



Regen Digital Pty Ltd

Privacy Policy

Your privacy is important

This statement outlines Regen Digital's policy on how we use and manage personal information provided to us or collected by us.

Regen Digital Pty Ltd (Regen Digital) is bound by and compliant with the Australian Privacy Principles contained in the Commonwealth Privacy Act, and with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Regen Digital may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Regen Digital's operations and practices and to make sure it remains appropriate to the changing legal environment.

This privacy policy assumes that you are resident in Australia. If you are resident in the UK or Europe, please contact us for more information regarding how we treat your personal information.

What kind of personal information does Regen Digital collect and how does Regen Digital collect it?

The type of information Regen Digital collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Your name, address, phone number and email address
- Your willingness to join mailing and/or supporter list
- Your preferences with respect to information on environmental markets and other information that may be of interest

Personal Information you provide:

Regen Digital will generally collect personal information held about an individual by way of online forms on its web platform. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information collected by other people:

Regen Digital is not responsible for, and has no control over, the collection of personal information by third parties who may also use the Regen Digital platform.

In some circumstances Regen Digital may be provided with personal information about an individual from a third party. In such circumstances, we will treat such personal information as if it were collected by us and the terms of this Privacy Policy will apply.

How will Regen Digital use the personal information you provide?

Regen Digital will use personal information it collects from you for the primary purpose of providing advisory & digital platform services, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, Regen Digital will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

In relation to employee records:

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to Regen Digital's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Regen Digital and employee. However, Regen Digital must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, Regen Digital's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which Regen Digital uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;

- for assessing the suitability of applicants
- to manage obligations to staff such as payment of salaries
- to satisfy Regen Digital's legal obligations,

Where Regen Digital receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

Regen Digital also obtains personal information about volunteers who assist Regen Digital in its functions or conduct associated activities, such as to enable community associations to manage the local business activities of Regen Digital.

Marketing and fundraising:

Regen Digital treats marketing and seeking funding for the future growth and development of Regen Digital as important. Personal information held by Regen Digital may be disclosed to organisations that assist in Regen Digital's fundraising or marketing. In such circumstances these organisations and their employees must agree to abide by the terms of Regen Digital's Privacy Policy.

Who might Regen Digital disclose personal information to?

Regen Digital may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- people providing services to Regen Digital, and,
- anyone you authorise Regen Digital to disclose information to.

Sending information overseas:

Regen Digital will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The Regen Digital platform is hosted on AWS servers in Australia by our service partner Barnowl.io LLC (trading as Farmier) that is a company based in the US. We also use a tool for creating a farm digital twin called SurveyStack that is developed and maintained by OurSci LLC that is also based in the US, meaning that data collected by this tool will be stored on their servers in the US. Both Barnowl.io LLC and OurSci LLC have Privacy Policies that are consistent with this Privacy Policy. We also use Wordpress and Hubspot to manage communication that is not directly related to a farm digital twin.

How does Regen Digital treat sensitive information?

In referring to 'sensitive information', Regen Digital means:

“information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual”.

In the unlikely event that sensitive information is collected, it will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

Regen Digital’s staff are required to respect the confidentiality of personal information and the privacy of individuals.

Regen Digital has in place steps to protect the personal information that it holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

We have a data breach response plan, which we would follow in the unlikely event of a privacy or data breach.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

Updating personal information

Regen Digital endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by Regen Digital by contacting the Privacy Officer of Regen Digital at any time.

The Australian Privacy Principles and the Health Privacy Principles require Regen Digital not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information Regen Digital holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which Regen Digital holds about them and to advise

Regen Digital of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information Regen Digital holds about you, please contact the Privacy Officer in writing.

Regen Digital may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, Regen Digital may charge a fee to retrieve and copy any material if the information sought is extensive. Regen Digital will advise the likely cost in advance.

How long will Regen Digital keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way Regen Digital manages the personal information it holds, please contact us at support@regenfarmersmutual.com. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: enquiries@oaic.gov.au
- tel: 1300 363 992