

Privacy Policy

This Privacy Policy explains how Agroxchange Technology Ltd, located at: 9 Efon Alaye Street, Ijapo Estate, Akure, Ondo state Nigeria (collectively “Agroxchange Crop Monitoring”) uses and discloses your personal information. This Privacy Policy applies to any Agroxchange Crop Monitoring software or application (whether online, on a mobile device or downloadable), services and data feeds made available by Agroxchange Crop Monitoring (the “Service. The Service available at info@agroextech.com. Agroxchange Crop Monitoring has a right to use your data and the personal information collected in accordance with the [Terms of Use](#) by which Agroxchange Crop Monitoring offers you access to our software and services. Please read this Privacy Policy carefully before you use any of the Agroxchange Crop Monitoring services or products so that you will understand our practices and your options before you choose to share Client Data (defined below).

1. GATHERING OF INFORMATION

Registration Data. Agroxchange Crop Monitoring collects information about you during account set up and through your use of our data services, farm management and decision support software, precision agriculture services and software, as well as our technology platforms, applications, services, subscription to our newsletter, response to surveys, and purchases made through our platforms. When you’re not signed in to an Agroxchange Crop Monitoring Account, we store the information we collect with unique identifiers tied to the browser, application, or device you use.

Client Data. Some categories of data, such as agronomic data, plans or actual information related to planting, product use, recommendation and application, scouting, irrigation, harvesting, data files from machines that is imported by your behalf, information about a user’s land including digital shapefiles of field boundaries, farm management data, weather and climate data, which you elect to send to or receive through the Agroxchange Crop Monitoring System is collectively “Client Data”. By providing Client Data, you represent that you have the right to share it with us and to allow us to use and disclose it as explained in this Privacy Policy.

Cookies and Non-Personal Information. Non-Personal Information means any information that does not reveal your specific identity, including browser information; Information collected through cookies, pixel tags and other technologies; demographic information, excluding Personally Identifiable Information, and other information provided by you; aggregated or anonymized information; and information about your agricultural operation, such as records or practices related to seeds, soil, irrigation and herbicides, pesticides, and fertilizers; geospatial data or map imaging, or preferences concerning how you receive information. For more information on how we use cookies, please see the section below on Cookies.

IP Address, Mobile Device IDs and Location-Based Information. Your IP Address is a number that is automatically assigned to the computer, tablet or smartphone that you are using by your Internet Service Provider (ISP). An IP Address may be identified and logged automatically in our server log files whenever a user accesses our website, along with the time of the visit and the page(s) that were visited. When you access our software and services using a mobile device, we may collect and transmit unique device IDs and collect caller ID data, information about your

wireless carrier, the make, model, operating system and settings of your device and information about how you navigate within our platform.

Browser and Online Services. Certain information is collected by most browsers or automatically through your device when using a browser, such as your Media Access Control (MAC) address, computer type, screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the online services you are using.

Location Data. When you are using the Service, we may collect and process information about your location including IP address, GPS, sensor data from your devices, and other sensors that may provide us with information on nearby devices, WiFi access points, network access points, Bluetooth-enabled devices and cell towers. When you access our software and services using a mobile device, we may collect and transmit unique device IDs and collect caller ID data, information about your wireless carrier, the make, model, operating system and settings of your device and information about how you navigate within our platform.

Analytics. We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's and YouTube's practices by going to www.google.com/policies/privacy/partners/ and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. To view Google's and YouTube's privacy policy, please click here: <https://policies.google.com/privacy?hl=en>

Personally Identifiable Information. Personally Identifiable Information means any information that identifies you as an individual or can be used to identify or contact you, whether provided by you or others prior to or after implementation of this Privacy Policy, including name; postal address (including billing address); telephone or fax number; email address; farm, ranch or orchard address, permit number, Section/Township/Range/Base, business license or registration numbers, passwords; occupation/job title; IP addresses; device IDs; cookie IDs; and psychographic profiles based on customers' preferences, characteristics, or behavior; and includes personal information in accordance with the applicable legislation of your country.

Information Collected From Other Sources. We receive your Personal Information from other sources, for example:

- publicly available databases;
- joint marketing partners and event sponsors, when they share the information with us;
- entities to which we provide client services, which may include your employer;
- social media platforms.

Special Notification About Conference Calling or Webinars. Webinars offered as a service to users of the Service or services to facilitate conference calls ("Web Conferencing") are hosted by unaffiliated third-party vendors, and not by us. Our third-party vendors may require users to

provide Personally Identifiable Information. This Personally Identifiable Information includes name and email address. Please note that this Personally Identifiable Information is collected by our vendors and not by us. We encourage you to read the privacy statements of our vendors, which control how such vendors handle Personally Identifiable Information provided by you to register for the Webinars.

