Farm Data Code

Summary Audit Report for National Location Registry (NLR)

Provider: GS1 Australia Limited

Assessed against Farm Data Code version: 2.0

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Transparency
✅ 1.1 ✅ 1.2 ✅ 1.3 ✅ 1.4 ✅ 1.5 ✅ 1.6

Fairness
✅ 2.1 ✅ 2.2

Control
✅ 3.1 ✅ 3.2 ✅ 3.3 ✅ 3.4 ✅ 3.5

Portability
✅ 4.1 ✅ 4.2 ✅ 4.3 ✅ 4.4 ✅ 4.5 ✅ 4.6

Security
✅ 5.1 ✅ 5.2 ✅ 5.3 ✅ 5.4 ✅ 5.5

Compliance
✅ 6.1 ✅ 6.2

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Summary of terms

What Farm Data, or other data about the farmer or farm business is being collected, created, aggregated, used, or shared?	Global Location Number (GLN) which is one of the GS1 Keys that is used to identify a location entity. The National Location Registry (NLR) stores the GLN key along with location attribute data (location name, address, contact (optional), geo coordinates, and more) for a given location. Personal information about the farmer is kept in a separate Customer Relationship Management System.
Why is this being done?	Sharing GLN (location information) and attributes with any recipient of the portal to provide access to location data supports improved freight pick-up and delivery processes
Who is the Provider sharing Farm Data with?	GLN information is shared with any Recipient that has access to the NLR portal and has been given permission by the location owner
Is Farm Data being de-identified?	We don't de-identify Farm Data. We have a feature in the NLR to also make a record Restricted or Internal view only
How long is Farm Data stored for?	GLN information (any data linked to it e.g. contact information) is held in the system indefinitely unless a User requests for their data to be deleted.
How can farmers obtain a copy of their Farm Data?	Users can download their data to an Excel spreadsheet at any time, creating a point in time reference. Users that have capabilities may also integrate with the API to pull information down into their own systems.
How can farmers get Farm Data deleted?	Users are able to send a request to our support team to permanently delete GLN information from the NLR
In which countries is Farm Data stored or made available?	Australia
What's in it for the farmer, and for the Provider?	The NLR is managed by GS1 Australia with support from the Department of Infrastructure, Transport, Regional Development, Communications & the Arts and the Department of Health & Aged Care. It is based on GS1 global data standards to support interoperability across the supply chain
Are there any risks or detriments that may affect farmers?	None

Detailed compliance report against Farm Data Code

Transparency

Transparent, clear and honest collection, use and sharing of Farm Data. Providers will:

| Data Code Principles | ✓ 1.1 | ✓ 1.2 | ✓ 1.3 | ✓ 1.4 | ✓ 1.5 | ✓ 1.6 |

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Detailed compliance report against Farm Data Code

Transparency

1.1

Provide Farmers with plain-English, easily found terms and associated policies for data collection, use, and sharing detailing:

- **the identity of the contracting party/ies;**
- **what Farm Data and any other data about the Farmer or their farm/business, will be collected, created, aggregated, used, or shared;**
- **purpose/s for which Farm Data is being collected, used and shared;**
- **the value being created for the Farmer, and the Provider;**
- **how Farm Data will be managed and shared, in terms of security, access, and de-identification protocols;**
- **identity and/or nature of any other entities with whom it shares Farm Data;**
- **processes and conditions for data retention, data retrieval, and service termination; and,**
- **any risks or detriments that may adversely affect Farmers who share data with the Provider.**

Meets the code? ✅ Yes

Provider's comment

Users of the NLR will need to sign and agree to the GS1 Australia National Location Registry Terms & Conditions. We also provide easy access to the GS1 Terms of Trade and GS1 Privacy Policy.

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Detailed compliance report against Farm Data Code

Transparency

1.2

Obtain clear, fully informed, and express consent from the Farmer as to the terms for collection, use, and sharing of Farm Data.

Meets the code? ✓ Yes

Provider's comment

During the registration process users are required to provide consent and acceptance of the terms of the National Location Registry is obtained. Registration and the accepted T & Cs, including the date of commencement is stored electronically in enterprise grade CRM. Further, each time a user logs in, they are required to accept the T&C's. Consent is never verbal.

Detailed compliance report against Farm Data Code

Transparency

1.3

Provide prompt notice about any material changes to the terms and associated policies for collection, use, and sharing of Farm Data.

Meets the code? ✅ Yes

Provider's comment

Changes are communicated in advance of effective dates. Electronic Direct Marketing (EDM) process with timings differ for each scenario but each EDM is tracked when notifications are sent out to the community.

