

Privacy Policy

1. SCOPE

Yara International ASA offering the Agoro Carbon Alliance, and their affiliates (collectively Agoro Carbon) take the protection of your personal data seriously. Agoro Carbon wants you to feel safe in using its products.

This Privacy Policy describes Agoro Carbon's privacy practices and your rights as to the personal data that Agoro Carbon collects and uses in connection with:

- 1) the Agoro Carbon application, platform, website and software; and
- 2) the Agoro Carbon services, information, data, advice and recommendations made available through the Agoro Carbon application and platform, (together, the Agoro Carbon Platform). Please make sure also to consult the [Agoro Carbon Alliance Platform Terms], which govern your use of the Agoro Carbon Platform, and any other relevant Yara privacy policies specific to your use of certain Yara services, such as the Yara General Privacy Policy, which governs your use of the Yara.com website.

1.1 AGORO CARBON PLATFORM

This Privacy Policy applies to the processing of personal data via or in the context of the Agoro Carbon Platform, as well as via or in the context of:

- (a) Websites that are owned by Agoro Carbon or Agoro Carbon-branded, and that link to this Privacy Policy, including, but not limited to:
 - www.agorocarbonalliance.com
- (b) Online or downloadable software, or apps such as:

- <https://www.agorocarbon.com>
 - <https://www.agorocarbonalliance.com>
- (c) Email messages that link to this Privacy Policy.
- (d) Its social media pages and applications that Agoro Carbon administers, including, but not limited to:
- <https://www.facebook.com/AgoroCarbonAlliance>
 - <https://www.facebook.com/AgoroCarbonUS>
 - <https://www.instagram.com/agorocarbonalliance/>
 - <https://www.instagram.com/agorocarbonus/>
 - <https://www.linkedin.com/company/agoro-carbon-alliance/>
 - <https://twitter.com/AgoroCarbon>
 - <https://twitter.com/AgoroCarbonUS>
 - https://youtube.com/channel/UCsQIt5Kx_UrdBa_f44xfDHA
 - https://www.youtube.com/channel/UC9ohVDAiP8K5_US6HrHRUZA
- (e) Events (such as trade shows, grower events or other networking events) in connection with Agoro Carbon.

Through the Agoro Carbon Platform, growers may be invited to participate in Agoro Carbon's program for carbon sequestration, greenhouse gas emissions reduction and carbon credit generation (Program).

1.2 YOUR PERSONAL DATA

Personal data is any information that enables Agoro Carbon to identify you as an individual. For example, this can be your name or shipping address, but also your device data or occupation. The categories of personal data that Agoro Carbon collects or obtains include:

- (a) Contact details (for example, name, postal address, e-mail address and telephone number).

- (b) Personal details (for example, demographic characteristics, including birth-date and gender).
- (c) Transaction data (for example, transactions and agreements, shipping and billing information).
- (d) Financial data (for example, bank, card and account details, and other payment related information).
- (e) Farming activity (for example, tasks and agronomic decisions, property rights and responsibilities).
- (f) Device and software data (for example, IP address, device-ID, operating system and corresponding version, specific use data and patterns, and trainings you attend).
- (g) Relationship data (for example, support requests, ratings and feedback).
- (h) Social media account data (for example, social-media account ID and posts).

Such personal data relates to any individual who uses or is involved with the Agoro Carbon Platform. This includes:

- (a) Growers in connection with their participation in the Program (including on boarding and off boarding).
- (b) Advisors, who refer growers to the Program.
- (c) Other individuals whose information is collected by or made available to Yara in connection with the Agoro Carbon Platform and Program, such as prospective growers or field owners.
- (d) Third party service providers who support the Agoro Carbon Platform, or commercial partners, such those with whom Agoro Carbon cooperates for marketing initiatives.
- (e) Employees and representatives of the above categories' persons.

If you provide to us any personal data of another person, you must ensure that you are authorized to do so and that such person is informed about this Privacy Policy. For certain uses of the Agoro Carbon Platform, we may, but are not obliged to, provide you with template privacy release forms to assist you in providing necessary information to such persons, for example from growers where you act as their advisor, from your field owner, your employees or persons you invite to the Agoro Carbon Platform. Where the Agoro Carbon Platform allows you to invite a contact, we encourage you to use this functionality responsibly, and refrain from sending requests to persons who may not reasonably expect to receive and consent to them.

