

## Data & Privacy Policy

### Purpose

People in Paddocks Pty Ltd, and its subsidiaries (collectively, "People in Paddocks", "we" or "us") is committed to protecting your privacy and ensuring you have a positive experience on our websites and when you use our products and services (collectively, "Products").

This Policy outlines how People in Paddocks will collect, use, disclose, and administer personal information and data in accordance with the *Commonwealth Privacy Act 1988* (Privacy Act) and associated Australian Privacy Principles (APPs).

### 1. Scope

This policy applies to all data collected by People in Paddocks in the course of providing services to you through our products. The data covered includes personal HR information, metrics about worker behaviour, and safety compliance data including worker locations when clocked on for working alone and emergency responses. It also covers any additional farm-related data collected for the purposes of industry benchmarking and promotions.

### 2. Data Collection

| Type of Data                  | Description   | Purpose of Collection   |
|-------------------------------|---|---|
| Personal HR Information       | Personal data related to farm workers, including contact details and employment records.                | For workforce management, compliance, and reporting purposes.   |
| Worker Behaviour Metrics      | Data on worker performance, safety compliance, and job-related behaviour.                               | To improve safety, optimise farm operations, and provide insights for promotions.                                 |
| Worker Locations              | GPS location data of workers whilst clocked on.   | For workforce safety in paddocks, working alone in remote locations, emergency situations and accident responses. |
| Farm & Safety Compliance Data | Data generated by farms and workers, such as production data, environmental data, and transaction data. | To assist in operational decisions, safety measures and responses and industry benchmarking.                      |

### 3. Data Use

| Purpose                  | How Data is Used   | With Whom Data is Shared   |
|--------------------------|--|--|
| Operational Improvements | Data is used to monitor worker safety, optimise operations, and ensure compliance. | Shared internally with relevant team members for analysis and improvement.   |
| Industry Benchmarking    | Aggregated and anonymised data is used for benchmarking across the industry.       | Shared with industry bodies and relevant partners for benchmarking purposes. |

### 4. Data Control & Portability

People in Paddocks empowers you with control over your data. You have the right to:

- **Access:** Request access to the data collected about your farm.
- **Correction:** Request corrections to inaccurate data.
- **Deletion:** Request deletion of your data when it is no longer needed.
- **Portability:** Retrieve your farm data in both processed and unprocessed forms for use in other systems or with third-party providers.

## Access to Data

You can access your data through the People in Paddocks platform by submitting a formal request via the app or to [support@peopleinpaddocks.com.au](mailto:support@peopleinpaddocks.com.au).

## 5. Data Security

People in Paddocks employ stringent security measures to protect all data from unauthorised access, damage, or destruction.

| Security Measure     | Description  |
|----------------------|--|
| Data Encryption      | All data is encrypted both in transit and at rest to ensure confidentiality.   |
| Access Control       | Access to data is restricted to authorised personnel only, with role-based permissions.  |
| Data Breach Protocol | In the event of a data breach, People in Paddocks will notify affected farmers within 48 hours and provide guidance on steps to mitigate the impact. |

We regularly review our security protocols to ensure they meet or exceed industry standards.

## 6. Data Sharing and Third-Party Agreements

Any third-party data sharing is governed by strict agreements that comply with National standards. You will always be informed and asked for consent before your data is shared with third parties, with the following exceptions:

- **Legal Compliance:** Where required by law, People in Paddocks will share data with government authorities.
- **Aggregated Data:** Anonymised and aggregated data may be shared for research, benchmarking, or other industry purposes.

| Third-Party Entity    | Purpose of Data Sharing                                 |
|-----------------------|---|
| Industry Bodies       | For benchmarking and development of industry standards. |
| Research Institutions | For agricultural research and advancements.             |

## 7. Compliance with National and International Laws

People in Paddocks complies with all relevant laws, including:

- **Privacy Act 1988 (Cth)**
- **General Data Protection Regulation (GDPR)** where applicable for international farmers.

## Legal Disclosures

If People in Paddocks is required to disclose data due to legal obligations, we will notify affected farmers in a timely manner and provide details of the data shared.

## 8. Ongoing Policy Review and Certification

People in Paddocks are committed to obtaining and then maintaining compliance with the **NFF Australian Farm Data Code**. We will regularly review this policy to ensure it reflects current best practices, industry standards, and changes in the law.

We are pursuing formal **NFF certification** to provide an additional layer of trust for our customers.

## 9. Contact Information

For questions, concerns, or to exercise your rights under this policy, please contact People in Paddocks at:

**Email:** [support@peopleinpaddocks.com.au](mailto:support@peopleinpaddocks.com.au)

**Phone:** 0413 881 931

## 10. Record Keeping and Audits

People in Paddocks maintain detailed records of all data collection, sharing, and processing activities. These records are maintained in compliance with the requirements of relevant legislation, ensuring transparency and accountability at all times.

| Record Type                     | Details Maintained  | Retention Period                      |
|---------------------------------|---|---------------------------------------|
| Data Collection Records         | Information on what data was collected, from whom, and the consent obtained.      | 7 years                               |
| Data Sharing Agreements         | Copies of all agreements for third-party data sharing, including consent records. | 7 years or longer if required by law. |
| Access Requests and Corrections | Records of any farmer requests to access, correct, or delete data.                | Indefinitely                          |
| Data Breach Records             | Detailed logs of any data breaches, the response taken, and notifications made.   | Indefinitely                          |

Regular internal audits are conducted to ensure that all data management practices adhere to this policy.