Detailed compliance report against Farm Data Code

Transparency

1.4

Where a material change to terms and associated policies is proposed, obtain clear, fully informed, and express consent for the Farmer to accept the change and; provide an avenue for the Farmer to terminate the agreement without incurring a financial penalty and with adequate time to port or delete their Identifying Farm Data.

Meets the code? ✅ Yes

Provider's comment

The NLR service can be terminated at any time with data being available for download into XLS for the user to keep.

Deletion of data can be done through the backend of the system when requested.

Users should contact the support team to request account closure and data deletion.

Accounts and data are never deleted unless deletion requested by user, in the event the user wants their account reinstated.

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Transparency

1.5

Provide a mechanism for Farmers to enquire about the collection, use, storage, security and sharing of Farm Data.

Meets the code? ✔ Yes

Provider's comment

GS1 NLR Support (Phone/Livechat) is enabled during business hours to support any enquiries.

Detailed compliance report against Farm Data Code

Transparency

1.6

Notify Farmers of the legal jurisdiction in which Farm Data is stored or made available.

Meets the code? ✓ Yes

Provider's comment

The farm data is only made available within Australia to users with appropriate permission access. All NLR data is stored and backed up within Azure which is an Australian Data centre.

Detailed compliance report against Farm Data Code

Fairness

Fair and equitable use of Farm Data. Providers will:

| Data Code Principles | ✓ 2.1 | ✓ 2.2 |

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Detailed compliance report against Farm Data Code

Fairness

2.1

Ensure that Farmers get value from the use of Farm Data – including products and insights derived from it.

Meets the code? ✅ Yes

Provider's comment

Currently the NLR supports features such as Location data Hierarchy view/map display, Search and download capability for all Global Location Number data in the NLR and integration with existing systems and processes.
Users can then create their own reporting via XLS. Sharing GLN (location information) and attributes with any recipient of the portal to provide access to location data supports improved freight pick-up and delivery processes. (To harmonise and align a National data set and standard for property identification, freight and logistics location data and to create a national harmonised approach to plant property location identification.)

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Fairness

2.2

Ensure that Farm Data is not used to the detriment of Farmers without their clear, fully informed, and express consent.

Meets the code? ✓ Yes

Provider's comment

Farm data can only be controlled by users with visibility. Only unrestricted data is visible to all other users and requires the farmer to grant access.

Detailed compliance report against Farm Data Code

Farmer Control

Ability to control and access Farm Data.
Providers will:

| Data Code Principles | ✓ 3.1 | ✓ 3.2 | ✓ 3.3 | ✓ 3.4 | ✓ 3.5 |

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Detailed compliance report against Farm Data Code

Farmer Control

3.1

Ensure the Farmer has control over who can access and use their Identifying Farm Data.

Meets the code? ✅ Yes

Provider's comment

Sharing of farm data is controlled by the user within the NLR. Users need a login and authentication process to access and manage data permissions. NRL data can be controlled with visibility settings such as Unrestricted, Restricted or for Internal access only.

To access data in NLR, a company needs to be a subscribed member, which means they are bound by current T&C's Commercial Suppliers (clause 4.8) will be given access under the same conditions as staff and will be contractually bound to adhere to same data management practices as described in this application.
Escrow companies and auditors may access the data as required by regulations/law applying to GS1 (see clause 3.4)

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Farmer Control

3.2

Take all reasonable steps to ensure any other entities permitted access to Farm Data are bound by the terms agreed between the Provider and Farmer, and do not contravene the provisions of this Code. This does not include entities nominated by the Farmer for data sharing purposes. Inform the Farmer where terms have not been fully passed on, or Code isn't complied with.

Meets the code? ✓ Yes

Provider's comment

Users that are subscribed to the NLR service have access to farm data.

Auditors/certifying bodies (clause 3.4) or Commercial Suppliers (clause 4.8) will be given access under the same conditions as staff and will be contractually bound to adhere to same data management practices as described in this application.

Detailed compliance report against Farm Data Code

Farmer Control

3.3

Provide a mechanism for the Farmer to request corrections to Farm Data.

Meets the code? ✓ Yes

Provider's comment

Farmers can manage this correction themselves via NLR User Interface. GS1 NLR Support (Phone/Livechat) is enabled during business hours to support if needed

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Farmer Control

3.4

Ensure Identifying Farm Data and any other data provided by the Farmer to the Provider, is not deleted without the Farmer's authorisation during any agreed or legally required data retention period.

