



## Privacy Policy & Cookie Notice

Last Updated September 2021

This privacy policy describes how CattleEye Limited (“**CattleEye**”, “**us**”, “**our**”, and “**we**”) collects, uses and shares personally identifiable information belonging to farms, distributors, website users, and end-users who access our services (“**Personal Data**”). Each of these provides or shares Personal Data through their interactions with us or through their use of, our services and products. Typically these exchanges occur through our browser-based SaaS platform where video footage and insights can occasionally show images data belonging to people and not just the cattle our systems are monitoring. Personal Data is also contained in any application we publish for download (an “**App**”) or through our website (<https://cattleeye.com/> (the “**Site**”). Occasionally, video footage and personal details can be exchanged or accessed through training we conduct or through our support team who need access to that data.

Please read this privacy policy carefully to understand our practices toward your Personal Data. By visiting the Site, using our system or SaaS platform or by sending us information, you accept and fully consent to the practices described in this policy. CattleEye adheres to evolving data protection law. We adhere to Regulation (EU) 2016/679 (the “**EU GDPR**”) as it continues to apply to our activities or customers in the EU. We also comply with the retained version of the EU GDPR as it applies from 1 January 2021 in the UK (as amended and updated from time to time) (the “**UK GDPR**”).

### WHAT WE COLLECT AND WHERE WE COLLECT IT

**CattleEye categorises the different data it processes into approximately three main categories:**

1. Raw Data includes data: (i) collected from Customer's IT systems, (ii) collected from 3rd party products that the Customer uses (to the extent permitted by such licensing terms), (iii) collected manually by the Customer (e.g. paper, Excel spreadsheet), (iv) inputted by a Customer into a CattleEye digital product (e.g. SaaS application), and (v) produced by a sensor or other component of a physical digital product from CattleEye
2. Enhanced Data (restricted or unrestricted) includes: (i) human or machine interpretation of unstructured data, (ii) datasets combining Raw Data with CattleEye-owned data, (iii) parameters of a mathematical model fit or trained using the Raw Data, (iv) signal output from a digital signal processing algorithm that uses sensor Raw Data
3. Anonymized and/or aggregated data includes data: (i) internally manipulated through use of an algorithm or other mechanism or (ii) aggregated by CattleEye such that the data is part of a larger pool of data. As such there is no Personal Data by definition contained in anonymized and aggregated data and so data privacy rules do not apply.

### WHERE DO WE COLLECT THIS DATA

- **Information You or your Farm Give Us**

If you are an end user, we may collect your name, postal address, email address, phone number, fax number, username, password, demographic information (such as your gender and occupation). Occasionally we will be in receipt of other personal identifiers such as an individual's image obtained incidentally through a piece of video footage or analytics connected to particular cattle.

All of this Personal Data may come to us when someone:

- registers to become an authorised end user of our Site;
- sends us or the support team a message;
- becomes a distributor of our products or services (or works for a distributor);
- contributes to our technology, products and services (by participating in a training session or developing enhancements to the video analytics and its capabilities);
- participates in a discussion board on the Site or on social media; or
- reports a problem to us.

• **Information We Get From Others**

We may get information about you from other sources such as distributors, integrated farm management systems (if we are linked to these), and key partners. There will be occasion when the source material received by us will contain Personal Data. We may add this to information we hold from this Site and other sites so that it essentially becomes Enhanced Data as set out above.

• **Information Automatically Collected**

We may automatically log non personally identifiable information about you, your usage of the CattleEye system and our Saas platform, and the cookies and browser on your computer. For example, when visiting our Site, we may log your computer operating system type, browser type, browser language, the website you visited before browsing to our Site, access times, pages you viewed, how long you spent on a page, page interaction information (such as scrolling, clicks, and mouse-overs) and other information about your use of and actions on our Site. From time to time, we may compile or produce non-Personal personally identifiable information in the aggregate, e.g., by examining video analytics of cattle or releasing statistics about the trends we are witnessing in the industry or in particular herds. We may also collect potentially personally identifiable information such as Internet Protocol (IP) addresses for logged-in users and for end users leaving comments on discussion boards or on social media channels which may or may not be linked to our Site. We disclose any such personally identifiable information (which individuals have made public in any event) subject to the same policies described under “Sharing of Personal Data” below.