## 11. Policy Review and Updates

This Data Policy is subject to continuous review to reflect changes in technology, industry standards, and legal requirements. We will notify all stakeholders of any significant updates to this policy, and you will always have the opportunity to review and consent to any changes that materially affect your data rights. Four (4) weeks notice will be given to all clients for material changes to these terms and conditions, and our data and privacy policies. Minor changes will be made on a needs basis and will not change the intent or key clauses of our terms and conditions or policies.

| Review Frequency             | Responsible Party        | Notification Method      |
|------------------------------|--------------------------|--------------------------|
| Annual                       | Chief Technology Officer | Email and In-App Alert   |
| Major Legal Changes          | Chief Technology Officer | Email and In-App Alert   |
| Feedback from you or Workers | Chief Technology Officer | Email and Website Notice |

## 12. Transparency Reports

To further build trust with you and other stakeholders, People in Paddocks will issue **annual transparency reports** detailing:

- The categories of data collected.
- How the data was used.
- Any third-party data sharing that took place.
- Information on any data breaches and responses.

These reports will be publicly available on the People in Paddocks website and distributed directly to users.

| Report Type                        | Frequency | Available At  |
|------------------------------------|-----------|---|
| Transparency Report                | Annually  | People in Paddocks Website                            |
| Data Breach Report (if applicable) | As needed | People in Paddocks Website & User Email Notifications |

## 13. Farmer Feedback Mechanism

People in Paddocks are committed to engaging with you and workers to continually improve our data practices. A dedicated **feedback portal** is available on both the web and mobile platforms, allowing users to:

- Submit suggestions for policy improvements.

- Report concerns or potential breaches of this policy.
- Request clarification on specific data practices.

| Feedback Mechanism      | Available On                    | Review Frequency |
|-------------------------|---------------------------------|------------------|
| Web Portal              | People in Paddocks Website      | Quarterly        |
| In-App Feedback Feature | Mobile App                      | Quarterly        |
| Email Submissions       | support@peopleinpaddocks.com.au | Quarterly        |

All feedback is reviewed by the Chief Technology Officer and the results are communicated back to users where applicable.

#### 14. Data Deletion and Retention Policies

People in Paddocks implements clear policies on the **retention and deletion** of farm data, ensuring that data is only kept for as long as necessary to fulfil the purpose for which it was collected.

| Data Type                     | Retention Period  | Deletion Method           |
|-------------------------------|---|---------------------------|
| Personal HR Information       | Retained for 7 years following submission of the data, unless deleted by the farmer.  | Secure digital erasure    |
| Worker Behavior Metrics       | Identified data retained for 5 years after collection, unless de-identification requested by the employee. Data stored and used in an anonymised form by People in Paddocks indefinitely.             | Deletion from all systems |
| Worker Locations              | Identified data retained for the duration of the service provided, unless de-identification requested by the employee. Data stored and used in an anonymised form by People in Paddocks indefinitely. | Deletion from all systems |
| Farm & Safety Compliance Data | Identified data retained for the duration of the service provided, unless de-identification requested by the employee. Data stored and used in an anonymised form by People in Paddocks indefinitely. | Deletion from all systems |

You can request deletion of your data at any time through your account settings or by contacting People in Paddocks support.

#### 15. Breach Notification Process

In the event of a **data breach**, People in Paddocks will take the following steps:

1. **Immediate Response:** The breach will be investigated within 24 hours by the Chief Technology Officer.
2. **Farmer Notification:** If affected farmers will be notified within 48 hours of identifying the breach.
3. **Mitigation:** Steps will be taken to contain and resolve the breach, with guidance provided to affected parties on how to protect your information.
4. **Reporting:** The incident will be documented and reported as part of People in Paddocks's annual transparency report.

| Step                     | Timeline   | Responsible Party        |
|--------------------------|--|--------------------------|
| Investigation            | Within 24 hours of identifying the breach.               | Chief Technology Officer |
| Notification to you      | Within 48 hours of identifying the breach.               | Chief Technology Officer |
| Containment & Mitigation | Ongoing during the investigation.                        | Chief Technology Officer |
| Reporting                | Documented and included in the next Transparency Report. | Chief Technology Officer |

## 16. Data Portability Process

People in Paddocks enables you to request and retrieve your data in both **processed and unprocessed** forms. This ensures that you have the ability to switch providers, use third-party systems, or retain your data for personal records without any undue burden.