2. HOW AGORO CARBON USE YOUR PERSONAL DATA

2.1 PURPOSES FOR ALL AGORO CARBON PLATFORM

AGORO CARBON USES YOUR PERSONAL DATA FOR:

- (a) Providing the functionality of the Agoro Carbon Platform, Program and customer support
- Provide the Agoro Carbon Platform and Program to you, such as allowing access to your account.
 - Complete and record your transactions.
 - Provide you with, and enable you to generate, agronomic reports and tips.
 - Provide you with customer service and technical assistance (for example, installation, maintenance and assistance).
 - Send you administrative information, such as changes to our terms and policies.
 - Provide training to you regarding the Agoro Carbon Platform and Program.
 - Respond to your inquiries and requests, for example when you send us questions or suggestions.

Agoro Carbon do this pursuant to our contractual relationship with you or to comply with a legal obligation.

- (b) Providing you with marketing materials
- Send you marketing communications and offer other materials that we believe may be of interest to you, such as to send you newsletters and personalized offerings.
 - Share information with other marketers to permit them to send you marketing communications, consistent with your choices.
 - Enable the posting of comments and testimonies about you on our websites and other parts of the Agoro Carbon Platform.

Agoro Carbon do this with your (opt-in/out) consent, or where we have a legitimate interest.

- (c) Providing you with promotional opportunities and facilitate social sharing

- Allow you to participate in promotions.
- Facilitate social sharing functionality if you choose to do so.

Agoro Carbon do this with your consent or because we have a legitimate interest.

(d) Conducting business reporting and offering tailored services

- Analyze your use of the Agoro Carbon Platform in order to prepare aggregated trend reports.
- Provide you with tailored advice and agronomical tips.
- Allow you to participate in polls and surveys, so that we can improve our service offerings.

Agoro Carbon do this with your consent or because we have a legitimate interest.

(e) Accomplishing our business purposes

- Business intelligence, such as compiling general market insights, or machine learning.
- Product improvement, to develop new products, or enhance our current products.
- Governance and audits, for example by implementing internal audits, business analysis, controls and reporting (for example, whistleblowing procedures).
- Business transactions, including a reorganization, merger, sale, joint venture, assignment, transfer, divestures or other disposition (Business Transaction). For example, in case of a merger with or acquisition by another company, we may be required to disclose personal data to that company.
- Protect Agoro Carbon assets, for example for health and safety reasons, or to manage access rights and security (to prevent fraud, cyberattacks and identity theft).
- Comply with legal obligations, for example we need to retain invoices for accounting purposes, or disclose some data to comply with requests from public authorities.

Agoro Carbon do this to manage our contractual relationship with you, comply with a legal obligation, and/or because we have a legitimate interest.

- (f) Aggregating and/or anonymizing personal data

Agoro Carbon may aggregate and/or anonymize personal data so that they will no longer be considered personal data. Agoro Carbon do so to generate other data for our use, which we may use and disclose for any purpose. Agoro Carbon may do so for example after your account has been closed.

3. OTHER INFORMATION

Agoro Carbon also collects and uses certain data which does not reveal your specific identity and does not relate to an identified or identifiable individual (Other Information). This information therefore does not qualify as personal data. Agoro Carbon still wants you to be aware of our practice in relation to such information.

Examples of what may constitute Other Information include:

- (a) Agronomic and business-related data, such as:
- Fertilizer, field, soil and crop data (for example, type, amount, location and mapping, and yield).
 - Other local and farming characteristics (for example, location and mapping, weather and farming conditions).
 - Machinery data (for example, model, technical characteristics, location and associated tasks).
- (b) Software and data (for example, connection time and use trends).
- (c) Information collected through cookies, pixel tags and other technologies.
- (d) Anonymized or aggregated data.

Agoro Carbon may use and disclose Other Information for any purpose, except where Agoro Carbon is required to do otherwise under applicable law. In some instances, Agoro Carbon may combine Other Information with personal data. If Agoro Carbon does, it will treat the combined information as personal data as long as it is combined. Examples of ways in which Agoro Carbon uses Other Information include:

- (a) Generation, issuance, and verification of carbon credits.
- (b) Statistical analysis of certified carbon credits.

- (c) Research and development.
- (d) Product improvement.

4. CONTACTING AGORO CARBON

Yara International ASA is the company responsible for this Privacy Policy. The local Agoro Carbon entity with whom you contract for payment and shipping purposes may also be responsible for certain Agoro Carbon Platforms or regions (as set out in your contract), such as to process your order and invoice, and manage your contractual relationship (including providing you marketing materials). If you have any questions about this Privacy Policy, please contact Agoro Carbon at dataprivacy@agorocarbon.com or Drammensveien 131, 0277 Oslo, Norway, Tel: +47 2415 7000.

