

# **Privacy Policy**

Last updated: February 15, 2021

At Agrinorm Ltd., a Swiss corporation with its principal place of business at Hafnerstrasse 31 in 8005 Zurich, Switzerland (the "Company", "Agrinorm", "We", "Us" or "Our") We highly value Your privacy (the "User", "You" or "Your") and thus put the necessary measures in place to protect Your personal information. We comply with the Swiss Federal Data Protection Act (DPA), the Swiss Federal Data Protection Ordinance (DPO), and the General Data Protection Regulation (GDPR).

In this Privacy Policy We describe Our policies and procedures on the collection, use and disclosure of Your information when You visit Agrinorm's website or use Our Application. We also inform You about Your privacy rights and how the applicable law protects You.

You agree to this Privacy Policy and particularly to the collection and use of information in accordance with this Privacy Policy.

We reserve the right to modify this Privacy Policy at any time, in our free discretion, without giving reasons. We will give due notice of any modifications of the Privacy Policy.

## **Definitions**

The following definitions apply to this Privacy Policy:

means a unique account created for You to access our Service or parts of our Service.

**Account** means a unique account created for You to access our Service or parts of our Service.

**Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

**Application** means the software program(s) provided by the Company and downloaded or accessed by You on any electronic device.

**Company** (referred to as either the "Company", "Agrinorm", "We", "Us" or "Our") refers to Agrinorm Ltd., a Swiss corporation with its principal place of business at Hafnerstrasse 31, 8005 Zurich, Switzerland. For the purpose of the applicable laws, the Company is the Data Controller.

**Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

**Data Controller** refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

**Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

**Personal Data** means any information relating to You in accordance with the applicable data protection laws. such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

**Service** refers to the Application or the Website or both.

**Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the applicable data protection laws,

Service **Providers** are considered Data Processors.

**Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.

**Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to https://www.agrinorm.ai.

**You** (referred to as either "You", the "User", "You" or "Your") means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable. Under the applicable data protection laws, You can be referred to as the Data Subject or as the User as You are the individual using the Service.

## **Types of Data Collected**

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Bank account information in order to pay for products and/or services within the Service
- Usage Data

When You pay for a product and/or a service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify Your identity. Such information may include, without limitation:

- Date of birth
- Passport or National ID card
- Bank card statement
- Other information linking You to an address

#### Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Information from Third-Party Social Media Services

The Company may allow You to create an account and log in to use the Service through Third-party Social Media Services such as:

- Google
- Facebook
- LinkedIn

If You decide to register through or otherwise grant Us access to a Third-Party Social Media Service, We may collect Personal data that is already associated with Your Third-Party Social Media Service's account, such as Your name, Your email address, Your activities or Your contact list associated with that account.

You may also have the option of sharing additional information with the Company through Your Third-Party Social Media Service's account. If You choose to provide such information and Personal Data, during registration or otherwise, You are giving the Company permission to use, share, and store it in a manner consistent with this Privacy Policy.

Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Information regarding Your location
- Information from Your Device's phone book (contacts list)
- Pictures and other information from Your Device's camera and photo library

We use this information to provide features of Our Service, to improve and customize Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on Your device.

You can enable or disable access to this information at any time, through Your Device settings.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless You have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Flash Cookies.** Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how You can delete Flash Cookies, please read "Where can I change the settings for disabling, or deleting local shared objects?" available at <a href="https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main">https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main</a> Where can I change the settings for disabling or deleting local
  - flash.html#main Where can I change the settings for disabling or deleting local shared objects
- **Web Beacons**. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. We use both Session and Persistent Cookies. For more information about the cookies We use and Your choices regarding cookies, please visit our Cookies Policy.

## **Using Your Personal Data**

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service,** including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- For the performance of one or several contracts: the development, compliance and undertaking of the contract(s) for the products, items or services You have purchased or licensed or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the

- functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news, special offers and general information about other goods, services and events which We offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a
  merger, divestiture, restructuring, reorganization, dissolution, or other sale or
  transfer of some or all of Our assets, whether as a going concern or as part of
  bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us
  about our Service users is among the assets transferred.
- For other purposes in the context of the performance of Our contract(s) with You and improvement of Our Services: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and Your experience.

