

14 November 2018

PRIVACY POLICY

We warmly welcome You as a user of GrainSense products and services.

GrainSense has developed and/or licensed the GrainSense measurement technology and related services, and manufactures and/or sells a product which enables customers to measure and analyse the protein and other compounds of a grain with a hand held measurement device (the "Measurement Device") and through a cloud based software solution and other services provided by GrainSense (the "Services").

1.1

Data file and Data Controller

GrainSense Oy, a company existing under the laws of Finland, having its address at (Teknologiantie 7 B, 90590 OULU) ("GrainSense"), as data controller, is committed to protect your privacy. This policy informs you of our privacy practices and the way your personal information is collected in connection with providing the Services.

GrainSense respects the privacy and interests of each customer and will process your information in accordance with data protection laws.

1.2

Types of information we process

GrainSense collects personal data both directly from You (e.g. through the user profile page) and from the use of the Measurement Device (e.g. location of the measurement). The information we process may include:

- Your contact information (e.g. your name, telephone number, email address and other information that You send us);
- location of the measurement;
- the Measurement Device unique ID; and
- other data that You may upload to the Services (e.g. notes, videos, images)

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1.3

How we process and protect Your Information

GrainSense processes personal data lawfully and carefully, and always in compliance with good processing practice. We process Your information only to the extent and as long as is necessary to meet the purposes set out in Section 1.5 below. GrainSense retains the collected data for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

GrainSense has implemented a number of technical and organizational measures necessary to protect your personal data against unauthorized access, unlawful processing, accidental loss or damage, and unauthorized destruction.

We limit access to our internal systems that hold personal data to a selected group of authorized users who are given access to such systems through the use of a unique identifier and password. Access to personal data is limited and provided only to individuals for the purpose of performing their job duties.

1.4

Where we transfer personal data

GrainSense uses third parties to collect and process personal data on GrainSense's behalf and in accordance with GrainSense's instructions. We require that such third parties keep the transferred personal data confidential and adequately secure. The updated list of such third parties is available on www.grainsense.com.

GrainSense may store and/or transfer Your personal data to its affiliates and partners in and outside of EU/EEA member states and the United States in accordance with mandatory legislation and this Privacy Policy.

1.5

The purposes of the processing of your personal data

Grainsense processes Your personal data due to the customer relationship between You and us (i.e. legitimate interest). We need the data in order to provide the Services requested by you. Further, GrainSense collects, uses and stores Your personal data in order to:

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- maintain and develop the customer relationship between you and GrainSense;
- provide and develop GrainSense's Services, business and products in accordance with this Privacy Policy; and
- perform its own analytics and enable analytics provided by third parties. We use analytical information solely for supporting analysis of the measurements, product development, and improving products and services. We will not use the information for personalizing content or providing advertising.

To the extent where it is not necessary for us to identify a certain user we anonymize the data. Grainsense may provide such anonymized data to third parties.

The location and measurement information may be used for statistical purposes. However, GrainSense ensures that no original specific GPS coordinates are made available to third parties, unless You expressly consent and/or request disclosure of more accurate location.

1.6 Your rights

You may access and amend your contact details and other profile information any time through the Grainsense application and/or website.

As our customer, You may access the personal data we have collected on You and request that we erase or rectify any erroneous, unnecessary, incomplete or obsolete personal data. In addition, You have the right to withdraw your consent to the collection of location data and/or electronic direct marketing.

You also have the right to request that we transfer Your personal data to third parties, such as other companies. Such data may be obtained directly through the application.

You may access or request that we amend or erase Your personal data, and express any other concern You have about our use of Your data also by contacting us via the email address or phone number given below.

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1.7

Location data

The collection and processing of location data is based on Your consent. You may consent to the collection of location data when You install the application and/or the Services. You have the right to withdraw Your consent through the application, Services and/or website at any time. You can also block the collection of Your location using iOS or Android OS settings.

GrainSense collects data on the location of Your measurements through the application with Your consent. Collection of location data is necessary for us to provide You with the location of the measurement as well as to provide statistics on the measurements. Location data is used for customer support, but also location and farmer based analyses.

The location of the mobile phone is collected only at the moment of the measurement, and even such measurement specific locating shall take place only after you have consented to the processing of location data. We will not share Your GPS geo-location with any third parties without Your consent. To the extent GrainSense makes available GPS geo-location to third parties in accordance with this Privacy Policy, it will be provided anonymously.

The location data is used to allow You to see and save the location of the measurements. Additionally, GrainSense may use the location data to provide information on protein quality to all users in the same are as You, and possibly to other customers of GrainSense. Such information is provided to other customer only on a large, aggregated level. Therefore, it is not possible to identify individual customers from it.

You may use the Services without giving consent to the processing of location data. However, we recommend that You enable the collection of location data, as without it, it is not possible for us to provide You with a map of results of your measurements or maintain and develop all the features of the Services.

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CONTACT DETAILS

If You have any questions regarding the Services or the processing of Your personal data or these Terms of Use, please contact support@grainsense.com.

If You have any complaints regarding the processing of Your personal data by GrainSense, please do not hesitate to contact us. Although we

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strive to solve any disagreements arising from the processing of Your personal data through negotiations, we would like to note that you always have the right to lodge a complaint with a supervisory authority.