Farm Data Code

Summary Audit Report for Eratos platform

Data Code Certified 0008

eratos

Provider: Eratos (Aust) Pty Ltd
Assessed against Farm Data Code version: 2.0

Published Date: 29/07/2024
Expiry Date: 29/09/2025
Audit Number: 0008

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

National Farmers Federation

Summary of terms

What Farm Data, or other data about the farmer or farm business is being collected, created, aggregated, used, or shared?	Personal data, such as your name, address, email, telephone number, date of birth; Credit card information is gathered. Eratos will only ever collect farm data at your request. You can ask us to collect and manage any data that complies with our terms of service
Why is this being done?	Farm Data: Data is collected or made available on request from the data owner, generally to connect the data with a service or provider that will increase the value of the data to the data owner. Other data about the Farmer or their farm/business: to provide Eratos services to the Farmer.
Who is the Provider sharing Farm Data with?	We will only share data to third parties with your express permission
Is Farm Data being de-identified?	Farm Data can be de-identified on request, but is not de-identified by default
How long is Farm Data stored for?	Personal data will be stored for 7 years. Farm data that the data owner uploads or provides access to Eratos will be stored indefinitely until either the data owner denies Eratos access, removes their data, deletes their Eratos account or requests that their data or account is to be deleted.
How can farmers obtain a copy of their Farm Data?	Farmers can email privacy at Eratos for any data enquiries. (privacy@eratos.com)
How can farmers get Farm Data deleted?	Farmers can email privacy at Eratos for any data enquiries. (privacy@eratos.com)
In which countries is Farm Data stored or made available?	Farm data including backups is stored by 3rd party cloud storage providers with data centres in Australia (Sydney), Singapore, the United States (Virginia) and Germany. Data is most often accessed by users and staff in Australia, but could be accessed anywhere.
What's in it for the farmer, and for the Provider?	Farmer: You get access to the powerful and value adding services provided by Eratos Provider: New avenues to value for data owners increases the value of Eratos
Are there any risks or detriments that may affect farmers?	No risks have been identified for the farmer, with Eratos, you're in control of your data

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

National Farmers Federation

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

This information is provided in Eratos' privacy policy and subscription terms, which can be found on the Eratos Website.

4

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

When you create an Eratos account, you must accept the terms and privacy policy, this is where you consent to the terms. Consent is tracked against terms by recording the date when consent was given, as well as the version of the terms that have been accepted.

If you choose to share your data with a third party, according to clause of the subscription terms, you must agree to their terms that they will provide to you. Eratos does not manage 3rd party licence agreements, only the controlled sharing of data once those agreements have been made.

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

Notification of upcoming material changes to terms and internal policies for Farm Data management will be in accordance with our communication policy.

Users will be given notice of the change before Eratos makes the change (solely by using the email address you have provided) and will display a notice on the platform describing the change and asking the user to agree to the change.

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

When our terms or policy has changed, users will be asked to reconfirm that they accept the terms and policy when they log in.

Farmers can either delete their account or write to privacy@eratos.com requesting their account be deleted.

If a user deleted their account through writing, they can exercise their data Retrieval Right. They have 7 days to port or delete their data.

Detailed compliance report against Farm Data Code

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

Farmers can email privacy at Eratos for any data enquiries at (privacy@eratos.com).

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

Data including backups is stored by 3rd party cloud storage providers with data centres Australia (Sydney), Singapore, the United States (Virginia) and Germany. Data is most often accessed by users and staff in Australia, but could be accessed anywhere.

Detailed compliance report against Farm Data Code

Fairness

Fair and equitable use of Farm Data. Providers will:

Data Code Principles ✅ 2.1 ✅ 2.2

National Farmers Federation

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

By sharing data with or through Eratos, Farmers will get access to the services provided through Eratos. It is these services that provide the value to the farmer, but vary depending on the use case.

One example is the AADX. A primary aim of the AADX is to return maximum value to farmers in exchange for them sharing their data. Some value adds could include: Ease of sharing, minimisation of repetitive data entry, contributing to research and benchmarks, the return of farming insights such as emissions calculations or revenue generated by publishing data under a commercial licence etc.