Meets the code? ✓ Yes

Provider's comment

Current practise already in place, we don't delete any data without any authorisation.

Detailed compliance report against Farm Data Code

Farmer Control

3.5

Take all precautions to avoid identification or re-identification of a farm or Farmer from de-identified data, without the Farmer's clear, fully informed, and express consent.

Meets the code? ✅ Yes

Provider's comment

Only location data is shared, which is public information. When farm data Is available, the farmer has ability to control visibility of their data.

If users choose to de-identify their data under clause 4.7, their data will not be de-identified in NLR, but in other GS1 systems will appear without identifying details. The de-identification question is part of the registration process for an active GS1 account.

Detailed compliance report against Farm Data Code

Portability

Ability to obtain and delete Farm Data. During any agreed and legally required data retention period. Providers will:

Data Code Principles ✓ 4.1 ✓ 4.2 ✓ 4.3 ✓ 4.4 ✓ 4.5 ✓ 4.6

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Detailed compliance report against Farm Data Code

Portability

4.1

Provide Farmers and/or their nominees with the ability to obtain all Identifying Farm Data (both raw and/or processed) in a structured and frequently used machine – or human-readable format where technically feasible.

Meets the code? ✓ Yes

Provider's comment

Farm Data can be extracted/ downloaded via User Interface, Structured XLS (Download All), or via API

Detailed compliance report against Farm Data Code

Portability

4.2

Provide documentation to make ported data usable, e.g. Application Programming Interface (API) documentation and data model diagrams.

Meets the code? ✓ Yes

Provider's comment

Support API documentation is already in place (Swagger definitions and instructions). GS1 NLR support is provided via phone/live chat whenever needed during business hours for manual export of data

Detailed compliance report against Farm Data Code

Portability

4.3

At the request of the Farmer, delete or dispose of any Identifying Farm Data, unless prohibited by law or unable to do so.

Meets the code? ✅ Yes

Provider's comment

GS1 NLR support is provided via phone/live chat whenever needed during business hours. GS1 has a process is in place to assist with deletion/disposal of farm data .

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Portability

4.4

Ensure that contingency plans exist to give Farmers the option to port and/or delete Identifying Farm Data in the event of insolvency.

Meets the code? ✅ Yes

Provider's comment

Data can be extracted/ downloaded via the User Interface, Structured XLS (Download All) or the API

Detailed compliance report against Farm Data Code

Portability

4.5

Provide the Farmer fair warning in advance of changes to legal jurisdiction, change of control, or sale of the Provider entity, and adequate time for the Farmer to port and/or delete their Identifying Farm Data.

Meets the code? ✔ Yes

Provider's comment

Support API documentation is already in place (Swagger definitions and instructions). GS1 NLR support is provided via phone/live chat whenever needed during business hours for manual export of data

In the event the company changes legal ownership, all members would be notified accordingly

Detailed compliance report against Farm Data Code

Portability

4.6

Ensure that Farmers can port and/or delete Identifying Farm Data in the event of service termination.

Meets the code? ✓ Yes

Provider's comment

Data can be extracted at any time by the user prior to termination via API or Manual Download, and by GS1 Australia, after termination if requested.

Detailed compliance report against Farm Data Code

Security

Keeping Farm Data protected and secure. Providers will:

| Data Code Principles | ✔ 5.1 | ✔ 5.2 | ✔ 5.3 | ✔ 5.4 | ✔ 5.5 |

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Detailed compliance report against Farm Data Code

Security

5.1

Take all reasonable and prudent steps, in line with industry best practice, to ensure Farm Data and any other data provided by the Farmer to the Provider, are protected at all times from unauthorised access, damage or destruction.

Meets the code? ✓ Yes

Provider's comment

Yes, authentication processes are in place for users, and regular security review processes are in place. Dedicated team to manage the end-to-end cycle of NLR as a product service.

Detailed compliance report against Farm Data Code

Security

5.2

Put in specific data management protocols to protect sensitive data about the Farmer or farm, such as personal/financial information.

Meets the code? ✔ Yes

Provider's comment

Company, financial or personal information are managed through enterprise grade CRM.

Data protection process and access already in place.

NLR GLN data, can be managed by the User through visibility.

Secure Authentication protocols are in place ensure security for user access to application and API.

Detailed compliance report against Farm Data Code

Security

5.3

Promptly notify the Farmer of a data breach that has led to unauthorised access to, or damaged or destroyed Farm Data.

Meets the code? ✔ Yes

Provider's comment

GS1 Australia has a defined Data Breach process in place and will be followed in an event of a breach.