Control Use Of Personally Identifiable Information. You may withdraw your consent to the collection of your Personally Identifiable Information going forward by sending an email to info@agroextech.com to request deactivation of your account.

2. HOW WE USE INFORMATION AND DATA

Product Support and Improvement. Agroxchange Crop Monitoring may use data and information gathered to personalize applications and website content, facilitate your use of the application websites (for example, to facilitate navigation and the login process), avoid duplicate data entry, enhance security, identify software attack patterns, diagnose server problems, make product updates, product patches and fixes, determine and manage the effectiveness of our advertising and marketing, preserve information between sessions, improve website quality, calculate usage levels and evaluate page response rates. Geolocation technology such as GPS or Wi-Fi triangulation allows us to collect information about the exact location of your mobile device so that you may access personalized services and content. Additionally, we use Personally Identifiable Information about users of our Web Conferencing to track attendance, to facilitate future communication with such users, and for other purposes set forth in this Privacy Policy.

Processing of Transactions. Agroxchange Crop Monitoring may create, administer and communicate with you about your account (including any purchases and payments), use financial/credit card and payment information to accept online payments of license or contract fees, perform accounting, auditing, billing, reconciliation and collection activities, and other similarly situated third parties to complete the transaction.

Tailored Marketing. Agroxchange Crop Monitoring may communicate with you about products, services, events, surveys and promotions. Agroxchange Crop Monitoring may use other companies to provide e-mail delivery or place advertising on our websites or in our applications; Agroxchange Crop Monitoring does not control these companies' use of cookies. If you use our Service to sign up for special email offers from third-party advertisers, we will also share your email address and any other information you provided with your request with the advertisers you selected. We will not sell or rent your email address to unaffiliated third parties for their email marketing purposes, without your consent.

Mobile Information Sharing. Agroxchange Crop Monitoring may provide some personal data to third-party partners that are providing services essential to your mobile user experience or to access third party services that you contracted for. All requests are sent through your mobile carrier's network and your carrier may have access to it. Consult your carrier's privacy policies for additional information.

Protect Against Fraud. Agroxchange Crop Monitoring may use your personal information to verify your identity, to protect against unauthorized transactions, and to conduct investigations,

comply with and enforce applicable legal requirements or industry standards, and to ensure the safety of the websites, network services, information resources and employees.

Aggregated and Anonymous Information. We may collect and create non-user specific information, or anonymize information by removing any uniquely-identifiable information, on agricultural crops, crop protection chemicals, regional use, and other agricultural data in blind, collated, assembled or bundled reports which is referred to as “Aggregated Data”. Examples of Aggregated Data may include pest and disease reports for a geographic region, average yield in a county, average input costs for all growers in a geographic area, or a yield improvement estimates for a particular farming practice decision. We may use Aggregated Data and disclose it to third parties as we deem appropriate.

Crop and Product Use Data. When Agroxchange Crop Monitoring partners with an agricultural chemical supplier to develop a specific service or functionality within the Service, we share uniquely identifiable crop data with the sponsoring company to verify that products applications meet regulatory standards and report usage as mandated by law. Furthermore, when you instruct Agroxchange Crop Monitoring to share Client Data, commodity or location permit information, crop management product usage and application data with crop advisors, pest control advisors, applicators, harvesters, packers, processors, shippers, handlers, and crop buyers (each a “handler”), we share uniquely identifiable crop data with the handler.

To Comply with Legal Requirements. We may disclose Client Data if we believe it is reasonably necessary to:

- Comply with enforceable or valid legal process in criminal investigations (e.g., subpoenas, warrants) or to protect our legal rights, such as pursuing available remedies or limiting the damages we may sustain;
- Enforce or apply the Terms of Use; or
- Protect the security or integrity of the Service or in connection with an investigation of suspected or actual illegal activity, including to meet national security or law enforcement requirements.

Civil Litigation. Agroxchange Crop Monitoring is committed to the policy that you own your data which is merely stored by Agroxchange Crop Monitoring for your use. Because you own your data, we are unable to provide information garnered through your account to respond to subpoenas for documents and business records in civil litigation. If we are compelled to provide your data including Client Data in any civil litigation matter, we will bill you for our costs to search and produce electronic data at our published rate. Note that your crop records may be available to civil litigants from other sources such as state regulatory departments, county agricultural commissioner’s offices with whom you share data.

3. COOKIES AND COLLECTION TECHNOLOGY

Cookies. Cookies are pieces of information stored on your computer that allow us to collect information such as browser type, time spent on using our, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, display information more effectively, to improve functionality, and to personalize your experience while using the Service.

Essential Cookies. Some cookies serve an essential function and the websites cannot work properly without them. Where such essential cookies are used, they cannot be disabled.

