

European Union General Data Protection Regulation Addendum

If you are an individual residing in the European Union (“**EU**”), this General Data Protection Regulation (“**GDPR**”) Addendum will apply to you in addition to our Privacy Policy.

Individuals residing in the EU have certain rights as to how personal data is obtained and used. We comply with the principles of data protection set out in the GDPR.

We are a data Controller established in the European Union for the purposes of the GDPR. By consenting to this Privacy Policy we are able to process your personal data in accordance with this Privacy Policy.

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1. **How do we collect your personal data?**

Most of the personal data we process is provided to us directly by you when you:

- o engage directly with our staff or authorised representatives when seeking or enquiring about our products or services;
- o register to use our products or services (including IrriMax Live) on our website;
- o interact with our websites, services, content, and/or advertising and media campaigns;
- o voluntarily complete a customer survey or provide feedback;
- o use or view our website via your browser’s cookies;

We may receive your personal data indirectly from our Italian subsidiary; Sentek SRL. Sentek SRL is a data processor for the purposes of the GDPR and acts as our agent in Europe.

In such a case we will take reasonable steps to ensure that you are made aware of the personal data provided to us by the third party.

2. **What kind of personal data do we collect?**

The types of personal data collected by us are outlined in the ‘Collection of personal information’ section of our Privacy Policy.

We collect and process your personal data necessary in order to provide you with our services and/or products. Depending on the circumstances, the following are the types of personal data you might provide us:

- o your name and contact information, such as phone number, address, email address;

- o financial information such as your bank and cheque account information, credit card details and information about your credit history;
- o employment information including where you are employed and information about your employer;
- o company details such as registration numbers, addresses, phone numbers, web addresses, and email addresses;
- o account information, such as your account name and password;
- o device and network information, such as your IP address an operating system; and
- o the content of your communication with us, such as feedback and technical support requests.

3. **How do we use your personal data?**

We collect and use your personal data for the following reasons:

- o as a necessary part of providing our goods and services, including software, to you;
- o to promote and market our products to you;
- o to personalise and customise your experience with our website;
- o to help us understand the needs of our customers and improve our products;
- o to enable you to access and use our website or services;
- o account maintenance;
- o to better understand how our customers use our products and services;
- o to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting; and
- o to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

4. **How will we process your personal data?**

We collect, store and process personal data where we have a lawful basis to do so. The lawful basis for which we collect your personal data depends on the data we collect and how we use it. The lawful bases that may apply to our processing activities are:

- o **Consent** – you have given clear consent for us to process your personal data for a specific purpose.
- o **Contract** – the processing of your personal data is necessary for the performance of an agreement with you to provide our products and/or services.
- o **Legal obligation** – the processing of your personal data is necessary for us to comply with the law (not including contractual obligations).
- o **Legitimate interests** – the processing of your personal data is necessary for our legitimate interests or the legitimate interests of a third party except where such interests are overridden by your prevailing legitimate interests and rights.

We will not process any of your personal data that is considered "sensitive data" under the GDPR unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

5. **How do we use data processors?**

We employ a data processor to process personal data on our behalf. We only do this on the basis that such data processors comply with the requirements under the GDPR. This includes data processors having appropriate technical and organisational measures in place to protect personal data against unauthorised use, loss or theft, and having a legal basis for the collection of such data.

As a data Controller, we provide instructions to our processors, namely our Italian subsidiary; Sentek SRL, on how to collect and handle personal data.

6. **How do we share personal data with third parties?**

In certain circumstances, we may share information with affiliates, partners, service providers, authorised resellers and distributors and relevant third parties in order to fulfil the limited purposes described above. When we share your personal data, we require the recipient to protect your personal data in compliance with the law. Please see our Privacy Policy for information on how we disclose personal data with third parties.