5. YOUR RIGHTS

To the extent provided by applicable law, you may be entitled to request:

- (a) Right of access
 - To obtain confirmation from Agoro Carbon as to whether or not Agoro Carbon holds personal data about you, access such data and other information in regard to such data.
 - To obtain a copy of your personal data.
- (b) Right of rectification
 - The modification of personal data if they are incorrect or incomplete.
- (c) Right to deletion
 - The deletion of personal data under certain instances, for example, where you consented to their use and have since withdrawn your consent, or where they are illegally used.
- (d) Right to restriction
 - The limitation of the use of personal data under certain circumstances.
- (e) Right to portability

- The receipt of the personal data which you provided to Agoro Carbon, in a structured, commonly used and machine-readable format.

- Transmitting such personal data, or having them transmitted where technically feasible, to another company responsible for their use, under certain circumstances.

(f) Right to object or opt-out

- To object to the use of your personal data under certain circumstances, including in relation to direct marketing and where your personal data are used based on a legitimate interest of Agoro Carbon. If you would like to opt-out from any direct marketing, you can do so by clicking on the “unsubscribe” button in the messages you receive.

(g) Right to withdraw consent

- To withdraw your consent at any time if the use of your personal data is based on consent. Note that withdrawing your consent will not make the use of your data before your withdrawal unlawful.

If you would like to exercise your rights, do not hesitate to contact Agoro Carbon at dataprivacy@agorocarbon.com. Please note that the rights above may be restricted in line with applicable law. You may also put in a complaint with a data protection authority for your country or region where you have your habitual residence or place of work, or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities for the European Economic Area is available [here](#). The responsible supervisory authority for Agoro Carbon is Datatilsynet, P.O. Box 458 Sentrum NO-0105 Oslo, postkasse@datatilsynet.no.

6. WHO AGORO CARBON SHARES YOUR PERSONAL DATA WITH

6.1. WHICH THIRD PARTIES HAVE ACCESS TO PERSONAL DATA

(a) Group companies of Agoro Carbon, for the purposes set out in this Privacy Policy

- Optimizing Agoro Carbon's shared processes. Within a group of companies, it is sometimes necessary to use and leverage resources effectively. In this context, Agoro Carbon supports each other within our group in optimizing its shared processes.

- Other cross-affiliate initiatives, such as research and development, marketing and finding new prospects, and other purposes as set out in the Data Privacy Directive available [here](#).

(b) Service providers to facilitate services they provide to Agoro Carbon

- These services include hosting data, processing payments, delivering shipments, email delivery, distribution, customer support and technical assistance, web analytics, IT performance monitoring, customer relationship management, evaluating, running and optimizing user experience or our growth campaigns, polls and surveys, legal compliance, as well as to secure our business operations, such as identifying and resolving malfunctions.

(c) Public authorities where disclosure is appropriate

- To address a dispute with a third party.
- When Agoro Carbon responds to law enforcement requests and orders.
- To provide information Agoro Carbon believes is important.

(d) Partners and commercial relationships to accomplish Agoro Carbon's business with them

- In connection with the verification and accreditation of carbon credits and environmental benefits.
- In connection with collaboration initiatives, for example, as part of a marketing initiative.
- In connection with a sale or Business Transaction. Agoro Carbon has a legitimate interest in disclosing or transferring your personal data to a third party in the event of a Business Transaction.

(e) Third parties with whom you share personal data through the Agoro Carbon Platform

- The Agoro Carbon Platform may enable you to grant access to or share your personal data with other individuals or organizations in relation to the Agoro Carbon Platform, for example with advisors who assist you in decision-making and activity within the Agoro Carbon Platform, growers who you recruit to the Agoro Carbon Platform, and social media or service providers, such as DocuSign, which allow you to execute agreements electronically.

As well as where otherwise prescribed, Agoro Carbon shares personal data with third parties in order to comply with applicable law and regulations, enforce Agoro Carbon's (and our representatives' and group's) rights, terms and conditions, privacy, safety or property.

6.2. WHERE AGORO CARBON TRANSFERS YOUR PERSONAL DATA

Your personal data may be stored and processed in any country where Agoro Carbon has facilities or in which it engages service providers, including in countries outside the European Economic Area (EEA) that may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here). For transfers from the EEA to countries not considered adequate by the European Commission, Agoro Carbon has sought to put in place adequate measures to protect your personal data.