Browser and Flash Cookies. Other cookies serve a functional purpose and improve the user experience of the websites. We use browser and flash cookies to tell us, for example, whether you've visited us before, and to help us identify site features in which you may have the greatest interest. Browser and flash cookies may enhance your online experience by saving your preferences while you are visiting a particular site so that you do not need to reset them each time you visit the website. You can decline any browser cookie through your browser however, without browser cookies you may not be able to take full advantage of all our website features. Similar to browser cookies, you may not be able to take full advantage of all website features once you have disabled Flash cookies.

Declining Cookies. Most browsers allow you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. If you do not accept cookies, you may experience some inconvenience in your use of the online services. Unless you disable such technologies, by using our website and online services, you agree that we can place these types of cookies and related technologies on your device.

Web Beacons. Some types of cookies collect aggregate information which help us to improve our websites by providing information, for example, on loading errors and the most visited web pages. Certain pages on the Service may contain web beacons (also known as Internet tags, pixel tags, transparent GIFs, or clear GIFs) which are small strings of code that embed a small graphic image (usually visible) on a web page or in an email or advertisement. Agroxchange Crop Monitoring uses web beacons to store to display content to visitors such as previously-set cookies, the time and date that you viewed the page embedded with the beacon and a description of that page and to generate statistics regarding web traffic and trends. Web beacons cannot identify you as an individual.

4. THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties. This includes any third party operating any website or service to which the Services link. The inclusion of a link does not imply an endorsement by Agroxchange Crop Monitoring of the linked site or service. In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personally Identifiable Information you disclose to other organizations through or in connection with the apps or our social media.

5. INFORMATION STORAGE AND DATA SECURITY

Data Security. All Personally Identifiable Information supplied to Agroxchange Crop Monitoring is stored on robust and reliable systems that are continually monitored and updated as per the latest commercially reasonable security practices to protect for data protection against loss, theft and misuse, as well as unauthorized access, disclosure, alteration and destruction.

However, no security system is impenetrable. We cannot guarantee the security of our databases or the security during transmission to us of the information you supply over the Internet. You can help us by taking precautions to protect your personal information when you are on the Internet. Use a strong, unique password and make sure to use a secure web browser.

Data Retention. We may retain your Personally Identifiable Information and Client Data to fulfill the purposes outlined in this Privacy Policy for as long as needed, as allowed or as required by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions or communications for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

6. PRIVACY RIGHTS APPLICABLE TO CALIFORNIA RESIDENTS

California law requires that we provide you with a summary of your privacy rights under the California Consumer Privacy Act of 2018 (“CCPA”). As required by CCPA, this Privacy Policy identifies the categories of Personally Identifiable Information that we collect through our website about individual consumers who use or visit our website and the categories of third-party persons or entities with whom such Personally Identifiable Information may be shared. CCPA further defines “personally identifiable information” as individually identifiable information about an individual consumer collected online by us from an individual and maintained by us in an accessible form, and may include any of the following: (1) a first and last name; (2) a home or other physical address, including street name and name of a city or town; (3) an email address; (4) a telephone number; (5) a social security number; (6) any other identifier that permits the physical or online contacting of a specific individual; and (7) information concerning a user that the web site collects online from the use, and maintains in personally identifiable form, in combination with an identifier described within this privacy policy.

Your Rights and Choices. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request); or
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing (i) sales, identifying the personal information categories that each category of recipient purchased; and (ii) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights. You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. 1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. 3. Debug products to identify and repair errors that impair existing intended functionality.
4. 4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. 5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. 6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. 7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. 8. Comply with a legal obligation.
9. 9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights. To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by:

- Emailing us at info@agroextech.com
- by mail at the following address:

Agroxchange Technology Ltd
9 Efon Alaye Street, Ijapo Estate, Akure,

Ondo state, Nigeria

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format. We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination. We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services

7. PRIVACY RIGHTS FOR INDIVIDUALS SUBJECT TO THE AFRICAN UNION GENERAL DATA PROTECTION REGULATION

Users who are within the African Union are entitled to certain principles and rules set forth under the General Data Protection Regulation ("GDPR") regarding personal data, including important rights which include your right to:

- access to your personal data
- require Agroexchange Crop Monitoring to correct, update, or remove (in certain situations) your personal information
- receive personal data you have provided to us, in a structured, commonly used and machine-readable format with the right to transmit those data to a third party in certain situations

- object at any time to processing of personal data concerning you for direct marketing and in certain other situations
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the Nigeria Information Commissioner's Office on rights under the General Data Protection Regulation. To review your personal information collected by Agroxchange Crop Monitoring, please address your questions in writing to Agroxchange Crop Monitoring Privacy Officer at the address at the end of this Privacy Policy or by e-mail to info@agroexotech.com. To protect your privacy and security, we will take reasonable steps to verify your identity before granting access to information or making corrections.