7. **Do we transfer your personal data outside the EU?**

We will transfer or disclose personal data outside the EU, primarily to Australia. We may also disclose information to related entities within Israel and the United States. With your consent, we may also transfer your personal data to other jurisdictions where necessary to provide our goods and services to you. Data transfers are made in order allow us to provide goods and services to you.

If we transfer personal data outside the EU, we will take reasonable steps to ensure that the recipients of such information do not breach the GDPR Privacy Principles, and where appropriate the privacy laws of Australia, in relation to that information, including by entering into binding contractual arrangements with any such third parties.

8. **How do we keep your personal data secure?**

Appropriate security systems and procedures are employed to ensure the security of Sentek's data and customer information. A number of systems with various types of customer data and personally identifiable information are utilised, with some stored onsite and some with cloud providers. All systems are controlled by individual login accounts with varying levels of access for different staff and departments as appropriate. Relevant systems also employ audit logging where possible.

Where appropriate, the transfer of data is done through encrypted means. All PC's run antivirus software which updates constantly and firewalls are used in all offices. We also store physical records at our offices in Adelaide, Australia and on the servers of a number of third party service providers.

We aim to protect your personal data by:

- o imposing confidentiality requirements on our employees;
- o implementing policies in relation to document storage security;
- o implementing security measures to govern access to our systems;
- o only providing access to personal information once proper identification has been given; and

- o controlling access to our premises.

We may retain your personal data to fulfil the purposes outlined in this Addendum for as long as needed, as allowed, or as required by law. For instance, we may retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, prevent fraud and abuse and fulfil and enforce our agreements.

In the event of a data breach, we are committed to complying with the requirements of the GDPR. If we detect a high-risk data breach, we will notify you without undue delay and help guide you through steps to ensure better protection.

9. **What are your rights in relation to your personal data?**

In addition to the rights in our Privacy Policy, you have rights with respect to your personal data under the GDPR. Your rights include, but are not limited to:

- o **Right of access** – you have the right to ask us for copies of your personal data.
- o **Right to rectification** – you have the right to ask us to rectify your personal data you think it is inaccurate. You also have the right to ask us to complete your personal data if you think it is incomplete.
- o **Right to erasure** – you have the right to ask us to erase your personal data.
- o **Right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data.
- o **Right to object to processing** – you have the right to object to the processing of your personal data.
- o **Right to data portability** – you have the right to ask that we transfer the personal data you gave us to another organisation, or to you.

These rights are not absolute, and some only apply in certain circumstances.

You are not required to pay any charge for exercising your rights.

If you make a request in relation to any of these rights, we have one month to respond to you. Please contact our Privacy Officer at the information below if you wish to make a request.

10. **How do we use cookies?**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

We use cookies in a range of ways to improve your experience on our website, including:

- o allowing you to log-in and interact with our website;
- o track how you interact with our website; and
- o measuring marketing conversions.

The types of cookies we use on our website include:

- o **Functionality** – We use these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in.

- o **Advertising** – We use these cookies to collect information about your visit to our website, the content you viewed, the linked you followed and information about your browser, device, and your IP address. This information assists us with determining how effective our online marketing is.

We use third party services to provide us with these services. This includes WordPress and Google Analytics.

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

11. **How to contact us with questions?**

If you have any questions about our privacy policy, your personal data held by us, or if you would like to exercise one of your data protection rights, please do not hesitate to contact us at:

Attn: Privacy Officer
Sentek Pty Ltd
77 Magill Road
STEPNEY SA 5069
AUSTRALIA
+61 8 8366 1900
sentek@sentek.com.au

12. **How to complain to the supervisory authority?**

Should you have any concerns, or wish to exercise your rights in relation to our collection and processing of your personal data, then in addition to the process set out in the "Complaints" section of our Privacy Policy, you have the right to complain to the supervisory authority:

Garante per la Protezione dei Dati Personali (the "Garante")
Piazza Venezia n. 11 - 00187 Rome (Italy)
(+39) 06.696771
garante@gpdp.it
www.garanteprivacy.it