**Cattle Eye as both Data Controller & Data Processor?**

It is common among providers of Saas solutions and applications that there are occasions when the Company is at certain times controller (for example of the Enhanced Data, video-footage and ensuing insights and employee data in its business) and also at other times a processor where we act under instruction from paying customers such as farms (who themselves determine the content and inputs of Raw Data put into our system). They will be the data controller in those use-cases. The diagram below helps explain the difference.

**Data processor vs Data controller**

When is CattleEye a data processor and when are we a data controller?

**CattleEye is a Data Processor**



**Adhering to specific requests from Customers -** pursuant to our contracts with them (invoicing requests, where to send video-analytics)



**Content and Input decisions –** we process the video footage, inputs and text uploaded by others for analysis using our AI/tools

**CattleEye is a Data Controller**

- Feedback & analytics requests**  
We assist the customer when it requests feedback information from us
- Technical Information we generate** – video analytics, herd-insights, website usage, frequency of visits, cookie data
- Software updates & preserving and using the Enhanced Data and the AI technology** - We control the technology, the production of the analytics, and are responsible for any software modifications
- Enabling the Saas web-based portals, hosting our Site, publishing testimonials/case studies, working with partners and distributors**

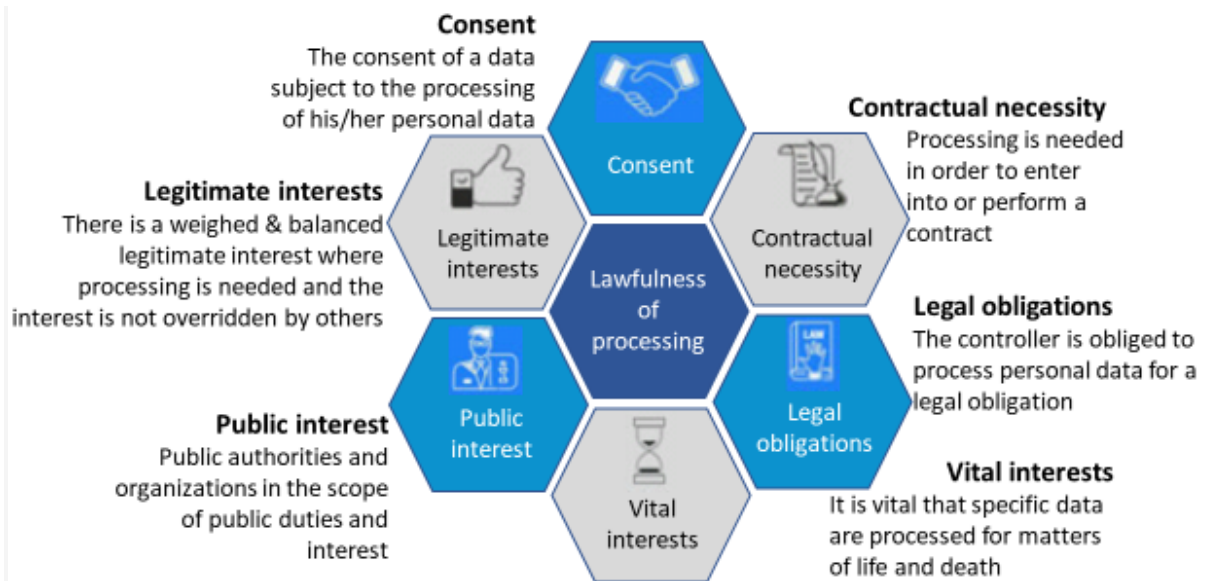
\*This infographic is not exhaustive but is illustrative of the different kinds of interactions we have with Personal Data.

**CattleEye’s use of Cookies**

We log information using “cookies.” Cookies are small data files stored on your hard drive by a website. We may use both (1) session cookies (which are added automatically to your browser by the server software but not used by our Site and expire once you close your web browser) and (2) persistent or analytical cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. Such cookies may record, among other things, the time of your first visit to the Site, the time of your most recent visit to the Site, the time of your current visit to the Site, which page(s) you visited on the Site, how long you stayed on the Site and how you located the Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs. Many browsers are set to accept cookies until you change your settings. However, you can typically remove and reject cookies from our Site with your browser settings, or adjust your browser to tell you when a website tries to put a cookie on your computer. Users based in the European Union can [opt out of these third party cookies](#). This website-link is not connected to us and we are not responsible for its content. We only keep cookies for the duration of your visit to our Site, except in the case of cookies which remember you for future visits or where you save your login name as referred to above. If you remove or reject our cookies, it could affect how our Site works for you.

