

YARA DIGITAL FARMING PRIVACY POLICY

Last updated: 08 February 2019

1. SCOPE

Yara International ASA and its affiliates (**Yara**) take the protection of your personal data seriously. We want you to feel safe in using our products. This Privacy Policy describes our privacy practices, and your rights, as to the personal data that we collect and use in connection with our digital farming solutions. Please make sure to also consult the [Yara Digital Farming Terms](#) which govern your use of the solutions.

1.1. OUR SOLUTIONS

Our Solutions aim to improve farming methods and activity through innovative technology and connected tools. For example, our Solutions can assist you with farm management, crop and field analysis, and agronomic decisions.

Our digital farming solutions (**Solutions**) include:

- (a) Websites that are owned by us or Yara-branded, and that link to this Privacy Policy.
- (b) Online or downloadable software.
- (c) Mobile applications.
- (d) Hardware which may be linked to our software or mobile applications, and connected to the Internet.
- (e) HTML-formatted email messages that link to this Privacy Policy.
- (f) Our social media pages and applications that we administer.
- (g) Events (such as trade shows or networking events) that relate to our Solutions.

1.2. YOUR PERSONAL DATA

Personal data is any information that enables us to identify you as an individual. For example, this can be your name or shipping address, but also your purchase history or job title. The categories of personal data that we collect or obtain include:

- (a) Contact details (for example, name, postal address, email, telephone number, emergency contact details).
- (b) Personal details (for example, demographic characteristics, including birthdate and gender).
- (c) Transaction data (for example, transactions and agreements, purchase history, shipping and billing information).
- (d) Financial data (for example, bank, card and account details, and other payment related information).
- (e) Farming activity (for example, tasks and agronomic decisions).
- (f) Device and software data (for example, device-ID, operating system and corresponding version, specific use data and patterns).
- (g) Relationship data (for example, support requests, ratings and feedback).
- (h) Social media account data (for example, social-media account ID and posts).

Such personal data relates to any individual who purchases, uses or is involved with our Solutions. This includes:

- (a) Customers who install or purchase our Solutions, including individual farmers, distributors and retailers.
- (b) Users who employ our Solutions.
- (c) Partners who install and/or sell our Solutions.
- (d) Third party service providers who assist in the marketing or operating of the Solutions.
- (e) Employees and representatives of the above categories persons.

If you provide to us any personal data of another person, you must ensure that you are authorized to do so and that such person is informed about this Privacy Policy. For certain Solutions, we may, but are not obliged to, provide you with template privacy release forms to assist you in providing necessary information to such persons, for example to your contracting party as part of a rental contract management tool. Some Solutions allow you to invite a friend or contact to a Solution or feature, for example to share content with them or for collaboration purposes. Please use this functionality responsibly, and refrain from sending requests to persons who may not reasonably expect to receive and consent to them.

2. HOW WE USE YOUR PERSONAL DATA

2.1. PURPOSES FOR ALL SOLUTIONS

We use your personal data for:

(a) **Providing the functionality of the Solutions and customer support**

- Provide the Solutions to you, such as allowing access to your account.
- Complete and record your transactions.
- Ship items and hardware you order, such as sampling kits and measurement devices.
- Provide you with, and enable you to generate, agronomic reports and tips.
- Provide you with customer service and technical assistance (for example, installation, maintenance and breakdown assistance).
- Send you administrative information, such as changes to our terms and policies.
- Provide training to you regarding our Solutions.
- Respond to your inquiries and requests, for example when you send us questions or suggestions.

We do this pursuant to our contractual relationship with you or to comply with a legal obligation.

(b) **Providing you with marketing materials**

- Send you marketing communications and offer other materials that we believe may be of interest to you, such as to send you newsletters and personalized offerings.
- Share information with other marketers to permit them to send you marketing communications, consistent with your choices.
- Enable the posting of comments and testimonies about you on our websites and other parts of our Solutions.

We do this with your (opt-in/out) consent, or where we have a legitimate interest.

(c) **Providing you with promotional opportunities and facilitate social sharing**

- Allow you to participate in promotions.
- Facilitate social sharing functionality if you choose to do so.

