



Kynetec

Direct Marketing Privacy Notice

This Privacy Notice explains how we collect, use, disclose and protect Personal Data for direct marketing and for third-party marketing

Dated: April 2024

Issued by:

Data Protection Team

Contact:

Kynetec: data.protection@kynetec.com

1 About Kynetec

Kynetec is a global leader in agricultural and animal health data analytics and insights. Our main respondent groups are farmers, agronomists and veterinarians. In June 2022, in the UK, Kynetec acquired Map of Ag Analytics, a company providing data platforms connecting farms and industry.

Our core business is to collect and process information about availability, usage or performance of specific services, products or industries, to support our clients and business partners. We are committed to very strict ethical standards and business targets. We never share statements from or about individuals. Reporting is generally limited to general information, like behavior, opinions and attitudes of predefined target groups, or market development, market shares, average prices.

We comply with all respective obligations under applicable global data privacy laws such as, but not limited to, GDPR, the UK Data Protection Act 2018 and with all applicable professional rules such as, but not limited to, ICC/ESOMAR International Code of Marketing and Social Research Practice. Kynetec is a member of ESOMAR, an international organization focusing on developing better market research methods. We adhere to the professional standards which ESOMAR sets out for its members and, at the same time, protect your privacy as a participant in our market research activities. Kynetec has been awarded a Fair Data Accreditation from the Market Research Society in the UK which demonstrates our visible commitment to the handling of personal data and our adherence to the 12 Fair Data Principles. For more information on Fair Data, please visit <https://www.fairdata.org.uk/>

This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed for the use of direct marketing. When we contact you, calls may be recorded for quality and monitoring purposes. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2 Personal Data we collect

We may collect information that can specifically identify you, such as your name, address, telephone number, email address, profession, an audio/video recording as described further below. when you voluntarily submit it to us. This notice does not apply to data where the identity has been removed (anonymous data).

- We receive personal data directly from you, for example when you provide information about your marketing preferences. We also receive personal data from other sources, such as:our clients
- publicly available databases
- third party data providers
- joint marketing partners

The type of personal data we collect and use has been grouped together as follows:

- **Identity** – includes name, , gender (salutation), age, an audio/video recording
- **Contact** – includes physical address, email address and telephone numbers
- **Financial** – includes bank account details
- **Transactional** – includes details about payments between Kynetec and their suppliers and clients
- **Marketing information** – includes preferences on receiving marketing from us (for

- example our e-newsletters) and our third parties and your communication preferences
- **Research** – includes survey data or other data collected from participation in research studies

We have no intention of collecting or processing personal data from children or young people. If we become aware that personal data from a child under the age of 16 has been inadvertently collected without parental or guardian’s consent, we will use all reasonable efforts to delete such information unless the original data collection exercise requires such information.

3 Use of personal data

Processing data is our core function to deliver market research studies to our clients. Regarding direct marketing activities, we have set out below for Research Participants what lawful basis we rely on to do so. We will only use personal data for the purposes for which we collected it as set forth in this privacy notice or in our [General Privacy Notice](#), unless you have specifically provided your consent to another use of your personal data. If we need to use your personal data for an unrelated purpose, we will notify you and explain the lawful basis which allows us to do so.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you would like more details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

Research participants

| Purpose / Activity | Type of Data | Lawful basis for processing, including basis of legitimate interest |
|--|--|---|
| To send you our farmer newsletters | a) Identity b) Contact c) Research | Legitimate interests in promoting our business and your consent where we request it |
| To supply agribusiness entities with details of individuals who may be interested in their products and services | a) Identity b) Contact | Your consent to pass your details on to other agribusiness companies |
| To manage your marketing preferences | a) Marketing information | Legitimate interests in promoting our business and consent where we request it |

Kynetec is a member of the UK’s Market Research Society (MRS) <https://www.mrs.org.uk/> and ESOMAR <https://www.esomar.org> and complies to their standards

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4 How we share personal data

We will disclose your personal data only as described below. We will take appropriate measures to ensure that your personal data is processed, kept secure and transferred or accessed according to applicable global laws.

1. Legal entities within the Kynetec group of companies

We are a global organization. Personal data may be transferred or accessed via a secure portal by one or more affiliated companies. We guarantee that the processing of such personal data will take place exclusively in the UK, a Member State of the EU or another country of the European Economic Area, in a third country that has been determined by the European Commission or UK government as ensuring an adequate level of data protection (see [here](#) for a list of countries determined as adequate by the UK government and [here](#) for a list of countries determined as adequate by the European Commission) or to another country we have put in place appropriate safeguards for the transfer, such as standard contractual clauses.