**OUR LAWFUL BASES FOR COLLECTING AND USING YOUR PERSONAL DATA**

Data protection laws requires CattleEye to have one or more lawful bases (as set out in the EU GDPR and UK GDPR) for processing and holding any Personal Data that may reside in any Raw Data or Enhanced Data we utilise. The six forms of lawful basis that are available are summarised in the info-graphic below:



CattleEye works with many partners, animal welfare experts, farms, and distributors involved in all aspects of herd monitoring and farm management. With each of these will likely have agreements in place and therefore we will have obligations to fulfil out of **contractual necessity**. In the case of farms, ranches and customers, we have production obligations regarding the processing of the Raw Data provided to us through the cameras and hardware. We apply our expertise, AI algorithm and technology to create high quality analytics and insights for our customers. We then also have invoicing and customer management obligations under these contracts.

There are other occasions when CattleEye reserves the right to directly take your freely given, unambiguous and informed **consent** to our processing of your Personal Data. At Cattle Eye we insist on taking every end user’s consent so that every end user will have consciously consented to the processing of his or her Personal Data as part of the EULA (end user licence agreement) that binds users and the Company.

There will be many other occasions, especially for our out-reach initiatives, promotional activities, and training programmes where we validly rely on our **legitimate interests** as a modern business bringing our innovative solution to the agri and tech sectors.

Please be assured, when we do use your data for outreach or promotional purposes, we will do so responsibly. We will ensure periodically that we continue to have **a legitimate interest** in doing so (in compliance with EU GDPR and UK GDPR ). This means that through this policy we are happy to commit to continually assessing our legitimate business needs against the needs to maintain and protect individual rights and freedoms. We are happy to make our up to date assessment of our legitimate interests available to you upon request.

In summary, we conduct a 3-stage test to challenge ourselves and confirm our legitimate interests to hold Personal Data as follows:

- (i) We **identify** what our legitimate business interests are at any given time – and these will almost always include our core business intention to innovate and modernise in the field of herd monitoring, animal welfare assessment, and overall farm management



using our cutting edge technology and knowhow. This has wider societal benefits outside and additional to our own commercial objectives as a company.

- (ii) We check the **necessity** of processing an end user, customer or distributor's Personal Data in order to properly deploy, test, and improve our Saas platform, App, and services. We check that there are no any less intrusive means to deliver CattleEye's functionality than through the kinds of contact and outreach we engage in.
- (iii) We make sure we **weigh the balance** of the interests of our business and our AI-based technological solution with the interests of the people we contact and whose information we hold. We remain of the view our actions and communications progress is proportionately conducted whilst respecting the rights of individuals as far as possible, as we grow and reach new markets and more customers.

Finally, we ensure that our legitimate interests are prudently counterbalanced against the constant right of individuals to make a data access request to us (such as an objection to processing). Anyone can make such a request to us at any time.

### USE OF PERSONAL DATA

We may use your Personal Data as follows:

- to operate, maintain and improve our Site, products, and services;
- to refine and send out video-footage and video analytics which rarely may contain images of living individuals and will be sent to an individual
- to publish and highlight testimonials, trends, or case studies on our Site from individual farms or people we have worked with
- to respond to comments and questions and provide good customer service;
- to send information including confirmations, invoices, technical notices, updates, security alerts and support and administrative messages.
- to communicate about promotions, upcoming events and other news about products and services offered by us and our selected partners;
- to link or combine Personal Data with other data (to turn it into Enhanced Data or Anonymised Data potentially);
- to protect, investigate and deter against fraudulent, unauthorized, or illegal activity (including misuse of the hardware, cameras or our software); and
- to provide and deliver new and enhanced products and services which customers request through a customer portal or otherwise.

### SHARING OF PERSONAL DATA

Your Personal Data will not normally be disclosed to third parties except for where it is necessary for fulfilment of our obligations to you, or where we are obliged or permitted to do so by law (including, without limitation, under any customer contract with a farm or EULA with you, which is in place). We may share your Personal Data as follows:

- We may share Personal Data with your consent which you provide when you register to use our services. For example, you may let us share Personal Data with others for their own marketing uses. Those uses will be subject to their privacy policies. Please Note – you can withdraw your consent at any time by writing to let us know you no longer consent to [dataprivacy@cattleeye.com](mailto:dataprivacy@cattleeye.com)
- We may share Personal Data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- We may share Personal Data for legal, protection and safety purposes.