We do this to manage our contractual relationship with you, with your consent, or where we have a legitimate interest. Additional rules may apply to such promotions or social sharing. Please make sure to read those rules.

(d) **Conducting business reporting and offering tailored services**

- Analyze our customers' use of the Solutions in order to prepare aggregated trend reports.
- Provide you with tailored advice and agronomical tips.
- Allow our customers to participate in polls and surveys, so that we can improve our service offerings.

We do this with your consent or because we have a legitimate interest.

(e) **Accomplishing our business purposes**

- **Business intelligence**, such as compiling general market insights.
- **Product improvement**, to develop new products, or enhance our current products.
- **Governance and audits**, for example by implementing internal audits, business analysis, controls and reporting (for example, whistleblowing procedures).
- **Business transactions**, including a reorganization, merger, sale, joint venture, assignment, transfer or other disposition (**Business Transaction**). For example, in case of a merger with or acquisition by another company, we may be required to disclose personal data to that company.
- **Protect Yara assets**, for example for health and safety reasons, or to manage access rights and security (to prevent fraud, cyberattacks and identity theft).
- **Comply with legal obligations**, for example we need to retain invoices for accounting purposes, or disclose some data to comply with requests from public authorities.

We do this to manage our contractual relationship with you, comply with a legal obligation, and/or because we have a legitimate interest.

(f) **Aggregating and/or anonymizing personal data**

- We may aggregate and/or anonymize personal data so that it will no longer be considered personal data. We do so to generate other data for our use, which we may use and disclose for any purpose. We may do so for example after you close your account.

2.2. ADDITIONAL PURPOSES FOR SPECIFIC SOLUTIONS

(a) **Allow us to provide our customers with location and mapping features.**

- Agro Office includes features that use GPS-location data which customers can utilize for:
 - Field work management automation.
 - Driver and machine identification for each agronomical activity.
 - Real-time notifications via the Agro Office app.
 - “Find-me” function using built-in GPS in the Agro Office app.
 - Fleet management.
- Trecker includes features that use GPS-location data which customers can utilize for:
 - Fleet management: Trecker shows the current position of all machines in one clear map.
 - Cooperation and work management: Through the Trecker mobile application, navigational tools can help users locate a field, locate other users in the field, or other point of interest (for example, a weed infestation or game damage). Users can also pin location and share geo-notes.

We undertake this data processing pursuant to our contractual relationship with our customers.

Location based functionalities in the Agro Office and Trecker mobile applications are designed to be switched off automatically outside of working hours and during breaks. Additionally, GPS functionality can at all times be manually switched off within the Agro Office and Trecker application or through the device’s settings.

(b) **Allow us to provide our customers with telematics functionalities.**

- Agro Office includes features that our customers can utilize for fuel control, for example where, when and how much fuel is filled and consumed by each machine or driver (for more detail, see [here](#)).

We undertake this data processing pursuant to our contractual relationship with our customers.

(c) **Allow us to provide our customers with resource management functionalities.**

- Trecker includes features which customers can utilize for:
 - Work management and scheduling: Trecker mobile applications may help work off tasks.
 - Cost allocation: Trecker allows farm managers to assign tasks to different company units, and track their progression. When tasks are in progress, Trecker can automatically detect which resources are being used. This allows farm managers to evaluate which company unit worked how much for another one, which will assist the farm manager with individual cost allocation and offsetting.
 - Payroll management and generation of invoices, based for example on Trecker’s cost allocation and clocking features.

We undertake this data processing pursuant to our contractual relationship with our customers.

3. OTHER INFORMATION

Yara also collects and uses certain data which does not reveal your specific identity and does not relate to an identified or identifiable individual (**Other Information**). This information therefore does not qualify as personal data. We still want you to be aware of our practice in relation to such information.

Examples of what may constitute Other Information include:

(a) **Agronomic and business-related data**, such as:

- Fertilizer, field, soil and crop data (for example, type, amount, location and mapping, and yield).
- Other local and farming characteristics (for example, location and mapping, weather and farming conditions).