Personal data of African Union users processed by Agroxchange Crop Monitoring or by third parties on behalf of Agroxchange Crop Monitoring may fall into the following legal bases:

- **Legal obligation.** In certain jurisdictions, Agroxchange Crop Monitoring must provide personal data when submitting crop records to government bodies. We must also keep records when an individual exercises their rights granted under GDPR.
- **Consent.** All processing that falls under consent may be reviewed, granted, and revoked within your account.
- **Legitimate interest.**

Agroxchange Crop Monitoring may process African Union user's personal data for the following business purposes:

- processing related to crop records and other agricultural operations. This includes determining relevant history, the import or management of client data, generating records, using satellite imagery, and sending information to relevant recipients through email, SMS or APIs
- managing your account, including authentication and authorization.
- personalizing the Service for your account
- ensuring the accuracy of any third party integrations that you have set up
- using location data to mark or identify nearby items while you're out in the field
- remotely connecting to vehicles out in the field
- managing customer relationships, including billing, contracts, support, and training
- managing of and marketing the Service to potential customers
- auditing the Service for information security purposes.
- identifying and fixing issues with the Service
- communication within Agroxchange Crop Monitoring
- providing insights to prioritize feature support and improve the Service's user experience.

Agroxchange Technology Ltd complies with the AU-Nig. Privacy Shield Framework as set forth by the Federal Ministry of Commerce and Industry regarding the collection, use, and retention of personal information transferred from the African Union to Nigeria. Agroxchange Technology

Ltd has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Within the scope of this privacy notice, if a privacy complaint or dispute cannot be resolved through Agroxchange Crop Monitoring's internal processes, Agroxchange Crop Monitoring has agreed to participate in the [VeraSafe Privacy Shield Dispute Resolution Procedure](#). Subject to the terms of the VeraSafe Privacy Shield Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you.

8. PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT OF CANADA

To challenge Agroxchange Crop Monitoring's compliance with the Personal Information Protection and Electronic Documents Act of Canada, please address your concerns in writing to Agroxchange Crop Monitoring Privacy Officer at the address at the end of this Privacy Policy or by e-mail to info@agroextech.com. To protect your privacy and security, we will take reasonable steps to verify your identity before granting access to information or making corrections. If you are not satisfied with our response to your challenge, you may within six months submit a complaint to the Federal Privacy Commissioner. Appeals of the commissioner's decisions may be made to the Federal Court of Canada within 45 days after the commissioner's report is sent.

9. PRIVACY RIGHTS APPLICABLE TO OTHER NIGERIA STATES

This Privacy Policy has been drafted to comply with privacy laws enacted in states other than California. Consumers may review and request changes to their covered information in accordance with the law of the state where you work, normally live or where we collect any data from you. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months.

10. PRIVACY RIGHTS FOR INDIVIDUALS SUBJECT TO NIGERIAN PRIVACY PRINCIPLES

We will only collect Personally Identifiable Information about you in accordance with the Nigerian Privacy Principles in the Privacy Act. We will only collect Personally Identifiable Information from you unless it is unreasonable or impracticable to do so. Agroxchange Crop Monitoring does not collect sensitive information (as defined in the Privacy Act).

An individual may request Agroxchange Crop Monitoring to give access to Personally Identifiable Information about the individual in accordance with Nigerian Privacy Principle 12 and to correct Personally Identifiable Information about the individual in accordance with Nigerian Privacy Principle 13 by email to info@agroextech.com.

11. ENFORCEMENT AUTHORITIES

The Service may be regulated by or subject to the investigatory and enforcement powers of the Nigeria Federal Trade Commission.

12. NOTICES

Changes To This Privacy Policy. This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our online information practices. When changes are made to this Policy it will be posted to the website and the “last updated” date at the top of this policy will be revised. We also encourage users to periodically check this Policy to understand how Agroxchange Crop Monitoring protects and uses Client Data.

Children’s Privacy. Agroxchange Crop Monitoring’s products and services including web-based, online or access from a mobile platform are not directed to individuals under the age of eighteen (18), and we request that these individuals not provide us with any of their information or use our products and services.

Modifications Based on Local Law. To the extent the laws of a country from which Personally Identifiable Information is collected or in which Agroxchange Technology Ltd is operating may prohibit Agroxchange Technology Ltd from using and sharing Personally Identifiable Information in a way described in this Privacy Policy, the Privacy Policy shall be deemed modified to be consistent with such local laws.

13. OPT-OUT MARKETING CHOICE

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out by following the unsubscribe instructions in any such message or by contacting us by email at info@agroextech.com. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

QUESTIONS OR ADDITIONAL INFORMATION:

If you have questions or concerns regarding your privacy, please send an e-mail to info@agroextech.com. To protect your privacy and security, we will take reasonable steps to verify your identity before granting access to information or making corrections.

