BINSENTRY

Data Use and Privacy Policy
(REVISION 1.3)

At BinSentry, our highest priority is customer satisfaction and we believe a critical aspect of earning our Customer's trust is providing our Customers with an earnest assurance that we do everything in our power to ensure that their data is safe and secure. BinSentry strives to achieve the highest level of transparency with regards to the disclosure of information concerning what data we collect and how we use it to deliver the services we offer. The following policy outlines the methods and best-practices that BinSentry employs to collect, store, protect and provide access to the data - this is our commitment to making sure, You, the Customer are confident in our commitment to safeguarding your valuable data.

Please read our Terms and Conditions in addition to this Data Use Policy to ensure that you fully understand the agreements being made by using our Hardware, Software and Services.

Sections
i.   What Information is Created or Collected?
ii.   Who Owns the Data?
iii.   How We Use Your Data.
iv.   Retaining and Storing Your Data.
v.   Protecting Your Privacy
vi.   Third Party Data Use
vii.   Website
viii.   SMS Notifications
viiii. Contact Us

i. What Information is Created or Collected?

a) Basic Information about Customers
BinSentry's primary Customers are Feed Mills ("Mill") with a sub-group of Users referred to as Farms ("Farm"). For the purpose of displaying and organizing data into meaningful organizations, BinSentry may collect and store the following information, provided by the Mill with the permission of the Farm:

- Name of Farm
- Location of Farm
- Name of servicing Mill
- Location of servicing Mill
- Organization to which device is assigned
- Email addresses of Users who wish to receive notifications or use our website
- Telephone numbers of Users who wish to receive SMS notifications

b) Basic Information Regarding Install Locations and Feed Bins

In order to associate collected feed bin data to a particular Customer in a meaningful way, BinSentry collects and stores the following information provided about Farm locations where our sensor is being installed by the Mill, with the permission of the Farm:

- Geographical location of site of feed bin installation
- Account number of feed bin
- Feed bin information (eg. shape, dimensions, capacity, number of rings)
- Organization to which BinSentry Sensor is assigned
- Product code of feed delivered to feed bin
- Bulk Density of product in feed bin.
- Make and Model of feed bin.

c) Feed Bin Level Data

The BinSentry Sensor generates data at a frequency of every 4 hours. Original data that is harvested from on-Farm BinSentry Sensors, consists of the following information:

- Distance to surface of product

d) Basic Sensor Diagnostics Information

In order for BinSentry to administer the necessary provisions outlined in the BinSentry Service Level Agreement, BinSentry requires diagnostics data to be delivered by each BinSentry Sensor. This diagnostics data enables BinSentry to assess the health of our sensors and identify issues requiring further attention. Diagnostics data that is generated and collected from Sensors includes the following information:

- Battery level
- Solar charging efficiency
- Error codes
- Cellular signal quality
- Sensor signal quality
- Any other future diagnostics data that may be required will be recorded here.

e) Data About How Customers Interact With Our Software and Services

Although, we do not currently do so, BinSentry may collect data about how Customers and their Users interact with our Hardware, Software and Services, in order to improve the services and software that we offer to our Customers.

f) Generation of Aggregate Data

BinSentry may use raw, anonymized data to generate aggregate data in order to provide value added services and data to our Customers and Users regarding trends, predictions, notifications or other information that our Customers may find helpful, insightful or that may otherwise improve our Hardware, Software or Services.

ii. Who Owns the Data?

BinSentry classifies data into 4 distinct categories (noted as a,b,c,d below), each with a unique owner. BinSentry believes that data ownership should give you the right to freely share, download, and delete your Data at any time with the understanding that doing so may hinder or prevent BinSentry or the servicing Mill to meet conditions of the **BinSentry Service Level Agreement** and/or provide ongoing services, which may result in Termination of Service.

a) Farm Generated Data ("Farm Data")
All data generated via the direct measurement of, or interaction with Farm-owned machinery, land or farm related processes. BinSentry collects Farm Data when our sensor measures the product level of feed inside of feed bins.

For the duration of the servicing Mill's contract for use of BinSentry Hardware, Software and Services, the Farm in ownership of the feed bin on which our sensor is installed, remains the owner of that data and may request that data in raw format at any time. Examples of Data included in this category would be, feed bin fill data, feed bin dimensions, feed bin name and any other data parameters relating to the Farm, feed bin or operation thereof. At no time will the ownership of this data be transferred to the servicing Mill, BinSentry or any other party directly or indirectly connected with BinSentry.

Farmers can withdraw permission to use data at any time by providing written notice to their Mill representative, however, withdrawal of data access permissions will result in a stoppage of service for devices associated with that User account or Farm.

b) BinSentry Device Generated Data ("Device Data")
Device Data is data that is generated directly by the observation of internal states and conditions related to the operation of the BinSentry Sensor such as battery level, charging state, etc. BinSentry collects Device Data when a sensor wakes from sleep, performs it's diagnostic routines and transmits this Sensor health data to BinSentry servers.

For the duration of the contract for the provision of BinSentry Hardware, Software and Services, BinSentry remains the owner of Device Data. At no time will the ownership of this data be transferred to the servicing Mill or any other party directly or indirectly connected with BinSentry.

c) User Generated Data ("User Data")
Data collected from Mills, Farms or Users of BinSentry Software. This data is not generated but is instead collected either at time of install, device setup and registration or user registration.

For the duration of the contract for the provision of BinSentry Hardware, Software and Services, Users remain the owner of their User Data and have the right to request or have their data deleted at any time. At no time will the ownership of this data be transferred to the servicing Mill or any other party directly or indirectly connected with BinSentry.

d) Aggregated Data ("Aggregate Data")
Data that is created via BinSentry processing algorithms using data from any of the above 3 categories.

