personal Information in any of these circumstances. We disclaim all liability for any privacy breaches by third parties to whom we have disclosed your Personal Information in accordance with this Privacy Policy.

**We use cookies & analytics. Here's what they are and what they do.**

We want to make your online experience as smooth, informative and relevant as possible. To do this, we use digital tools such as cookies, web beacons, pixel tags, clear GIFs, and other technologies.

Cookies, for example, are small bits of text placed on your computer's hard drive or mobile device upon visiting certain websites or App. Cookies hold information that allow a website or app to personalize a visitor's experience and trigger certain functions. Cookies can also be used for security reasons and/or to gather usage data, including browser type, webpage visits, downloads, time on a website or app, language preferences, and how visitors move from webpage to webpage. We, or our service providers, may use cookies to:

- improve the functionality of our Website and App and personalize your experience;
- process your purchase and booking orders;
- display information more effectively;
- gather information about how our Website and App are used and compile anonymous and aggregate statistics.

You can refuse the use of cookies by selecting the applicable settings on your web browser or mobile device to disable or delete them. By deleting cookies, disabling cookies, or not accepting cookies, it may impact your website and app experience, including how it looks and how it functions during your visit. Please note that many opt outs use browser cookies or device controls and are specific to the device, or browser, you are using. If you buy a new computer, change web browsers or devices, or delete the cookies on your computer, you may need to opt out again.

Pixel tags, web beacons, clear GIFs, or other similar technologies may be used in connection with our Website and App to track the way you use them and to compile statistics about site usage and response rates. This information is generally automatically provided to us by your web browser.

We also use third-party applications, such as Google Analytics, on our websites to collect data to provide a better online experience and to better understand those who are interested in our services. Google Analytics can analyze a website user's behaviour and provide us with valuable insight to improve our websites and services. Google may use this information to monitor usage of our websites. Google may transmit this information and/or store it in the United States. Google may transfer this information to other parties where required or permitted by law.

For more information about Google's privacy policy regarding Google Analytics, please refer to <https://policies.google.com/privacy>.

To learn about opting-out of Google Analytics, please refer to [https://support.google.com/analytics/topic/2919631?hl=en&ref\\_topic=1008008](https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008)

We use generalized, aggregated analytics data in connection with our services and may use or disclose such aggregated data without consent.

### **Links to other websites and apps**

The Agro.Club Platform may contain links to third party websites and social media features. Such sites operate independent of us. We are not responsible for their content, their functionality, or their privacy policies. Links to other websites or apps do not constitute sponsorship, endorsement or approval of them or their content.

### **How we will keep your information safe**

Agro.Club retains your Personal Information only for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation. For the purpose of business continuity, Agro.Club backs up your data within the Agro.Club infrastructure. As soon as these retention periods are complete, the data will be deleted or properly anonymized so that you can no longer be identified from it.

We have put in place physical, organizational and technological safeguards to help protect it from loss, theft, unauthorized access, disclosure, copying, use or modification. All our employees and contractors are subject to confidentiality obligations and training that help to protect Personal Information. Our employees and contractors are granted access to Personal Information only on a need-to-know basis to carry out their duties.

We also have a designated privacy officer who is tasked with ensuring compliance with applicable privacy laws and our privacy policies.

Agro.Club processes all data in a manner that ensures appropriate security of the Personal Information, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures. Additionally:

- Agro.Club has imposed disciplinary and punitive measures for violations of the comprehensive information security program rules;

- Agro.Club performs regular monitoring to determine if the information security program is operating in a manner to prevent unauthorized access to or unauthorized use of Personal Information.

### **Breach notification**

In the unlikely event of a security breach that creates a real risk of significant harm to you, we will notify the Privacy Commissioner of Canada or such other commissioner as appropriate under applicable privacy laws and all affected individuals in writing as soon as feasible. We will make sure that we clearly outline any relevant details so that steps can be taken to minimize any such risk or harm. We will contact you, if possible, using the most current contact information we have for you in our records.

### **Your role in safeguarding information**

We take all reasonable steps to make sure the Agro.Club Platform is secure but there are inherent risks associated with the the internet. Complete security just can't be guaranteed by anyone. We therefore cannot warrant the security of any information you provide to us over the internet and you do so at your own risk.

In addition, some things are out of our control. For example, if you create a really simple password or share your password with people, others may use it to do things using the Agro.Club Platform you don't like. It is your responsibility to maintain confidentiality of your account. It's an important role you can play in keeping your Personal Information secure. We will not be liable for any damage, loss or expense suffered due to such disclosure.

### **Privacy of children**

We do not collect information from, or direct any Agro.Club Offerings, to children under age 18. If Agro.Club learns that information has been received from a child under 18, then Agro.Club will delete such information.

### **How to withdraw your consent**

You may withdraw your consent to use or disclose your Personal Information at any time. To withdraw this consent, please contact us. Please note that withdrawing your consent may mean that we are unable to provide you with any Offerings or access to the Agro.Club Platform. If we receive such a request from you, we will let you know about the likely consequences of withdrawing or changing your consent.

### **Access to and correction of your information**

We strive to ensure that your Personal Information is accurate and up to date. To assist us, please contact us if any of the information you provided has changed or if you believe that the information we have is inaccurate.

You may request that we provide you with access to your Personal Information we have at any time. We will respond to your request as soon as possible after verifying your identity.

There are circumstances where we might be restricted from providing information. Examples include if we are legally restricted from doing so, or if your Personal Information is combined

with other personal information and cannot be reasonably untangled. If we cannot provide you with your personal information, we will detail our reasons in writing.

### **Privacy policy updates**

This policy will be reviewed periodically to take into account new laws and/or changes to our operations. We reserve the right to make changes. Should we make any changes, we will post an updated version on our Website or App. Your use of our Website and App constitutes your acceptance of this Privacy Policy and any update we may make. We encourage you to review this Privacy Policy, including for any updates, on a regular basis.

### **Contacting us**

Your input, feedback and concerns are important to us. We want to work with you to make sure the Agro.Club Platform works best for you. If you have any questions about this Privacy Policy, our privacy practices, or your Personal Information, please email us at [hello@agro.club](mailto:hello@agro.club) or write to:

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