# **Sharing Your Personal Data**

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, if any, in which case We will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions or improve Our Services.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

## **Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

### **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing, such as Our Service Providers, are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

## **Disclosure of Your Personal Data**

#### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred.

#### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## **Security of Your Personal Data**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## **Processing of Your Personal Data**

To provide and improve the Service We may collaborate with Service Providers. Service Providers have access to Your Personal Data only to perform their tasks on Our behalf and are obligated not to disclose or use it for any other purpose. Moreover, We process Your Personal Data for the following purposes:

#### **Analytics**

We may use Our Service Providers to monitor and analyze the use of our Service. Our Service Providers include, but are not limited to the following:

#### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of Our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made Your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript from sharing information with Google Analytics about visits activity.

You may opt-out of certain Google Analytics features through Your mobile device settings, such as Your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

#### **Firebase**

Firebase is an analytics service provided by Google Inc.

You may opt-out of certain Firebase features through Your mobile device settings, such as Your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

We also encourage You to review the Google's policy for safeguarding Your data: <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a>.

For more information on what type of information Firebase collects, please visit the How Google uses data when You use our partners' sites or apps webpage: <a href="https://policies.google.com/technologies/partner-sites">https://policies.google.com/technologies/partner-sites</a>.

#### Mixpanel

Mixpanel is provided by Mixpanel Inc.

You can prevent Mixpanel from using Your information for analytics purposes by opting-out. To opt-out of Mixpanel service, please visit this page: <a href="https://mixpanel.com/optout/">https://mixpanel.com/optout/</a>.

For more information on what type of information Mixpanel collects, please visit the Terms of Use page of Mixpanel: <a href="https://mixpanel.com/terms/">https://mixpanel.com/terms/</a>.

#### **Email Marketing**

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us. We may use Email Marketing Service Providers to manage and send emails to You.

#### **Payments**

We may provide paid products and/or services within the Service. In that case, We may use third-party services for payment processing (e.g. payment processors). We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information. When You use Our Service to pay a product and/or service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify Your identity.

#### Other Purposes set out in this Privacy Policy

We will process Your Personal Data for other purposes as set out in this Privacy Policy.

If You have given Us Your consent to process Your Personal Data for certain purposes (for example when registering to receive newsletters), We will process Your Personal Data within the scope of and based on this consent, unless We have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

# **Legal Basis for Processing Personal Data under GDPR**

We may process Personal Data under the following conditions:

- Consent: You have given Your consent for processing Personal Data for one or more specific purposes.
- Performance of a contract: Provision of Personal Data is necessary for the performance of a contract with You and/or for any pre-contractual obligations thereof.
- Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.

- Vital interests: Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## Your Rights under the applicable Data Protection Laws

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights under the applicable data protection laws.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- Request access to Your Personal Data. The right to access, update or delete the
  information We have on You. Whenever made possible, You can access, update or
  request deletion of Your Personal Data directly within Your account settings section.
  If You are unable to perform these actions Yourself, please contact Us to assist You.
  This also enables You to receive a copy of the Personal Data We hold about You.
- Request correction of the Personal Data that We hold about You. You have the right to have any incomplete or inaccurate information We hold about You corrected.
- Object to processing of Your Personal Data. This right exists in cases where there is something about Your particular situation, which makes You want to object to Our processing of Your Personal Data. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- Request erasure of Your Personal Data. You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- Request the transfer of Your Personal Data. We will provide to You, or to a third-party
  You have chosen, Your Personal Data in a structured, commonly used, machinereadable format. Please note that this right only applies to automated information
  which You initially provided consent for Us to use or where We used the
  information to perform a contract with You.
- Withdraw Your consent. You have the right to withdraw Your consent on using Your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

## **Exercising of Your Data Protection Rights**

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that We may ask You to verify Your identity before responding to such requests. If You make a request, We will try Our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

#### **Minimum Age**

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your Children has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 18 without verification of parental consent, We take steps to remove that information from Our and Our Service Provider's servers.

#### **Contact Information**

If You have any questions about this Privacy Policy, You can contact Us by email: <a href="mailto:admin@agrinorm.ai">admin@agrinorm.ai</a>