



# Privacy Policy



## Control

You own your personal info and can ask us to delete or remove your info.



## Changes

When we update our privacy policy, we let you know



## Law enforcement

We do not give your info to governments or law enforcement unless they follow appropriate legal processes.



## We never sell your data

We do not sell or trade your info. We only disclose your info with others as set out in this policy and our agreement with you.



## Security

We have secure systems & processes in place to securely store info

This Privacy Policy applies to the **Regen Group**, which includes:

- Regen Farmer's Mutual Limited ABN 23 651 686 654
- Regen Digital Pty Ltd ABN 32 653 452 478

## Your privacy is important

This statement outlines our policy on how we use and manage personal information provided to us or collected by members of the Regen Group.

## Farm Data is important

We lead with purpose here at Regen Group and that's why we're also working towards managing data in line with the [Farm Data Code](#) from the [National Farmers Federation](#).

- The Farm Data Code is about making it clear how businesses collect, use, share, and manage farm data.
- We respect farmer data and aim to keep our Regen Group principles and the principles of the Farm Data Code at the front of our data decision making.

## You accept this Policy when you visit our Sites or use our Platform

You accept this Privacy Policy when you:

- access our **Sites** (including our website [regenfarmersmutual.com](https://regenfarmersmutual.com), our online content on third-party applications such as [YouTube](#) as well as social media platforms including [Facebook](#), and [Twitter](#)),
- send us information (such as an email or enquiry form message), or
- buy products & services from us.

Once accepted, the terms in this Privacy Policy apply to your personal information that we hold or collect in future.

For questions or notices, please contact us: [info@regenfarmersmutual.com](mailto:info@regenfarmersmutual.com) | Policy last updated: August 2022

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.

## Collecting & using your information

### 1. What kind of personal information do we collect?

When we collect personal info, we do so in line with this Privacy Policy.

You don't have to give us your personal info, but if you don't, we might not be able to provide you our various services or you might not be able to access certain Site features.

**Examples** *We can't contact you if we don't have your contact details. We can't deliver products to you if we don't know what address you want the product delivered to.*

Depending on how we interact with you, we might collect some or all the following information:

- **Contact:** Name, age, email address, date of birth, address, phone number, drivers' licence, ID card
- **Farm Data:** Including Individual Farm Data and Aggregated Farm Data as defined in the Farm Data Code.
- **Social:** Gender, social media platform details, associated accounts like Google and info you give us through them; images of you; your preferences and opinions;
- **Device:** Device type, IP address, browser type, operating system, location, device, and network information
- **Actions:** How you interact with our Site, browser session & geo-location data, search queries & browsing behaviour & search history, details of enquiries you make about our products or services
- **Financial:** Purchase history, payment method (through our third-party payment processor), products purchased, bank account details
- **Content:** Contents of communications, stored documents & media,
- **Location:** Delivery address, electronic signature geo-tag location, publicly available check in location data on social media

### 2. Use: Why do we collect, hold, use, and disclose your personal info?

Depending on how we interact with you, we might collect and use your personal information for different reasons:

- To deliver our Services, Site, and Platform to you
- To send you information that you request from us
- To communicate with you, to market products and services to you, to tell you important service updates,
- To verify identity or address and delivery information,
- To provide Site functionality,
- To take payment and to give refunds,
- For internal record keeping, invoicing, and billing,
- For analytics, market research and business development, including to operate and improve our Site
- For marketing, to send you promotional info about us and our products and services and information about third parties we think you might be interested in,
- To comply with our legal obligations or to resolve disputes,
- To consider your application to join our team.

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

### Job applicants, staff members and contractors

Our primary purpose for collecting personal information of job applicants, team members and contractors, is to assess and (if successful) to engage the applicant, team member or contractor.

Other purposes include:

- for insurance purposes;
- for assessing the suitability of applicants
- to manage obligations (such as paying our team members and contractors)
- to satisfy The Regen Group's legal obligations,

If we get any unsolicited job applications, we manage those in line with the unsolicited personal information requirements of the Privacy Act.

### Volunteers

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

### Marketing and fundraising

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

## 3. Opting out: Changing your preferences

You can opt out of marketing communications at any time by clicking on the link in our communications to unsubscribe.

### Can you interact with us anonymously?

Yes, if you want to visit our Site or subscribe to our mailing list under a pseudonym, you can. However, we might not be able to work with you as a customer, member, or subscriber unless you identify yourself and give us the information we need.

## 4. How do we collect personal information?

In some instances, we collect information from you directly and sometimes we collect information

### Personal Information you give us directly

The main way we collect personal information from you is from you directly, via a web form on our Site, an application form we send you, or an interface in our Platform.

*For example, your name and email address when you subscribe to our mailing list.*

### Personal Information you give us indirectly

Some personal information is collected indirectly, for example via our website which tracks xxx (see below details about Cookies and Web Beacons).

You can opt out of this collection by changing your browser settings.

*For example, the social account information that you share with us when you follow our social media account or interact with content that we post.*

### Personal Information we collect about you from other people

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

In some circumstances Regen Group 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.

## Sharing information

### 5. Sharing

#### Who do we share your personal information with?

As a general rule, we aim to limit the amount of personal information that we share with third parties.