For the duration of the contract for the provision of BinSentry Hardware, Software and Services, BinSentry remains the owner of Aggregate Data. BinSentry will provide any and all aggregate data compiled as part of the BinSentry service, to paying Customers/Mills, their Users and Farmers.

BinSentry retains the right to utilize *anonymized* Aggregate Data for marketing, research or product development purposes. We may at any time provide this anonymized data to Third Parties for research purposes or consultation.

ii. How We Use Your Data.

a) Farm Generated Data
BinSentry uses Farm Data to:
- Determine product level, volume and weight, in feed bins
- Associate BinSentry devices with actual feed bins
- Determine locations of feed bins for vehicle routing, install and service purposes

b) BinSentry Device Generated Data
BinSentry uses Device Data to:
- Verify the health and proper operation of Devices
- Identify faulty devices and dispatch Service Technicians
- Ascertain the quality and accuracy of Data being delivered from the Sensor
- Adequately perform Installation of and Service to Sensors

c) User Generated Data
BinSentry uses User data to:
- Provide secure access to Software and Services offered by BinSentry
- Create Bin and Device profiles linked to Users
- Create a Website account so you may access the BinSentry User Interface and interact with the different categories of Data
- Provide general location based services to Users
- Notify users of events to which they have subscribed

d) Aggregated Data
BinSentry uses Aggregate Data to:
- Develop, supplement or improve BinSentry Software and Services.
- Offer insight to Mills and Users about trends, patterns or events that may be worthy of interest.
- Perform research or provide learning data to better understand animal feed consumption
- Perform analysis on the efficacy of the Software and Services being offered
- Market the BinSentry solution

iv. Retaining and Storing Your Data.

BinSentry takes full responsibility for the protection, confidentiality and integrity of your personal information and data. We are committed to managing your personal information and data in accordance with applicable laws and industry standards. We are continually working to improve security procedures to protect your personal information and data against loss, theft, unauthorized disclosure and use, modification or duplication.

a) Data Retention Period
User Data: User Data pertaining to a User of BinSentry Services will be retained as long as the User remains a direct customer of BinSentry or a participating User of one of BinSentry's Customers. BinSentry will delete User Data within 90 days of one of these conditions becoming untrue.

Device Data: Device Data will be retained indefinitely, for analysis and product improvement purposes.

Farm data: Farm Data is retained for up to 24 months to recover from data loss and identify trends.

Aggregate Data: Aggregate Data is retained indefinitely, for research, marketing and product improvement purposes.

b) Data Storage Methods and Location
BinSentry Data is stored in one or more of the following services offered by Amazon Web Services: AWS S3, AWS dynamodb. Unless otherwise stated, all BinSentry data is currently stored in the United States of America.

"Data at Rest" is encrypted using AWS Key Management Services (KMS) which utilizes Hardware Security Modules (HSM) a tamper resistant Hardware Device built explicitly to secure and protect data (**https://aws.amazon.com/kms/**).

BinSentry Hardware and Services utilize SSL encryption to protect **"Data in Motion"** between Clients and Servers.

c) Data Protection Measures

BinSentry makes every effort to meet and exceed industry Best Practices. By implementing the most current revisions of cryptographic encryption protocols we ensure that our data remains protected from the moment it leaves the Farm to when it arrives in your web browser. Wherever possible, redundancies have been built into the our systems to ensure that your data remains safe and well protected throughout the period that you have entrusted it to us. We commit to notify Users as soon as we are made aware of data compromise or breach of security and will do everything in our power to expediently rectify such situations, should they arise.

v. Protecting Your Privacy

BinSentry is committed to protecting your personal information. We manage your personal information in accordance with the Canadian **Personal Information Protection and Electronic Documents Act (PIPEDA)** and the Canadian **Privacy Act**.

This Data Use Policy applies to all BinSentry employees, people or companies providing services to BinSentry that affect the collection of, access to, use or disclosure of customer and/or employee personal information must also conduct themselves in a manner consistent with this policy.

vi. Third Party Data Use

BinSentry is accountable to keep all personal information accurate, confidential and secure, both within the corporation and when business activities (such as security consultation, security audits, other contracted labour or services, etc.) are performed by a third party on behalf of BinSentry. BinSentry's expectation is that all Third Parties will be subject to the same policies that BinSentry adheres to.

- We remain accountable for the use of personal information of our employees, customers and Third Party partners.
- Upon collecting personal information and data we will identify the purposes for which it is being collected and enforce these policies with Third Parties.

- BinSentry authorized Third Parties will use data only for the purposes for which it was intended.
- Should Third Parties require the use of Farm Data or User Data BinSentry will request authorization from the Farms and or Users in question.
- Individuals may withdraw at any time.
- Should BinSentry require use of data or personal information for additional purposes, further consent will be requested prior to use.
- BinSentry will allow individual Farms and Users access to their data and to receive disclosure on the use of their personal information or data, upon request.

vii. Website

GPS coordinates are stored and referenced to locate feed bins only. Our Hardware, Software and Services utilize various wireless networks and require internet connectivity to function.

viii. SMS Notifications

Some end users of our product will be able to register their phone number to receive notifications about events in their operations.

When end-users register their phone number in our web application to receive SMS notifications, we will not send these users marketing messages or share this information with those who will.

Phone numbers will be sent to AWS services only as necessary to deliver the SMS notifications.

End-users may remove their phone number at any time in our web application.

viiii. Contact Us

If you have any questions, inquiries or concerns regarding our privacy policies or procedures please contact us at:

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