

PRIVACY POLICY

Effective as of Feb 26, 2021

This Privacy Policy ("Privacy Policy") explains how OneSoil AG ("Company" or "we" or "us") collects, stores, uses, and discloses personal information from our users ("you") in connection with the OneSoil applications, website and related services (collectively, the "App").

1. ACCEPTANCE OF PRIVACY POLICY. CHANGES TO PRIVACY POLICY

This Privacy policy is an integral part of [Terms of use](#). By accepting [Terms of use](#), you also accept this Privacy Policy.

We reserve the right to and may periodically change, amend, or update this Privacy Policy. We will notify you by email, through the App, or by presenting you with a new version of Privacy policy for you to accept if we make modifications that materially change your rights. Your continued use of the App after the effective date of an updated version of this Privacy Policy will indicate your acceptance of the Privacy Policy as modified.

Individuals located in certain countries, including the European Economic Area (starting from May 25, 2018), shall provide an informed, specific, and unambiguous consent for collection, processing (including based on automated decision-making), use, and transfer of their data in order to use the App. We specifically adapt the functionality of the App for you to be able to provide your consent in full compliance under applicable law (for example, by clicking on "**I agree**" button). This consent may be withdrawn anytime, if you deleting personal data in your profile or, if deletion is impossible, by exercising your rights stipulated in Section 6.

Please, be advised that in case you do not provide your consent for collection, processing, use, and transfer of your personal data (or part of your personal data) in accordance with this Privacy Policy or withdraw your consent, the App availability and functionality may be partially or fully limited. This is because the core functionality of the App is built upon analysis of the personal data and other information provided by you and the App is built in such a way as to be fully functional only with personal data and information provided by our users.

2. PERSONAL DATA WE COLLECT ABOUT YOU

When you download, install, and use the App, we may collect the following personal data about you for you to be able to enjoy the App:

- Your personal email (including the one you provide on landing page);
- Your personal phone number;
- Your personal name;
- Name of the farm;
- Name of the farm field;
- Comments;
- Photos;
- Types of problems that you have on your farm field;
- Geolocation information (GPS data);
- The number of sprouting per square meter;
- The field's boundaries (if defined as personal data under applicable law);
- Satellite images of fields from open sources (if defined as personal data under applicable law);
- Other information that you insert into the App, granted we notify you about such collection and ask your permission.

We collect information from the moment you download the application from an applicable app store and (or) from the moment you register yourself (create an account) in the App.

3. PERSONAL DATA WE COLLECT AUTOMATICALLY

When you download, install, and use the App, we may also automatically collect the following information:

- Information about your device including type of hardware, operating system and its version, UDI, settings, etc.
- Information that is gathered about your use of the App (frequency of use, experienced problems, etc.) via cookies or similar technologies. We need such information in order to improve App's functionality and technical stability.

If the information covered by Sections 2 and 3 is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, we may use it for any business purpose. To the extent information covered by these Sections is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection laws, it is referred to in this Privacy Policy as "**personal data**." We use pseudonymization for particular types of personal data. Please bear in mind that provisions of Section 6 do not apply to pseudonymized personal data.

4. HOW WE USE YOUR PERSONAL DATA

We use all information collected about you and your use of the App to improve the App and deliver better experience.

We may also need your information in order to delete, forbid or block any Content (as defined in [Terms of use](#)) that violates the present Privacy Policy and Terms of use, or investigate any illegal or suspicious use of our App.

Generally, we use your personal data for the following purposes:

- To contact you in case it is needed.
- To deliver more personalized and adapted experience to you.
- To enhance or improve your user experience in the App.
- To understand how you use the App.
- To share your non-identifying information or anonymized (de-personalized) data with third parties, if needed.
- To share your personal information with integrated Third-party services in order for such integrated Third-party services to provide you additional functionality within the App (for example, additional analytics and insights).
- To send you technical notices, updates, security alerts, promo and marketing materials, and administrative messages.
- To respond to your comments, questions and requests and provide customer service.
- To perform all other actions reasonably required for the maintenance and operation of the App.

5. HOW WE SHARE YOUR PERSONAL DATA

All your personal data uploaded from your mobile phone or logged in by you is collected on our servers for the purposes indicated in Section 4 of this Privacy Policy. We do not share your information with any third parties except as specified in this Privacy Policy and (or) when you provide your consent.