- We may share information to comply with laws including contracts that we have in place with customers and you (the EULA).
- We may share information to respond to lawful requests and legal processes (including by law enforcement agencies or any regulatory or government authority in response to any request including requests in connection with the investigation of any suspected illegal activities).
- We may share information to protect the rights and property of CattleEye Ltd, our agents, customers and others. This includes enforcing our agreements, policies and terms of use.
- We may share information in an emergency to protect someone's vital interests. This includes protecting the safety of our employees and agents, our customers, or any person.
- We may share information with those who need it to do work for us.

We may use small elements of Personal Data that may be part of the Raw Data or Enhanced Data to share it with our partners or with our service providers, for the specific scope of their provision of services.

We may also share aggregated and/or anonymized data (which contains no Personal Data) with others for their own uses.

### **USE OF YOUR PERSONAL DATA OUTSIDE THE UK & EU**

In order to provide you with requested products and services we may need to transfer your Personal Data outside the UK and European Economic Area (the “EEA”) or to our overseas partners, especially those in the USA. This does not diminish your rights and you may withdraw your explicit consent to such transfers which you give upon registering as an end user and as part of the EULA you are bound by.

Even if you withdraw your consent, please be assured that CattleEye Ltd will take all reasonable steps necessary to ensure that any Personal Data transferred outside the UK and EEA will benefit from the appropriate safeguards, conducting any transfer impact assessment as appropriate, as set out under the UK GDPR or EU GDPR as the case may be.

### **INFORMATION CHOICES AND CHANGES**

Our commercial agreement with customers in conjunction with our EULA with you creates the basis upon which we may send marketing and promotional emails to you. Nonetheless we will tell you how to “opt-out” from such communications if that is your preference. If you opt out, we may still send you operational and important product emails related to the Saas platform or the EULA. Non-marketing emails also include information about your accounts, your security, and our business dealings with you.

You may send requests about Personal Data to [dataprivacy@cattleeye.com](mailto:dataprivacy@cattleeye.com). You can request to change contact choices, opt-out of our sharing with others and update your Personal Data.

### **DATA SECURITY**

We have policies and technical measures in place designed to safeguard and protect your Personal Data against unauthorised access, accidental loss, improper use and disclosure. However, you should remember that electronic communications and the internet are not completely secure. While we will do our best to protect your Personal Data, the transmission of your data to us is done so at your own risk.

### **LINKS TO EXTERNAL SITES**

This Site may contain links to external sites not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy and the terms of use of every external site you visit.



We have no control over and assume no responsibility for the content, privacy policies, terms of use or practices of any third party sites, products or services.

## **YOUR RIGHTS**

For the limited amounts of Personal Data we hold (recognising that most data we hold will relate to video footage of herds and cattle), you have enshrined rights under the EU GDPR and UK GDPR:

- The right to be informed about our use of your Personal Data. This is met by this Policy.
- The right to access information we hold about you and to obtain information about how we process it (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Please note that we may ask you to specify what you wish to see in order to focus our search, and we may have to verify your identity/authority.
- In some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- In some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;
- The right to request that we rectify your information if it’s inaccurate or incomplete though we may need to verify the accuracy of the new data you provide to us.
- In some circumstances, the right to request that we erase your information where there is no good reason for us continuing to process it. We may continue to retain your information if we’re entitled or required to retain it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- The right to object to, and to request that we restrict, our processing of your information in some circumstances for example where we are relying on our legitimate interests or using it for direct marketing. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we’re entitled to continue processing it and/or to refuse your request.

## **CONTACT INFORMATION**

We welcome your comments or questions about this privacy policy. You may contact us at our primary place of business (below), phone number or e-mail address.

Attn: CEO/ Data Protection Officer

Email: [dataprivacy@cattleeye.com](mailto:dataprivacy@cattleeye.com)

In the event of a complaint, please use the above email address to contact us directly. In the event you remain dissatisfied after raising an issue with us in connection with this privacy policy, you are free to contact the Information Commissioner’s Office at the following address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF



Tel: 0303 123 1113 (local rate)

### **CHANGES TO THIS PRIVACY POLICY**

We may change this privacy policy. If we make any changes, we will change the Last Updated date at the top of this document.