

Project Boundary Rider

An innovative biosecurity initiative of Vinehealth Australia

Privacy Policy

Vinehealth Australia understands and respects the privacy of our participants¹ in the *Project Boundary Rider* pilot program, a program which aims to assess the capability of geofencing technology for biosecurity management for the Australian wine industry. We recognise the importance of protecting information collected from our participants and have adopted this privacy policy to inform participants about how Vinehealth Australia and our technology partner will gather, store and use information derived from your participation in the pilot from November 2016 to mid-2017. This pilot program is being operated under a legal agreement between Vinehealth Australia and their technology partner. Both parties respect the privacy rights of all the contributors to the pilot and understand that all information collected and shared between the two aforementioned parties and all contributors to the pilot is subject to this privacy policy and agreed confidentiality constraints.

Scope — this policy applies to:

- a) use of the *B Rider App* (Application)
- b) Canadian-based technology partner's content management system (website) that houses the data records created via the use of the App
- c) services provided to participants by Vinehealth Australia and their technology partner for the duration of the pilot

This policy is current as of its last revision date.

Collection of personal information — by using *B Rider App* and the technology partner's website, participants agree that personally identifiable information² will be collected to facilitate evaluation of the track and trace capability of this technology. Other forms of information that may be collected include aggregate information³ and individual information⁴.

Vinehealth Australia will not knowingly collect personally identifiable information from a child. Vinehealth Australia recommends that children do not register to use *B Rider App*, however download of this App by children is out of Vinehealth Australia's control.

¹ "Participants" refer to all users engaging in use of geofencing technology as part of the pilot

² "Personally identifiable information" is information that can be used to uniquely identify you as a user (name, email address, phone number). Collection of personally identifiable information is undertaken via the registration process for access to *B Rider App*.

³ "Aggregate information" is information that describes the habits, usage patterns and demographics of users as a group, but does not describe or reveal the identity of any particular user.

⁴ "Individual information" is information about a user or user's machine that personally identifies, e.g. is presented in a form distinguishable from information relating to other users.

Disclosure (sharing) — No types of information collected from an individual participating vineyard as part of the pilot will be shared with other parties outside Vinehealth Australia and our technology partner (including for promotional and news purposes), or other individual participating vineyards. Only aggregate information will be shared between participating vineyards during pre-implementation and post-implementation meetings, unless express permission is gained from individual participants, or unless required by law. Some personally identifiable information from participants may be required to be used for simulation and or reporting purposes at the conclusion of the pilot. Vinehealth Australia will seek prior authorisation from individual participants should this be deemed necessary.

Information security — Personally identifiable information provided through use of *B Rider App* and the technology partner's website is collected and processed in Canada by the technology partner and stored in the cloud on a server in Australia. The technology partner has taken reasonable steps to protect the information participants share, including, but not limited to, setup of processes, equipment and software to avoid unauthorised access or disclosure of this information. The technology partner complies with the Safe Harbor framework developed by the U.S. Department of Commerce and the European Union relating to the transfer and processing of personally identifiable information.

Vinehealth Australia and their technology partner are the only system administrators for the pilot. Each participating vineyard only has access to the data records from their own vineyard. All data collected as part of the pilot will be deleted within 3 months post the conclusion of the data-collecting phase of the pilot, or upon a date of request by Vinehealth Australia to their technology partner, unless otherwise agreed for specific purposes/conditions for which Vinehealth Australia has sought written consent from participating vineyards.

The technology partner may employ the use of Cookies on their website. Cookies are small text files that a website you visit asks your browser to store on your computer or mobile device. The purpose of these cookies may include to customise your use of the technology partner's website or to keep records of your access to the technology partner's website. The cookies the technology partner may send to your computer cannot read your hard drive or command your computer to perform any action. As a user, you have the ability to modify your cookie settings, but please note that if you set your browser or mobile device to disable cookies, certain services we provide you may not function properly.

The technology partner's website uses Secure Sockets Layer (SSL) for security to obtain confidential information. This is a protocol for transmitting private documents via the Internet and allows encrypted data to be shared between the browser and the server.

Use of *B Rider App* by You will store information on your mobile including a unique authorisation code that you either enter or download automatically during product registration to identify you as a valid user.

B Rider App can and will only track movement of your mobile device across a geofence. No tracking of a mobile device using this App can or will occur once the mobile device is inside or outside a pre-determined geofence, for example once a mobile device user is inside a vineyard block or beyond the property boundary.

Rights and choices — If you are concerned about the accuracy of the personally identifiable information maintained by Vinehealth Australia or its technology partner or wish to review, access, amend, correct, deactivate or remove it, please contact Technical Manager of Vinehealth Australia, Suzanne McLoughlin, via email at suzanne@vinehealth.com.au. Requests may be declined that jeopardise the privacy of others, require disproportionate technical effort or are extremely impractical.

How to make a complaint — If you have any questions about this privacy policy or the privacy practices of Vinehealth Australia or its technology partner relating to this pilot program, please contact Program Manager, Suzanne McLoughlin, via email at suzanne@vinehealth.com.au. If you are not satisfied with the outcome and wish to make a complaint, please contact CEO of Vinehealth Australia, Inca Pearce, via email at inca@vinehealth.com.au.