

**Valley Agricultural Software, Inc. (“VAS”)
Privacy Policy**

Our Privacy Commitment to You

At VAS, our mission is to help you create a more valuable enterprise. We are committed to working with you to help you achieve your goals. Simply put, our business is helping you improve yours. We do this—in part—by helping you create value from the data you provide us through our software and services.

VAS understands how important your privacy and data are to you. We strive to protect the privacy of your data and the information that VAS and you share. VAS takes your privacy and data ownership seriously: with VAS, you own your data.

Some of the ways that VAS creates value for you is by creating computational data, hosting data, formatting data, and providing technology to help you focus on making the best decisions for your business and to provide you with new insights about your enterprise. To do that, we need a license to use your data. And you need a license to use our data and technology.

As part of the larger dairy family, we all have an obligation to do our part to improve the industry. Part of that is helping all industry players understand what is happening industry wide with respect to best practices and general dairy performance. VAS contributes to this effort—for example—by providing aggregated and anonymized data for research and improving benchmarking analysis.

We would never disclose data or information that could identify you or your business without your permission. VAS wants you to be informed and provide the transparency necessary for you to understand how your data is used and how VAS is creating data that you can use to improve your enterprise.

This Privacy Policy is part of our commitment to transparency and your data ownership and privacy. It includes provisions to help you understand the details of your and VAS’s rights and obligations as we work together to improve your enterprise and the dairy industry. It covers the following:

- Security
- Anonymity: protecting the identity and privacy of customers
- Rights of natural persons using VAS services and software
- Use of VAS and customer data
- Protecting VAS’s system and software
- Contact information for privacy issues

Privacy Policy Provisions

VAS maintains the following Privacy Policy. It may be subject to change from time to time. These changes can be found on this website: www.vas.com.

Scope: This Privacy Policy governs how Valley Agricultural Software, Inc., and any affiliated companies (“VAS”) treats information you share with VAS. Examples of how you share information with VAS includes inputting information into software provided by VAS, providing information to VAS through VAS-provided services, or otherwise provided to VAS—including by sharing information through your use of the VAS website.

Cookies: VAS’s websites, services, and software may use “Cookies” to track your activities and preferences. This allows VAS to make the websites, services, and software more responsive to your needs. A web-page server places a Cookie or data file on your hard disk. Programs cannot be run nor can viruses be delivered using the Cookies. You can accept or deny these Cookies.

Security: VAS will take reasonable efforts to secure your personal information—i.e., information that identifies natural persons—from unauthorized access. Reasonable efforts include encrypting all passwords in the VAS database and sending traffic between VAS controlled systems over encrypted channels. But it is impossible to guarantee that every communication or transmission over the internet is secure. Thus, despite VAS’s reasonable efforts, it cannot guarantee the safety of this personal information. By using VAS’s system, service, or website you agree that VAS will not be held liable for any unauthorized access.

Anonymity: VAS anonymizes data to the extent that it does not interfere with the services VAS provides to you. Anonymize means removing information that would allow anyone to identify you or your business as the source of data. VAS will ask you to expressly opt in before participating in any benchmarking or similar activity that requires data that is not anonymous. VAS and its affiliates will not provide data to others that can identify you or your business without your express permission or unless required by law; for example, you may authorize VAS to share non-anonymized data with another vendor for the purpose of facilitating services you receive from that vendor.

Use of Information: Subject to the Anonymity provision above, VAS and its affiliates use or may use your information in the following ways: Your information is used to provide and improve the services or products offered, licensed, or provided to you by VAS. VAS will also use your information for internal business purposes. VAS may also share your information with affiliates or third parties, in its sole discretion, when VAS is making the disclosure to provide you with or to

improve the products or services offered, licensed, or provided by VAS. VAS, in its sole discretion, may also share your information—except personal information of natural persons—with third parties or to use it for other commercial purposes. VAS, in its sole discretion, may also provide or disclose your information if that disclosure is required by law; if VAS is required to do so to seek remedies for a breach of any end-user agreement or contract; if the data is transferred as part of a sale of VAS or a portion of its business; and if VAS believes disclosure is necessary to protect its rights or the personal safety of others. VAS may also disclose your information to appropriate authorities and financial institutions, as determined by VAS in its sole discretion. VAS may transfer your information, including personal information of natural persons, outside your jurisdiction of residence or outside the European Union. The jurisdictions where the personal information is transferred may not have data-protection and privacy laws as comprehensive as the European Union. If European Union data-protection and privacy laws apply to you, then VAS will maintain measures to protect your personal information identifying natural persons in a manner commiserate with those protections required under European Union law.

Links Outside VAS: VAS's website, services, and software might provide links to third-party sites. Third parties may also link to VAS's website, services, and software. VAS does not make any representations about the privacy policies or content of third-party sites. VAS is not responsible or liable for any third-party policies, acts, or omissions.

Updates: This policy may be updated from time to time. VAS recommends that you regularly return to VAS's website to stay up to date regarding VAS's Privacy Policy. Any updates are effective immediately upon them being published or otherwise made available on VAS's website. If you expressly accept this Privacy Policy as part of any End User Subscription Agreement or End User License Agreement, then any update to this Privacy Policy will be presented to you for acceptance. If you do not accept the update, VAS can—in its sole discretion—choose to either continue to provide services under the previously accepted Privacy Policy or to terminate services and any accompanying End User Subscription Agreement or End User License Agreement.

Personal Data: To the greatest extent possible, VAS does not keep or process the personal data of natural persons, except for the purpose of identifying authorized users, providing customer service, customer sales, and product development. Any information of this kind is only shared with VAS employees and vendors for customer service, product development, customer sales, and verification purposes.

Additional Rights Regarding Personal Data: The following notices and disclosures apply to all natural persons who provide personal data to VAS, i.e., data subjects, who are covered by the EU General Data Protection Regulation (Regulation EU 2016/679):

- **Length of Data Use:** Personal data of a data subject is maintained while the data subject or the data subject's employer is a customer of VAS, and for a reasonable time afterwards to make it easier for VAS to serve the data subject or his or her employer if either re-subscribe to VAS's services and to contact them about subscription renewal.
- **Right to Access and Rectification:** A data subject has the right to demand access to and the rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability.
- **Withdrawal of Consent:** A data subject also has the right to withdraw the consent provided by his or her acceptance of this Privacy Policy at any time, without affecting the lawfulness of any data processing based on consent before its withdrawal.
- **Right to Lodge Complaint:** A data subject also has the right to lodge a complaint with a supervisory authority regarding VAS's processing of his or her personal data.
- **Need for Personal Data & Consequences of Withdrawing Consent:** The personal data provided by the data subject under this Privacy Policy is required for VAS to perform its obligations under any contract between VAS and the data subject or an employer of the data subject because this information is needed to identify authorized users and provide customer service. A data subject that no longer provides consent or requests erasure of his or her personal data will no longer be able to use VAS services or products because this information is needed to ensure that the data subject is an authorized user.
- **Providing Personal Data to Data Subject:** VAS can provide to a data subject—upon request—remote access to a secure system that provides that natural person with direct access to his or her personal data. This type of request will not be fulfilled in way that may adversely affect the rights or freedoms of others, including trade secrets or intellectual property, and, in particular, the copyrights, protecting VAS's software. Depending on the amount of data that falls within this type of request, VAS may request that, before the information is delivered, the data subject specify the information or processing activities to which his or her request relates.
- **Who to Contact:** A data subject can use the following email to contact VAS regarding any of the privacy rights provided for or granted under law or under this Privacy Policy: legal@vas.com.