### How to Request Data Portability

You can initiate a data portability request through your account settings on the People in Paddocks platform. The request will be processed within 10 business days, during which time the data will be compiled and made available for download in a standardised, machine-readable format (e.g., CSV, JSON, or XML).

| Step                  | Timeline  | Responsible Party        |
|-----------------------|---|--------------------------|
| Submission of Request | Farmers submit the request via the People in Paddocks platform.             | Farmer/User              |
| Data Compilation      | Data is compiled into a machine-readable format.                            | Chief Technology Officer |
| Data Delivery         | Data is made available for download or transferred to a third-party system. | Chief Technology Officer |

You may retrieve both **raw farm data** (e.g., sensor data) and **processed data** (e.g., metrics and benchmarks) as part of this process.

## 17. Data Sharing with Third Parties

When sharing data to third-party service providers, People in Paddocks follows strict data-sharing agreements that comply with national laws. These agreements ensure that third parties adhere to the same standards of transparency, security, and fairness.

### Conditions for Third-Party Sharing

You will have full control of any payroll data being shared with third party accounting software providers and worker location details with Google Maps. People in Paddocks will only make available third party providers that comply with The Privacy Act 1988 (Privacy Act).

People in Paddocks will never share any un-anonymised data with third parties, except when sharing is legally mandated.

| Third-Party Type              | Reason for Data Sharing  | Notification to Farmers   |
|-------------------------------|--|---------------------------|
| Accounting Software Providers | For processing payroll and exporting employee timesheets and pay information | Farmer/User actioned only |
| Industry Partners             | For benchmarking, research, and operational improvements.                    | No                        |
| Legal Authorities             | For compliance with legal obligations.                                       | Yes                       |
| Data Analytics Providers      | For advanced analytics and insights (de-identified data).                    | No                        |

All third-party shares are logged, and records of these transfers are included in People in Paddocks's annual transparency report.

## 18. Data Breach Response Example (for Clarity)

If a data breach were to occur, the following steps would serve as a real-world example of People in Paddocks's response:

1. **Breach Detected:** A vulnerability in the app's data storage system is identified at 10 AM on March 1st.
2. **Investigation Begins:** The Data Protection Officer and IT Security team initiate an immediate investigation at 11 AM.
3. **Containment:** The affected storage system is isolated by 12 PM, preventing further unauthorised access.
4. **Notification:** All affected farmers are notified of the breach by 12 PM the following day (within 48 hours), with details of the breach and steps they can take to protect themselves.

5. **Resolution:** The vulnerability is patched, and additional security measures are implemented by March 3rd.
6. **Follow-up:** Affected farmers receive a detailed report of the breach and the mitigation steps taken.

This structured approach ensures that all data breaches are handled with urgency, transparency, and efficiency.

## 19. Training and Awareness

People in Paddocks is committed to ensuring that all employees, particularly those involved in data handling, are trained on data security and privacy best practices. Our training program includes:

| Training Type                    | Audience  | Frequency                          |
|----------------------------------|---|------------------------------------|
| General Data Protection Training | All employees, with a focus on data handlers.     | Annually                           |
| Security Incident Response       | Chief Technology Officer & IT team                | Biannually                         |
| NFF Australian Farm Data Code    | All employees to ensure compliance with the Code. | Upon hire and annually thereafter. |

This training helps People in Paddocks maintain high standards of data protection and ensures that every team member understands your role in protecting farm and worker data.

## 20. Policy Dissemination and Farmer Education

People in Paddocks believe that transparency and education are key to building trust with you. We offer:

- **Educational Materials:** Accessible online guides and FAQs that explain the data policy in clear, farmer-friendly language.
- **Workshops and Webinars:** Regular online sessions to help you understand how your data is being used and the benefits they receive from it.
- **Customer Support:** A dedicated support team is available to answer questions about the data policy and assist with data requests.

| Dissemination Channel | Content Provided  | Frequency        |
|-----------------------|---|------------------|
| Website               | Full data policy, FAQs, and guidance materials.         | Always available |
| Webinars              | Interactive sessions on data rights and policy updates. | Quarterly        |
| In-App Notifications  | Policy updates and reminders on consent processes.      | As needed        |

You are encouraged to participate in these educational efforts to better understand how People in Paddocks's data practices benefit them while protecting your privacy.

## 21. Policy Effectiveness Review

To ensure the effectiveness of this policy, People in Paddocks conducts regular **reviews and assessments** of its data management practices. This includes:

- **Annual Policy Review:** The policy is evaluated for effectiveness, with updates made to reflect changes in technology, law, and any other partner guidelines.
- **Farmer Satisfaction Surveys:** Surveys are distributed annually to gauge farmer satisfaction with People in Paddocks's data practices and transparency.
- **Third-Party Audits:** External audits are conducted to verify compliance with applicable laws.

| Review Type                 | Frequency     | Responsible Party        |
|-----------------------------|---------------|--------------------------|
| Annual Policy Review        | Annually      | Chief Technology Officer |
| Farmer Satisfaction Surveys | Annually      | Customer Support Team    |
| External Audit              | Every 2 years | Independent Auditor      |

Results from these reviews will be shared with you via transparency reports and policy updates.

## Contact Us

If you have any privacy-related questions or comments related to this privacy policy, please send an email to [support@peopleinpaddocks.com.au](mailto:support@peopleinpaddocks.com.au).