- (a) For transfers within the Agoro Carbon group of companies, Agoro Carbon has set up the Data Privacy Directive available here.
- (b) Service providers outside the EU/EEA are requested to ensure transfers are based on a valid transfer mechanism, such as Binding Corporate Rules or standard contractual clauses adopted by the European Commission. You may obtain a copy of these measures by contacting Agoro Carbon as set out in Section 4 of this Privacy Policy.

6.3. THIRD PARTY SERVICES

The Agoro Carbon Platform enables you to obtain certain services from third parties. For example, it may be possible to:

- (a) Share content with social media.
- (b) Procure the Agoro Carbon Platform through a third party advisor.
- (c) Grant third parties access to your personal data, such as advisors who assist you in decision-making.
- (d) Execute electronic digital agreements.

Where you do so, your personal data may be collected by those third parties, such as DocuSign, and not by Agoro Carbon. Agoro Carbon is not responsible for the privacy and security practices of such third parties, which are subject to their own privacy policies, rather than this Privacy Policy.

6.4. PUBLIC FORUM

By using the Agoro Carbon Platform, you may choose to disclose personal data on message boards, blogs and other services to which you are able to post information (including our social media pages). Please note that any information you post or disclose through these services will become public, and may be available to other users and the general public. To request the removal of your personal data from our blog or community forum, contact Agoro Carbon (see Section 4). In some cases, Agoro Carbon may not be able to remove your personal data or some content (if, for example, it is reposted by another user).

7. HOW AGORO CARBON SOURCES AND RETAINS YOUR PERSONAL DATA

Agoro Carbon and its services providers collect personal data from various sources, such as:

- (a) Through the Agoro Carbon Platform
 - Agoro Carbon collects personal data through the Agoro Carbon Platform, for example, when you register on an Agoro Carbon Platform, set up a user profile and enter field data.
- (b) Offline
 - Agoro Carbon collects personal data from you offline, for example, when you attend Agoro Carbon's events or contact Agoro Carbon's service.
- (c) From other sources
 - Agoro Carbon obtains data from other sources, for example:
 - o Publicly available databases (available to the population at large, or to specific relevant groups such as the farming community), for example to review certified carbon credit statistics.
 - o Your employer or public authorities as part of enabling the Agoro Carbon Platform.
 - o Advisors who refer growers to the Agoro Carbon Platform, when they share personal data with Agoro Carbon.
 - o Growers, when they provide information about their advisors.

Agoro Carbon retains your personal data for as long as needed or permitted in light of the purpose(s) for which they were obtained and consistent with applicable law. The criteria used to determine Agoro Carbon's retention periods include:

- (a) The length of time Agoro Carbon has an on-going relationship with you and provide the Agoro Carbon Platform to you (for example, for as long as you have an account with Agoro Carbon or keep using the Agoro Carbon Platform), or to enable you to conduct your activities and meet your retention requirements. For example, as a rule of thumb regarding grower personal data, Agoro Carbon seeks to re-assess the need to retain data within five years after a grower ceases to be registered with the Program (for example, to allow Agoro Carbon to answer complaints or inquiries that may still arise). However, there are also other factors that may influence that period as set out below.

(b) Whether there is a legal, regulatory, contractual, or industry code obligations to which Agoro Carbon is subject. For example, certain laws require Agoro Carbon to keep records of your transactions for a certain period of time before Agoro Carbon can delete them. Also, carbon credit accreditors may ask Agoro Carbon to retain your contact information, location or farming data in order to be eligible for environmental benefits.

(c) Whether retention is advisable in light of Agoro Carbon's legal position (such as in regard to litigation or regulatory investigations), industry code or contractual obligations.

8. SENSITIVE INFORMATION

Unless Agoro Carbon requests it, Agoro Carbon asks that you not send it, and you not disclose, any sensitive personal data (for example, social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on the Agoro Carbon Platform.

9. COOKIES

The Agoro Carbon Platform may use cookies and similar technologies. This section describes Agoro Carbon's practices in that respect.

9.1. WHAT ARE COOKIES AND SIMILAR TECHNOLOGIES?

Cookies are a standard feature of websites that allow Agoro Carbon to store small amounts of data on your computer or device about your visit to the Agoro Carbon Platform. Cookies help Agoro Carbon learn, for example, which areas of its website are useful and which areas need improvement. For this purpose, Agoro Carbon also uses technologies similar to cookies, such as pixel tags.