Under the Privacy law our obligation to report breach will be when there is a Privacy law or Commercial in Confidence significant impact. However, when a breach occurs in any circumstances where users are affected, they will be notified (all parties concerned, just like our case in 2018 Outlook case).

The breach will also be reported to OAIC as/when required to do so according to law.

Detailed compliance report against Farm Data Code

Security

5.4

Implement a backup and recovery regime that is appropriate for the scale, sensitivity and timeliness of the Farm Data.

Meets the code? ✅ Yes

Provider's comment

We have a retention/rollback policy in place for the NLR service.

Detailed compliance report against Farm Data Code

Security

5.5

Ensure all staff and sub-contractors that work with Farm Data, and/or set terms, policies, and/or processes for Farm Data are trained to comply with the terms of this Code.

Meets the code? ✔ Yes

Provider's comment

GS1 has put in place an e-learning module as part of our GS1 e-academy to train/update staff on the Farm Data Code.

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Compliance

Compliance with privacy and disclosure obligations. Where Providers are required by law to provide information to a third party, they will:

Data Code Principles ✓ 6.1   ✓ 6.2

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Detailed compliance report against Farm Data Code

Compliance

6.1

Avoid disclosing any Identifying Farm Data; or,

Meets the code? ✓ Yes

Provider's comment

Yes we comply with this principle

Detailed compliance report against Farm Data Code

Compliance

6.2

If Identifying Farm Data must be disclosed, where legally permissible the Provider must promptly notify any Farmer whose information will be (or has been – if prior warning is not possible) disclosed.

Meets the code? ✔ Yes

Provider's comment

This is currently covered by NLR Service Terms & Conditions. When a legal disclosure is required, we will approach it in two ways:
1 - individual or small group of registry users, we will target communication via EDM individually, our EDM are connected to our CRM and will have a track record.
2 - affecting entire registry users, we will gain support from the regulatory agency and send out communication using EDM as a joint request/action required

Disclaimer

The "Farm Data Code Provider Summary Audit Report" website (Website) is operated by the National Farmers' Federation Limited (NFF). The Website provides a listing of data and technology products (Products), supplied by different providers (Providers), assessed by NFF for compliance with the NFF Farm Data Code (Code).

What is certification?

Providers who wish for their Products to be assessed and certified for compliance against the Code apply for assessment by NFF. NFF perform a desktop review of certain documents to assess a Product's compliance before publishing the outcome of this assessment on the Website. Where a Product complies completely with the Code it will be certified.

NFF's intention is that the Website provides a quick reference for how Products comply with the Code and provides a summary of how Farm Data is handled by Providers.

Certification and assessment is not advice on the quality of the services provided by a Provider or the Product and the review performed by NFF does not consider or reflect these aspects in any way.

By including the Summary Audit Report or certification of a Product on the Website, NFF is not providing an endorsement of the Product, Provider or any services.

How do members of the farming industry use the Website?

NFF operates the Website to allow members of the public to review Providers' and Products' performance against the Code, as assessed by NFF.

While NFF has taken all reasonable measures to confirm the accuracy of its assessment, it does not warrant that any information published on the Website is accurate, complete, reliable or up to date. We request that Providers ensure the information they provide is correct when they apply for assessment and certification, however rely on Providers to comply with this request.

NFF does not make any representations or give any warranties about the information available on the Website or contained in the Summary Audit Report, or the suitability of any Provider or Product for a particular purpose. To the extent permitted by law, NFF will not be liable for any expenses, losses, damages or costs which might be incurred as a result of the information contained on the Website or in a Summary Audit Report being inaccurate or incomplete in any way and for any reason.

What if the Provider's product was not as expected?

NFF encourages farmers to report to NFF any conduct of a Provider or a Product that does not comply with the Code. However, NFF accepts no liability for any aspect of the interaction between a Provider and user of the Website, including but not limited to fees, payments and refunds, scope of services, performance or delivery of any services or contractual disputes. NFF is not a regulator of the relationship between a Provider and any recipient of the Provider's services.

How is personal information used in a complaint?

If you make a complaint, your personal information will be used by NFF to contact you and obtain additional information from you about the alleged breach of the Code. Your personal information will never be published by NFF or provided to a Provider.

For further information on how NFF collects, uses, discloses and stores personal information, please see our Privacy Policy at https://nff.org.au/programs/australian-farm-data-code/australian-farm-data-code-certification-privacy-policy/
The Privacy Policy also provides for how complaints related to privacy may be raised with and managed by NFF.