- We also aim to have relevant agreements in place with appropriate confidentiality obligations.

Depending on how we interact with you, we might share some of your personal information with one or more of the following third parties:

- Our service providers, such as IT service providers, data storage, web-hosting and server providers, delivery partners, design and marketing partners, debt collectors, maintenance or problem-solving providers, marketing providers, advisors and payment systems operators
- anyone you authorise us to share information with
- Our related companies in the Regen Group,
- our team members and contractors,
- our business partners, sponsors, or promoters of competitions we run
- anyone we transfer our business or assets to,
- credit reporting agencies, courts, or authorities if you do not pay for our goods or services
- Authorised law enforcement agencies who follow the legally required processes, or in connection with any actual or prospective legal proceedings, or to establish, exercise or defend our legal rights
- third parties, including agents or sub-contractors, who help us in providing information, products, services, or direct marketing to you. This may include parties located, or that store data, outside of Australia
- third parties to collect and process data, such as Google Analytics or other relevant businesses, including those that store data outside Australia.

### 6. Disclosure outside Australia

Some suppliers we use to provide you services are located outside Australia.

- We may disclose your personal info outside Australia. Overseas third parties might not be governed by the [Privacy Act](#) and might not comply with the [Australian Privacy Principles](#). So if those parties breach the Privacy Principles, you aren't protected by the Privacy Act.
- By giving us your personal info, you consent to us disclosing it outside Australia and acknowledge we aren't required to ensure overseas recipients manage your personal info in line with AU Privacy Law.

## Transfers to offshore locations

Offshore locations may include:

Business operation →	Information may be stored, processed in or transferred	Regen Group offices	Hosting facilities for our Site	Hosting facilities for our Platform	Our employees	Our suppliers and contractors
Location →	Australia, United States	Australia	Australia, United States	Australia, United States	Australia	Australia, United States

## Sending information overseas:

Regen Group 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 Group 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 Group treat sensitive information?

**Sensitive information** 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 Regen Group collects sensitive information, we only use and share that information for the purpose for which it was given or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

# Storing information

## 7. Store

### How do we store & secure this info?

To help prevent unauthorised access or disclosure, we have general physical, electronic & management processes to securely store personal info & protect it from misuse, loss, unauthorised access, modification & disclosure.

- Whilst we take measures to safeguard against unauthorised disclosures, we can’t assure you the personal info we collect won’t be disclosed in a way that is inconsistent with this Privacy Policy.
- We do not guarantee the security of any info transmitted to or by us over the Internet.
- We require our team members and contractors to respect the confidentiality of personal information and the privacy of individuals.
- We have a data breach response plan, which we would follow in the unlikely event of a privacy or data breach.

## Updating personal information

We aim to ensure personal information we hold is accurate, complete and up-to-date. You have the right to check what personal information Regen Group holds about you.

- You can ask us to update your personal information held by Regen Group by contacting the Privacy Officer of Regen Group at any time.
- To make a request to access any information Regen Group holds about you, please contact our Privacy Officer via email: [support@regenfarmersmutual.com](mailto:support@regenfarmersmutual.com).
  - We may ask you to verify your identity and specify what information you require.
  - Although we don't charge a fee for accessing or correcting your personal information, we may charge a reasonable fee to retrieve and copy any material if the information sought is extensive. We'll let you know the costs beforehand.

## How long will Regen Group 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.

## Other details

### 8. 🍪 Cookies: Do we use cookies?

Yes, we may use cookies on our Site from time to time.

**Cookies** are small text files placed in your computer's browser to store your preferences.

- On their own, cookies do not tell us personal info however, they let others like [Google](#) and [Facebook](#), push our adverts to appear on your social media and online media as part of our marketing.
- If you give us personal info, we may link this to the data stored in the cookie.

### 9. 📡 Web beacons: Do we use web beacons?

Yes, we may use web beacons on our Site from time to time.

- **Web beacons** are small pieces of code placed in a web page or email to monitor behaviour of site visitors and email recipients.
- We may also use Google Analytics to collect and process data. For more details on how Google uses data when you use third party websites or apps, please search [Google's site](#).

### 10. Links to other websites

Our Sites have links to other websites & applications that we don't control. We cannot and do not protect personal info you share with those other websites. Check those other websites for details of their privacy policies.

### 11. Changes

We will change this Policy if we change the way we manage your personal info changes or privacy laws change. When we do, we put the updated policy on our Sites and, if possible, we also notify you via email.

## 12. Complaints and questions

Let us know if you have questions or concerns about how we use your personal info or the way we try to explain how we manage your info.

- You are responsible for the accuracy of information you decide to give us.
- If the info we hold about you is incomplete, irrelevant, or otherwise incorrect, please let us know so we can fix it.
- We know we won't always get things perfect, so we appreciate your feedback to improve.

### Enquiries and privacy complaints

- If you would like further information about the way Regen Group manages the personal information it holds, please contact us at [support@regenfarmersmutual.com](mailto: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 on the below details

*For more information on privacy, visit [oaic.gov.au](http://oaic.gov.au) or contact OAIC via [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or via phone: 1300 363 992*