Detailed compliance report against Farm Data Code

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 and personal information is used in accordance with our Privacy Policy and Subscription Terms. Any data provided by the user to the platform will not be used by Eratos or third parties without express permission from the data owner.

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

Parties nominated by the data owner can have access to farm data. Third parties are defined as other users of the platform and could be anyone, and have access to anything IF and only IF they are allowed by the sharing agreement made by the farmer and the third party.

When a farmer chooses to share their data, they can add the third party user to their space, they will then have permission to see all the farmer data in their space. Alternatively, a farmer can add their data into the third party providers space, so that the third party now has access permissions to the data.

A data owner can remove a third party from their space or remove the data from a third parties space using our permissions and governance capabilities.

Detailed compliance report against Farm Data Code

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

Farm data won't be shared with third parties not nominated by the data owner.

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

Data owners can request data corrections by contacting privacy@eratos.com either via email or our website contact button.

Detailed compliance report against Farm Data Code

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

Personal data will be stored for 7 years. Data that a data owner uploads or provides access to Eratos will be stored indefinitely until either the data owner denies Eratos access, removes their data, deletes their Eratos account or requests that their data or account is to be deleted.

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

Eratos doesn't de-identify data without express consent from the data owner.

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

Stored data can be accessed either by using supported Eratos data access methods, or if these methods are not suitable for a user, they can request access by contacting privacy@eratos.com. Eratos can present the data in any form required, such as a csv.

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

Data owners can share and integrate their data through Eratos natively. One option is to provide that service permission to access their space, or to add the data to the service providers space. They can also use dedicated sharing protocols like the AADX. However, if they wish to port their data out of Eratos, data retrieval and api documentation is available at https://docs.eratos.com/ or by contacting privacy@eratos.com.

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

Personal data will be stored for 7 years. Data that a data owner uploads or provides access to Eratos will be stored indefinitely until either the data owner denies Eratos access, removes their data, deletes their Eratos account or requests that their data or account is to be deleted.

They can email privacy@eratos.com to request their data be deleted and disposed of.

Detailed compliance report against Farm Data Code

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 is stored in a secure cloud environment. This ensures data will always be retrievable in the event of insolvency as Eratos does not managed the underlying cloud data infrastructure.

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

Customers will be informed via existing customer communication channels, with fair and adequate notice, according to best practice.

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

If a free trial ends, or a users account is terminated, they will get a notification via regular customer communication channels, ie email.

If this notification is provided by the platform the notification will show up the next time a user logs in. Clause 9 is always in effect and they will have 7 days from when the notification is sent to retrieve or port their data. Once an account has been terminated, personal and uploaded data can be retrieved by contacting Eratos via Email.

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.

NOTE: Assessed based on this provider's answers to security questions based on the Australian Cyber Security Centre guidelines for small and medium businesses.

Meets the code? ✔ Yes

Provider's comment

As part of the activities already undertaken by Eratos in the review and audit of our platform and processes, we have implemented industry best practices and configurations across both our infrastructure and business, in order to protect our customers' data.

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

Eratos manages data from the perspective that all the data stored is sensitive. As such, Eratos assumes all data is sensitive, thus, not requiring a way to determine sensitive data or needing additional methods to handle and secure sensitive data.

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

Eratos will communicate with impacted users as soon as we know a data breach has occurred, via usual user communication channels.

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

Each instance of the databases and storage systems utilized by the Eratos platform have multiple redundancies that are isolated in different availability zones. This mitigates against disasters and incidents affecting data center availability.

Eratos has a validated data restoration procedure as part of our infrastructure reviews.

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

Data security, cybersecurity and farm data code training is a part of our standard onboarding, training and internal practice policies.

Detailed compliance report against Farm Data Code

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

Data security is Eratos' top priority and will endeavor to secure identifying user data.

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

In the event of an upcoming or past disclosure of Identifying Farm Data, the data owner (farmer) will be informed via usual user communication channels.

34

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.

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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.