Gallagher Animal Performance, Ag Devices App - Privacy Statement

Revision 2.3 – October 2021

1. Introduction & Scope

This Privacy Statement applies to the Animal Performance, Ag Devices mobile and web applications as well as supporting Cloud Services, supplied by Gallagher Group Limited.

2. Personal Information, Collection and Uses

- 2.1. We collect your personal information that you provide to us when you register for our Cloud Services, and when you communicate with us by email.
- 2.2. Marketing agencies

We do not share your personal information with marketing agencies. Your information will not be sold, exchanged, transferred, or given to any other company without your consent. With your consent we will share your personal information with Gallagher partners in your region.

2.3. Third-party service providers

When you opt for a free trial of a paid service or pay for the service, we send your first name, last name, and email-id to our subscription management service provider, Chargebee (https://www.chargebee.com/).

When you pay for the service by credit card payment, card information is provided directly, via this website or the app suite, into a PCI-DSS compliant payment processing service (Chargebee), (<u>Chargebee</u> is internally integrated with Stripe payment gateway (<u>https://stripe.com</u>) for processing the payment, and Taxjar (<u>https://www.taxjar.com/</u>, US, Canada only) for the tax calculation on the service fee. We do not process or store your card information ourselves.

Chargebee's privacy policy can be found

at https://www.chargebee.com/privacy, Taxjar

at https://www.taxjar.com/privacy-policy, and Stripe

at <u>https://stripe.com/en-nz/privacy</u>.

Your personal data is securely stored by Amazon AWS Cloud Services and Chargebee.

When you receive an email and push notification it will be routed through Amazon and/or, Chargebee, the Google Firebase, and Apple servers.

- 2.4. Situations where we process your personal information
 - 2.4.1. Registration of your account with the Gallagher Animal Management App Suite.
 Registration will involve you providing your First Name, Last Name, and email address. Your regional location is auto detected from your IP address to enable features for your region and to select the right language.
 - 2.4.2. Paying for a service will involve you providing your country, billing address and contact information.
 - 2.4.3. Log data and troubleshooting

The app suite will collect logs to assist in troubleshooting should an error occur. This includes information about your activity and contain information regarding your IP and browsing history, payment gateway transaction info, and application request logs (for troubleshooting).

2.4.4. Broadcast notifications and message handling

The app suite will allow you to receive push notifications to your device so you can be informed of relevant, sometimes pre-defined, data points regarding varying aspects of your app suite services.

2.4.5. Cookies and Google Analytics

Whenever the Gallagher Animal Management app suite communicates with the Gallagher Cloud Services, in order to provide you services and to enable us to improve our products. we send the following information to Google and Amazon. Google and Amazon are our data processors in this case. Gallagher also uses this information in aggregated and anonymised fashion to provide customised services for your region, for example Animal compliance schemes like NAIT for New Zealand, NLIA for Australia.

- o Mobile device operating system (e.g. iOS or Android)
- o Operating system version (e.g. iOS 11.4.1)
- o Installed version of the mobile app (e.g. 11.0.0.74)
- o The last time your device connected to Gallagher Cloud Services.
- o Anonymised IP address will be used in Google Analytics.
- o The title of the app pages visited, and the actions performed are stored in aggregated and anonymised form.

- Although your IP address is sent, we do not store it. We store only the most recent copy of this information in the cloud, and we do not store history of your connections over time.
- o The legal basis for processing is contract.

3. Your Privacy Choices

We are processing your personal information to provide you a subscribed service. You can tailor marketing preferences, and you may tell us you do not want any marketing contact.

You can turn off cookies in your browser or on your phone or by opting out from your account <u>setting</u>.

You may access the personal information we hold about you.

You may ask us to correct any errors or delete any information we have about you.

You may opt out of any further contact from us.

To protect your privacy and the privacy of others we may have to verify you are who you say you are before we can give you access to, or change, information about you.

4. Cookies, Google Analytics, Web Beacons and Other Technologies.

Cookies are small text files that are placed in your browser by the websites you visit. They are widely used to help users navigate websites efficiently, to perform certain functions on the sites, and/or to provide site owners with information about how their sites are used.