Third-party services. We may share some device identifiers and non-identifiable information with the following third-party services:

1. **Amplitude.** Amplitude is a behavioral analytics product that is enabling us to see and analyze how you navigate through the App, what features you prefer the most, and how to improve your experience with the App. See more here about Amplitude approach to privacy [here](#).
2. **Firebase.** Firebase is an analytics product from Google, Inc. that allows us to track crashes of the App, monitor events in the App, provide us stats regarding the use of the App. Firebase may

collect certain device identifiers in order to understand on what devices and under which circumstances particular incidents and events happen. See more on Firebase [here](#).

3. **Facebook Analytics, Google Analytics and Yandex Metrika.** We use Facebook Analytics, Google Analytics and Yandex Metrika tools to track installs of our App and other stats. Normally, Facebook, Google and Yandex collect only non-personally identifiable information, though some personal data like device identifiers may be transferred to Facebook, Google and Yandex. Read more about analytical services provided by Facebook [here](#), by Google [here](#) and by Yandex [here](#). You can find their data practices in 'Privacy' sections.

The above mentioned third-party services are either EU-based or (and) compliant with the GDPR (for example, EU-US Privacy Shield Framework that ensures that European data protection requirement are met). The privacy policy of these services can be found on their respective websites.

BY USING THE APP, YOU CONSENT THAT WE MAY USE COOKIES AND THIRD-PARTY SERVICES, AND COLLECT YOUR USAGE DATA UNDER A UNIQUE IDENTIFIER, FOR THE PURPOSES OF TRACKING, ANALYSIS, AND IMPROVEMENT OF THE APP.

Integrated Third-Party services. Certain integrated Third-party services may access your personal data in the same manner as the Company does, for example, information about the name of your farm field, notes that you leave on the field, field boundaries, etc. Any such Third-party services shall treat your information in the same manner as the Company does and the Company reasonably ensures that such integrated Third-party services are compliant with applicable data protection laws and regulations. Integration of these Third-party services into the App gives you additional functions like analytics, complementary components, etc. that enrich your App experience and maximize your benefit. We will periodically update our website with information about what integrated Third-party services we currently have in place and how to utilize such services in the App. In any event you have to explicitly opt-in for the use of such integrated Third-party services (for example, by using a unique link provided by such service and (or) registering in the App via such link).

You own choses. You may choose to share your Content using any third-party services available through the App (for example, email providers). Please note that any such third-party services are not governed by this Privacy Policy. For instance, you may choose to send an email to share your photo using your Google account, then all applicable Google privacy policy will apply. When you access and use Third-party services via the App, we are not responsible for these Third-party services and we do not endorse or make any warranties and representations about such Third-party services.

Aggregated Information. We may also share aggregated, anonymized or de-identified information, which cannot reasonably be used to identify you. For example, we may share, including, without limitation, in articles, blog posts and scientific publications, general age demographic information and aggregate statistics about certain activities or symptoms from data collected to help identify patterns across users.

6. PRINCIPLES OF PROCESSING. USER RIGHTS

We store your information as long as it is reasonably necessary for the goals contemplated in Section 4 of this Privacy Policy.

We fully adhere to data minimization, transparency, purpose limitation, accountability principles, data retention security in the operation of our App. We retain your personal data for so long as it is required under applicable law or for you to be able to utilize the App.

Modification, correction and erasure. You are able to modify, correct, erase, and update your personal data by writing us at hello@onesoil.ai or in the in-app chat.

Access. You have a right to access your personal data you insert into the App and ask us about what kind of personal data we have about you. You can do this by using the app settings or by writing us at hello@onesoil.ai in the in-app chat.

EU residents. Individuals residing in the countries of the European Union have certain statutory rights in relation to their personal data introduced by the General Data Protection Regulation (the “GDPR”). Subject to any exemptions provided by law, you may have the right to request access to personal data (including in a structured and portable form), as well as to seek to update, delete or correct personal data:

- a) **Rectification of Personal Data and Restriction of Processing.** You are responsible for ensuring the accuracy of your personal data that you submit to OneSoil. Inaccurate information will affect your experience when using the OneSoil Web Sites and tools and our ability to contact you as described in this Privacy Policy. If you believe that your personal data is inaccurate, you have right to contact us and ask us to correct such personal data by contacting us at hello@onesoil.ai. You shall also have the right to request restriction of processing of your personal data, if you contest the accuracy of the personal data and we need some time to verify its accuracy.
- b) **Access to your personal data and data portability.** The App gives you the ability to access and update personal data within the App and your account settings. You shall have the right to request information about whether we have any personal data about you, to access your personal data (including in a structured and portable form) by simply writing us at hello@onesoil.ai.
- c) **Erase of your personal data.** If you believe that your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or in cases where you have withdrawn your consent or object to the processing of your personal data, or in cases where the processing of your personal data does not otherwise comply with the GDPR, you have right to contact us and ask us to erase such personal data as described above. You can simply write us at hello@onesoil.ai. Please be aware that erasing some personal data inserted by you may affect your possibility to utilize the App and its features. Erasure of some personal data may also take some time due to technical reasons.
- d) **Right to object processing of your personal data.** You can object processing your personal data and stop us from processing your personal data, simply write us at hello@onesoil.ai. Please be aware that erasing some personal data inserted by you may affect your possibility to use the App and its features.
- e) **Notification requirements.** We commit to notify you within reasonable period of time and your data protection authority within the timeframe specified in applicable law (72 hours) about any personal data breaches in the App.
- f) **Data Protection Authorities.** Subject to GDPR, you also have the right to (i) restrict our use of Personal Data and (ii) lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with GDPR.

Please keep in mind that in case of a vague access, erasure, objection request or any other request in exercise of the mentioned rights we may engage the individual in a dialogue so as to better understand the motivation for the request and to locate responsive information. In case this is impossible, we reserve the right to refuse granting your request.

Following the provisions of GDPR we might also require you to prove your identity in order for you to invoke the mentioned rights. This is made to ensure that no rights of third parties are violated by your request, and the rights described in this section are exercised by an actual Personal Data subject or an authorized person.

Please note that we will grant your request within 30 days after receiving it, but it may take us up to 90 days in some cases, for example for full erasure of your Personal Data stored in our backup systems - this is due to the size and complexity of the systems we use to store data.

7. SECURITY OF PERSONAL DATA

We take all reasonable and appropriate measures to protect all collected personal data from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the nature of the personal data. Among others, we utilize the following information security measures to protect your personal data:

- a) Pseudonymization and tokenization of certain categories of your personal data;
- b) Encryption of your personal data in transit and in rest;
- c) Systematic vulnerability scanning and penetration testing;
- d) Protection of data integrity;
- e) Organizational and legal measures. For example, our employees have different levels of access to your Personal Data and only those in charge of data management get access to your Personal Data and only for limited purposes required for the operation of the App. We impose strict liability on our employees for any disclosures, unauthorized accesses, alterations, destructions, misuses of your Personal Data.
- f) Conducting periodical data protection impact assessments in order to ensure that the App fully adheres to the principles of 'privacy by design', 'privacy by default' and others. We also commit to undertake privacy audit in case of Company's merger or takeover.

Please understand that you can help keep your information secure by choosing and protecting your password appropriately, not sharing your password and preventing others from using your mobile device. Please understand that no security system is perfect and, as such, we cannot guarantee the absolute security of the App, or that your information won't be intercepted while being transmitted to us. If we learn of a security systems breach, we may either post a notice, or attempt to notify you by email and will take reasonable steps to remedy the breach as specified in this Privacy Policy.

We process information in a way that is compatible with and relevant for the purpose for which it was collected. To the extent necessary for those purposes, we take reasonable and appropriate steps to ensure that any information in our care is accurate, complete, current and reliable for its intended use.

8. STORAGE AND INTERNATIONAL DATA TRANSFERS.

For now, our servers are based in the United States of America, and regardless of your location, the information covered by this Privacy Policy may be transferred (through SSL connection) and stored on servers located in the United States of America, namely on the Microsoft Azure cloud. Microsoft self-certified under EU-US Privacy Shield framework and, thereby, provides an adequate level of protection of your Personal Data. See more about Microsoft Azure data protection compliance [here](#).

9. CHILDREN'S PRIVACY

We are committed to protecting the privacy of children under COPPA or any other applicable law (in particular, General Data Protection Regulation). The App is not intended or designed to attract children under the age of 16. We do not collect personal data from any person we have actual knowledge is under the age of 16. You are not allowed to use the App if you are under the age of 16.

11. CONTACT US

If you have any questions regarding this Privacy Policy, please, contact us at:

OneSoil AG
c/o Walder Wyss AG, Seefeldstrasse 123, 8008 Zürich, Switzerland

Email: hello@onesoil.ai