- Machinery data (for example, model, technical characteristics, location and associated tasks).
- (b) **Software and hardware data (for example, connection time and use trends).**
- (c) **Information collected through cookies, pixel tags and other technologies.**
- (d) **Anonymized or aggregated data.**

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with personal data. If we do, we will treat the combined information as personal data as long as it is combined.

Examples of ways in which we use Other Information include:

- (a) Generating nutrient map applications and acreage indexes.
- (b) Providing soil measurements.
- (c) Improving agronomic knowledge through regional nutrient analysis.
- (d) Research and development.
- (e) Product improvement.

4. CONTACTING US

Yara International ASA is the company responsible for this Privacy Policy. The local Yara company with whom you contract for payment and shipping purposes may also be responsible for certain Solutions or regions (as set out in your contract), such as to process your order and invoice, and manage your contractual relationship (including providing you marketing materials). If you have any questions about this Privacy Policy, please contact us at dataprivacy@yara.com or Drammensveien 131, 0277 Oslo, Norway, Tel: +47 2415 7000.

YOUR RIGHTS

To the extent provided by applicable law, you may be entitled to request:

- (a) **Right of access**
 - To obtain confirmation from us as to whether or not we hold personal data about you, access such data and other information in regard to such data.
 - To obtain a copy of your personal data.
- (b) **Right of rectification**
 - The modification of personal data if they are incorrect or incomplete.
- (c) **Right to deletion**
 - The deletion of personal data under certain instances, for example where you consented to their use and have since withdrawn your consent, or where they are illegally used.
- (d) **Right to restriction**
 - The limitation of the use of personal data under certain circumstances.
- (e) **Right to portability**
 - The receipt of the personal data which you provided to Yara, in a structured, commonly used and machine-readable format.
 - Transmitting such personal data, or having them transmitted where technically feasible, to another company responsible for their use, under certain circumstances.
- (f) **Right to object or opt-out**
 - To object to the use of your personal data under certain circumstances, including in relation to direct marketing and where your personal data are used based on a legitimate interest of Yara. If you would like to opt-out from any direct marketing, you can do so by clicking on the “unsubscribe” button in the messages you receive.
- (g) **Right to withdraw consent**
 - To withdraw your consent at any time if the use of your personal data is based on consent. Note that withdrawing your consent will not make the use of your data before your withdrawal unlawful.

If you would like to exercise your rights, do not hesitate to contact us at dataprivacy@yara.com. Please note that the

rights above may be restricted in line with applicable law. You may also put in a complaint with a data protection authority for your country, or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available [here](#). The responsible supervisory authority for Yara International ASA is Datatilsynet, P.O. Box 458 Sentrum NO-0105 Oslo, postkasse@datatilsynet.no.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

5.1. WHICH THIRD PARTIES HAVE ACCESS TO PERSONAL DATA

(a) Group companies of the Yara International ASA group, for the purposes set out in this Privacy Policy

- Optimizing our shared processes. Within a group of companies, it is sometimes necessary to use and leverage resources effectively. In this context, we support each other within our group in optimizing our shared processes.
- Other cross-affiliate initiatives, such as research and development, marketing and finding new prospects, and other purposes as set out in the Yara Data Privacy Directive available [here](#).

(b) Service providers to facilitate services they provide to us

- These services include hosting data, processing payments, delivering shipments, email delivery, distribution, customer support and technical assistance, web analytics, IT performance monitoring, customer relationship management, evaluating, running and optimizing user experience or our growth campaigns, polls and surveys, legal compliance, as well as to secure our business operations, such as identifying and resolving malfunctions.

(c) Public authorities where disclosure is appropriate

- To address a dispute with a third party.
- When we respond to law enforcement requests and orders.
- To provide information we believe is important.

(d) Partners and commercial relationships to accomplish our business with them

- In connection with collaboration initiatives, for example as part of the sale and distribution process.
- In connection with a sale or Business Transaction. We have a legitimate interest in disclosing or transferring your personal data to a third party in the event of a Business Transaction.
- To permit them to send you marketing communications, consistent with your choices.