We use cookies on our site where they are required for particular features to work – for example, if you are a logged in user, to allow you to remain logged in whilst you complete certain tasks.

Web Google Analytics cookies

We use tracking cookies with Google Analytics tool to analyse non-identifiable web traffic data to improve our services. This data is aggregated and cannot

personally identify you. If you prefer, you can opt out of the Google Analytics tracking cookies without affecting your ability to use our apps.

Web Session Cookie

Session cookies allow you to remain logged-in while you use our website. This cookie allows you to use other Gallagher web services without needing to relogin, this is called Single Sign On (SSO). You can disable this cookie in your browser setting.

Google Analytics for Firebase

Our phone apps use Google Analytics for Firebase to analyse non-identifiable app traffic data to improve our services. This data is aggregated and cannot personally identify you. If you prefer, you can opt out of this without affecting your ability to use our apps.

Change Cookie Settings

5. Cross-Border Transfers

We use cloud services from Amazon AWS on computer systems, hosted in Australia, for which we rely on a Data Processing Agreement including Standard Contractual Clauses to confirm the appropriate safeguards.

6. Children's Privacy

Our Service does not target anyone under the age of 16 ("Children"). We do not knowingly collect personal information from children under 16. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a child under age 16 without verification of parental consent, we take steps to remove that information from our servers.

7. Data Retention

Gallagher Cloud Services		
Personal Data	Retention Period	Reference

Gallagher Cloud Services		
Your first name	While you are subscribed to the service plus 1 year.	2.4.1
Your last name	While you are subscribed to the service plus 1 year.	2.4.1
Your email address	While you are subscribed to the service plus 1 year.	2.4.1
Billing Address	While you are subscribed to the service plus 1 year.	2.4.2
Credit Card details	Not collected	2.3
Location details	While you are subscribed to the service plus 1 year.	2.4.1
Log data (on device)	Collected. User can request Gallagher to remove any non-anonymised log data.	2.4.3
Your system messages	Collected stored in Google and Apple	2.4.4
Cookies, Google Analytics	Anonymised data Collected and stored in Google, Gallagher cloud.	2.4.5
IP address	Collected in logs for troubleshooting stored in Gallagher Cloud and Ivent Electric Imp Cloud.	2.4.5
Gallagher SAP CRM		
Customer service messages to Gallagher	Collected and stored in SAP CRM	2.1
Customer details and payment records	Collected and stored in SAP CRM (while subscribed +7 years)	2.1

8. Information Security.

Gallagher implements reasonable physical administrative and technical safeguards (such as system monitoring and encryption) to help us protect your personal information from unauthorised access, use and disclosure. We restrict access to your personal information to those employees who "need to know" it to provide services to you.

9. How to Reach Us.

Contact us via <u>privacy@gallagher.com</u> or by calling +64 7 838 9800 or write to Privacy Officer, Gallagher Group Limited, 181 Kahikatea Drive, Hamilton 3206, New Zealand.

10. Complaints.

In many countries, you have a right to lodge a complaint with the appropriate privacy or data protection authority if you have concerns about how we process your personal information.

We aim to resolve complaints quickly and informally. If you wish to proceed to a formal privacy complaint, we will need you to make your complaint in writing to our Privacy Officers, as above. We will then acknowledge your formal complaint within 10 working days.

If you are not satisfied with the responses from your site or from us you may contact the appropriate national privacy authority.

Note: under UK-GDPR, our nominated contact in UK is the Regional Manager of Gallagher Security (Europe) Ltd in the UK <u>privacy@gallagher.com</u>, whose supervisory authority is the Information Commissioner's Office (http://www.ico.org.uk).

Under GDPR, our nominated contact in Europe is Peter Tentij (<u>privacy.eu@gallagher.com</u>), whose supervisory authority is the Autoriteit Persoonsgegevens, Netherlands.

11. Changes and Updates to this Privacy Statement.

This Statement is effective from 8 Sept 2021 and supersedes all previous privacy statements.

We reserve the right to amend our Privacy Statement at any time, for any reason, without notice to you, other than posting the updated version.