You can choose whether to accept the use of cookies and similar technologies in general by changing the settings on your browser, or by changing specific settings for the Agoro Carbon Platform (as set out in Section 9.3). However, if you disable cookies and similar technologies, the quality of your experience on the Agoro Carbon Platform may be diminished and some features may not work as intended.

9.2. WHAT COOKIES AND SIMILAR TECHNOLOGIES DOES AGORO CARBON USE?

Below, the different types of cookies and similar technologies that are used on the Agoro Carbon Platform are identified. To the extent that personal data are collected through cookies, the other Sections of the Privacy Policy apply and complement this Section 9.

(a) Essential Cookies. Essential cookies enable you to navigate the Agoro Carbon Platform, such as Agoro Carbon's websites, and to use their services and features. For example, without these absolutely necessary cookies, the website will not perform as smoothly for you as Agoro Carbon would like it to and Agoro Carbon may not be able to provide the website or certain features. Such cookies include, for example, those to remember what you place in your shopping cart or to authenticate you before signing into your Agoro Carbon account.

(b) Preference Cookies. Preference cookies collect information about your choices and preferences, and allow Agoro Carbon to remember language, age, communication preference and other local settings, and customize the Agoro Carbon Platform accordingly.

(c) Social Media Cookies. Social media cookies collect information about social media usage. They enable Agoro Carbon to perform market research or marketing.

(d) Analytics Cookies. Analytics cookies collect information about your use of the Agoro Carbon Platform, such as Agoro Carbon's websites, and enable Agoro Carbon to improve the way they work. For example, analytics cookies show Agoro Carbon which are the most frequently visited pages on Agoro Carbon's website, time spent and links clicked on pages or what users like and do not like and help Agoro Carbon to record any difficulties you have with the website. This allows Agoro Carbon to see the overall patterns of usage on the website, rather than the usage of a single person. Agoro Carbon uses the information to analyze website traffic, but Agoro Carbon does not examine this information for individually identifying information.

(e) Google Analytics. Google Analytics service is provided by Google, Inc. Agoro Carbon uses Google Analytics to collect anonymized statistics in order to improve the Agoro Carbon Platform. You can learn about Google's practices by going to Google Analytics and privacy, and opt out of them by downloading the Google Analytics Opt-out Browser Add-on. Agoro Carbon has taken the following measures to protect the data collected through Google Analytics:

- Agoro Carbon has concluded a data processing agreement with Google about how Google may process the data collected through Google Analytics.
- Agoro Carbon has configured Google Analytics settings to mask the last octet of user IP addresses.
- Agoro Carbon has configured Google Analytics to not share data with third parties.
- Agoro Carbon does not use other Google services in conjunction with Google Analytics.

(f) Pixel tags. Pixel tags (also known as web beacons and clear GIFs) are used to, among other things, track the actions of users of Agoro Carbon's websites, measure the success of Agoro Carbon's marketing campaigns, and compile statistics about usage of Agoro Carbon's websites and response rates.

(g) Browser or Device Information. Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the website you are using. Agoro Carbon uses this information to ensure that its websites and the Agoro Carbon Platform function properly.

9.3. HOW TO MANAGE COOKIES AND SIMILAR TECHNOLOGIES

You can change your settings for cookies and similar technologies as described in the documentation pertaining to the Agoro Carbon Platform. In addition, you can refuse or accept cookies from Agoro Carbon's websites at any time by modifying the settings on your browser. Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider's website via your help menu. Please refer to <https://www.allaboutcookies.org/manage-cookies/index.html> for information on commonly used browsers. Please be aware that if cookies are disabled, not all features of Agoro Carbon's websites may operate as intended.

If you want to clear all cookies left behind by the websites you have visited, here are links where you can download three programs that clean out tracking cookies:

- (a) https://www.lavasoftusa.com/products/ad-aware_se_personal.php
- (b) <https://www.spybot.info/en/download/index.html>
- (c) <https://www.webroot.com/consumer/products/spysweeper/>

10. CHANGES TO AGORO CARBON'S PRIVACY POLICY

Agoro Carbon may update this Privacy Policy from time to time to meet Agoro Carbon's business requirements and/or comply with statutory provisions. You can see the date of the latest update at the top of this Privacy Policy. If Agoro Carbon makes material or substantive changes to one of Agoro Carbon's privacy policies, Agoro Carbon will seek to actively bring those changes to your attention.