(e) Third parties with whom you share personal data through the Solutions

- Some Solutions may enable you to grant access to or share your personal data with other individuals or organizations in relation to the Solutions, for example to advisors to assist you in decision-making, consultants, distributors, machinery manufacturers and social media.
- If you connect your Solution with your social media account, you will share information with your friends associated with your social media account, with other users, and with your social media account provider. By doing so, you authorize us to facilitate this sharing of information, and you understand that the use of shared information will be governed by the social media provider's privacy policy.

As well as where otherwise prescribed to comply with applicable law and regulations, enforce our (and our representatives' and group's) rights, terms and conditions, privacy, safety or property.

5.2. WHERE WE TRANSFER YOUR PERSONAL DATA

Your personal data may be stored and processed in any country where we have facilities or in which we engage service providers, including in countries outside the European Economic Area (EEA) which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have sought to put in place adequate measures to protect your personal data.

- (a) For transfers within the Yara group of companies, we have set up the Yara Data Privacy Directive for Customer, Supplier and Business Partner Data which form a part of Yara's Binding Corporate Rules. The Yara Data Privacy Directive is [here](#).
- (b) Service providers outside the EU/EEA are requested to ensure transfers are based on either by Binding Corporate

Rules, standard contractual clauses recognized as valid by EU legislation or, for transfers to the U.S., the EU-US Privacy Shield. You may obtain a copy of these measures by contacting us as set out in Section 4 of this Privacy Policy.

5.3. THIRD PARTY SERVICES

Some Solutions enable you to obtain certain services from third parties. For example, it may be possible to:

- (a) Make a payment through the Solutions.
- (b) Access weather forecast or GPS provided by others.
- (c) Share content with social media.
- (d) Procure Solutions through a third party distributor.
- (e) Export and import information with machinery manufacturers, for example for easier field tracing.
- (f) Grant third parties access to your personal data, such as advisors who assist you in decision-making.

Where you do so, your personal data may be collected by those third parties, and not by us. We are not responsible for the privacy and security practices of such third parties, which are subject to their privacy policy, rather than this Privacy Policy.

5.4. PUBLIC FORUM

By using the Solutions, you may choose to disclose personal data on message boards, blogs and other services to which you are able to post information (including our social media pages). Please note that any information you post or disclose through these services will become public, and may be available to other users and the general public. To request the removal of your personal data from our blog or community forum, contact us (see Section 4). In some cases, we may not be able to remove your personal data or some content (if, for example, it is reposted by another user).

6. HOW WE SOURCE AND RETAIN YOUR PERSONAL DATA

We and our services providers collect personal data from various sources such as:

- (a) **Through the Solutions**
 - We collect personal data through the Solutions, for example, when you subscribe to a Solution, set up a user profile or interact with our connected devices.
- (b) **Offline**
 - We collect personal data from you offline, for example when you attend our events, or contact our customer service.
- (c) **From other sources**
 - We obtain data from other sources, for example
 - Publicly available databases (to the population at large, or to specific relevant groups such as the farming community), for example to improve land consolidation.
 - Your employer or public authorities as part of enabling the Solutions.
 - Commercial partners who sell or install the Solutions, when they share the personal data with us.

We retain your personal data for as long as needed or permitted in light of the purpose(s) for which they were obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- (a) The length of time we have an on-going relationship with you and provide the Solutions to you (for example, for as long as you have an account with us or keep using the Solutions), or to enable you to conduct your activities and meet your retention requirements. For example, as a rule of thumb regarding customer personal data, we seek to re-assess the need to retain your data couple year after you cease to be a registered customer (for example, to allow us to answer complaints or inquiries that may still arise). However, there are also other factors that may influence that period as set out below.
- (b) Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them).
- (c) Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

7. SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive personal data (for example, social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on the Solutions.

8. COOKIES

Our Solutions may use cookies and similar technologies. This section describes our practices in that respect.

8.1. WHAT ARE COOKIES AND SIMILAR TECHNOLOGIES?

Cookies are a standard feature of websites that allow us to store small amounts of data on your computer or device about your visit to our Solutions. Cookies help us learn for example which areas of our website are useful and which areas need improvement. For this purpose, we also use technologies similar to cookies, such as pixel tags.