2. Business transfers

In connection with any business reorganization, restructuring, merger or sale, or other transfer of assets, we will transfer data (including personal data) as necessary, provided that the receiving party agrees to respect your personal data in a manner that is consistent with applicable data protection laws. We will continue to ensure the confidentiality of any personal data and give notice should any personal data become subject to a different privacy notice.

3. Public bodies

We will only share your personal data with public bodies where we have a duty to disclose this as required by law; for example, requests from courts, regulatory agencies, law enforcement agencies and other public and government authorities, which may include authorities outside your country of residence.

4. Agents, Contractors and Third-Party service providers

We will only share your personal data with our agents, contractors and third parties where we have a legitimate business need to disclose this in order that they may perform their duties. We share your personal data with them as they are our service providers and act as processors, notably service providers (for example for marketing campaigns, email or postal campaigns). They will only process your personal data on our instructions and they are subject to a duty of confidentiality. All our agents, contractors and third parties (generally speaking our service providers), are required to sign a Data Processing Agreement with us prior to commencing any work for us.

5. Third-party marketing, ie. third- party agribusiness entities where you have given specific consent for us to share your details with such businesses (“indirect third-party consent”). Please see a list of these Third-party entities in Appendix A.

You can ask us or third parties to stop sending you marketing messages or calling you at any time by unsubscribing on any marketing message sent to you or by contacting us at any time.

5 Security

The security of your personal data is very important to us. We have put in place appropriate physical, electronic and administrative security measures to safeguard the information we collect.

In the event of a suspected data breach containing personal data, we will follow all applicable data breach notification laws.

6 Your legal rights

As a data subject you have specific legal rights relating to the personal data we collect from you. We will respect your individual rights and will deal with your concerns appropriately.

Data subjects have the right to:

- **Request access** to your personal data (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.
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data. If we are unable to comply with your request of erasure for specific legal reasons, we will notify you of these reasons (if applicable) at the time of your request.
- **Object to processing** of your personal data
- **Request portability** of your personal data to a third party in a commonly used, machine-readable format.
- **Request restriction of processing** of your personal data
- **Withdraw consent at any time.** Please note this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Lodge a complaint** with the relevant country Supervisory Authority (for example, the Information Commissioner’s Office (ICO) is the UK’s supervisory authority for data protection issues).

We will try to fulfill your request within the time period required by law. Occasionally it may take us longer depending on the scope of your request. In this case we will notify you and keep you updated. We will not charge a fee for dealing with your request unless it is deemed to be excessive or repetitive.

If we are unable to give you access to all or some of your personal data due to lawful exemptions, we will advise you of the reason for this.

In some cases, we may not be able to look up your personal data due to the information identifiers you provide in your request. Examples of personal data which we cannot look up are:

- data collected through browser-cookies
- data collected from public social media sites provided you have posted your comment under a username which is not known to us.

In these cases, unless you provide additional identification information, we will be unable to comply with your request.

7 Retention of your personal data

In general, we will delete the personal data we collected from you if they are no longer necessary to achieve the purposes for which they were originally collected. If we receive information that you opted-out of direct marketing and that your consent is not renewed, we will refrain from contacting you for direct marketing activities and will no longer share your data with third parties. We will also inform third parties about the fact that you opted out. However, we may be required to store your personal data for a longer period due to statutory provisions.



In addition, where you have asked us to refrain from contacting you, we will keep some aspects of your personal contact details for the purpose of checking against records containing information on people who do not want to be re-contacted in the future.

Furthermore, regarding direct marketing and, in particular regarding third-party marketing, and indirect third-party consent, we aim to contact you every 18 to 24 months to refresh your opt-in and check your consent. If we are not able to contact you, and are not able to refresh your consent, we will not share data with third parties, and not proceed with third-party marketing. We'll keep your data for a maximum period of 24 months.

8 Changes to this Privacy Notice

We reserve the right, at our discretion, to modify our privacy practices and update and/or make changes to this privacy notice at any time. For this reason, we encourage you to review this privacy notice on an ongoing basis. We will treat personal data in a manner consistent with the privacy notice under which they were collected, unless we have your consent to treat it differently.

9 Contact information

Please direct your questions regarding data protection, any requests in the exercise of your legal rights or if you have any concerns about how your personal data is used to: data.protection@kynetec.com



Appendix A: List of Third- party agribusiness entities with whom we may share your personal data (“indirect third- party consent”)

AGCO

BASF

Bayer Crop Science

CLA

Corteva

Farmer Guardian

Grainseed

KWS

Limagrain

NFU Mutual