You can choose whether to accept the use of cookies and similar technologies in general by changing the settings on your browser, or by changing specific settings for the Solution (as set out in Section 9.3). However, if you disable cookies and similar technologies, your experience on the Solutions may be diminished and some features may not work as intended.

8.2. WHAT COOKIES AND SIMILAR TECHNOLOGIES DO WE USE?

Below, we identify the different types of cookies and similar technologies that are used on our Solutions. To the extent that personal data are collected through cookies, the other Sections of the Privacy Policy apply and complement this Section 9.

- (a) **Essential Cookies.** Essential cookies enable you to navigate the Solutions such as our websites and to use their services and features. Without these absolutely necessary cookies, the website for example will not perform as smoothly for you as we would like it to and we may not be able to provide the website or certain features. Such cookies include for example those to remember what you place in your shopping cart or authenticate you before signing up to your Yara account.
- (b) **Preference Cookies.** Preference cookies collect information about your choices and preferences, and allow us to remember language, age, communication preference and other local settings, and customize our Solutions accordingly.
- (c) **Social Media Cookies.** Social media cookies collect information about social media usage. They enable to perform market research or marketing.
- (d) **Analytics Cookies.** Analytics cookies collect information about your use of our Solutions, such as our websites and enable us to improve the way they work. For example, analytics cookies show us which are the most frequently visited pages on our website, time spent and links clicked on pages or what users like and do not like, help us record any difficulties you have with the website, and show us whether our advertising is effective or not. This allows us to see the overall patterns of usage on the website, rather than the usage of a single person. We use the information to analyze website traffic, but we do not examine this information for individually identifying information.
- (e) **Advertising Cookies.** Advertising cookies are set to display targeted promotions or advertisements based upon your interests on the Solutions or to manage our advertising. These cookies collect information for example about your activities our websites and other sites to provide you with targeted advertising. These cookies enable us for example to track if you are a current customer and when the last time was that you engaged with us, so that we can follow-up, or to find new customers and prospects.
- (f) **Google Analytics.** Google Analytics service is provided by Google, Inc.. We use Google Analytics to collect anonymized statistics in order to improve our Solutions. You can learn about Google's practices by going to [Google Analytics and privacy](#), and opt out of them by downloading the [Google Analytics Opt-out Browser Add-on](#). We have taken the following measures to protect the data collected through Google Analytics:
 - We have concluded a data processing agreement with Google about how Google may process the data collected through Google Analytics.
 - We have configured Google Analytics settings to mask the last octet of user IP addresses.
 - We have configured Google Analytics to not share data with third parties.
 - We do not use other Google services in conjunction with Google Analytics.
- (g) **Pixel tags.** Pixel tags (also known as web beacons and clear GIFs) are used to, among other things, track the actions of users of our websites, measure the success of our marketing campaigns, and compile statistics about usage of our websites and response rates.
- (h) **Browser or Device Information.** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen

resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the website you are using. We use this information to ensure that our websites and Solutions function properly.

8.3. HOW TO MANAGE COOKIES AND SIMILAR TECHNOLOGIES

You can change your settings for cookies and similar technologies as described in the documentation pertaining to each Solution. In addition, you can refuse or accept cookies from our websites at any time by activating the settings on your browser. Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider's website via your help screen. Please refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for information on commonly used browsers. Please be aware that if cookies are disabled, not all features our websites may operate as intended.

If you want to clear all cookies left behind by the websites you have visited, here are links where you can download three programs that clean out tracking cookies:

- (a) http://www.lavasoftusa.com/products/ad-aware_se_personal.php
- (b) <http://www.spybot.info/en/download/index.html>
- (c) <http://www.webroot.com/consumer/products/spysweeper/>

9. CHANGES TO OUR PRIVACY POLICY

We may update our Privacy Policy from time to time to meet our business requirements and/or comply with statutory provisions. You can see the date of the latest update at the top of this Privacy Policy. If we make material or substantive changes to one of our privacy policies, we will seek to actively bring those changes to your attention.