Farm Data Code

Summary Audit Report for Extrata®

Provider: Department of Primary Industries and Regional Development

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

✓ 5.5 ✓ 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?	Farm Data: Farm Data is encrypted at the point of origin and streamed "as-is" real-time to the Data Service Provider (DSP). The DSP decrypts any data received per their own internal process (which is outside the remit of the Extrata Platform). No Farm Data is stored, aggregated, analysed etc. by the Extrata Platform. Other Data: Personal data used for account creation, metadata, Your Content.
Why is this being done?	Personal Data: Used to know who is operating the user account Metadata: Used to record what encrypted data packets are being shared by the platform on the Farmer's behalf. Used to provide insights on data that is shared by the platform. Farm Data: The Farm data is encrypted to protect the data during transmission between the point of origin (Data Originator) and the destination (Data Service provider). Extrata shares encrypted Farm Data from you to a third party of choice.
Who is the Provider sharing Farm Data with?	The Platform will only share farm data with a trusted third party or Data Service Provider nominated by the Farmer e.g., University or AgTech company.
Is Farm Data being de-identified?	Extrata does not de-identify Farm Data. Farm data is encrypted at the point of origin (i.e., Data Originator); thus Extrata is unable to de-identify the farm-data streamed via the platform.
How long is Farm Data stored for?	N/A - The platform does NOT store any farm data. Farm data is encrypted at point of origin and streamed/passed directly to the Data Service Provider.

Summary of terms (cont.)

How can farmers obtain a copy of their Farm Data?	The platform does NOT store any farm data. Farmer should contact their data collector or Data Service Provider for any copies of their data.
How can farmers get Farm Data deleted?	The platform does NOT store any farm data. Farmer should contact their data collector or Data Service Provider.
In which countries is Farm Data stored or made available?	The platform does NOT store any farm data. Farmer should contact their data collector or Data Service Provider.
What's in it for the farmer, and for the Provider?	The Farmer may engage a range of different Data Service Providers to provide a range of different value propositions. This includes for enhanced decision making, additional income, financial and research insights. DPIRD as the Extrata Platform provider, enables primary producers with the data governance controls to safely share their Farm Data with trusted Data Services Providers.
Are there any risks or detriments that may affect farmers?	N/a

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

Farm Data retention and Farm Data retrieval are not applicable because Extrata does not store Farm Data.

Extrata's Terms and Conditions (T&Cs) document outlines the contractual relationship between Extrata and the user including any other data about the Farmer or their farm/business that will be collected, created, aggregated or used.

Metadata and data about the farmer is securely encrypted, stored on the platform and is not shared.

As part of the platform registration process, new users are required to click a tick box accepting Extrata's T&Cs. All users must accept the T&Cs to use Extrata. Extrata's T&Cs address some of the data sharing principles, while the remainder are covered by the Data Sharing Agreement which is outside of the Extrata platform.

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

Electronic consent for the Terms and Conditions (T&Cs) is gathered. The Farmer must click on the box to agree to the T&Cs.

The T&Cs are easily findable, and version controlled if updated. The digital T&Cs are available on the Extrata product website before registration and viewable inside the platform within the Farmer (Data Originator) and Data Service Providers accounts.

We store and have an audit trail of the user accepting the platform T&Cs as part of the platform registration process.

All Extrata users are notified via email and when they next login of the new versions of the T&Cs.

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

If changes to the Terms and Conditions (T&Cs) are planned, then notice of the change will be provided and the user will be notified when they log into Extrata.

The notice will generally be two weeks ahead of the release of the changes. (In the event of a rapid change to the T&Cs it may not be possible to provide advanced notice.)

All users, including the Farmer, will be notified when they use/login to Extrata when the T&Cs have changed. The user will be provided with a summary of changes and instructed to read the T&Cs. Extrata will also send a notification to the Farmer via the selected contact method advising of the changes and a recommendation to familiarise themselves with the revised T&Cs.

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

If Extrata's Terms and Conditions (T&Cs) change, all platform users will be notified via text message or email when they next login.
On login the Farmer will see the notification of the new T&Cs and are prompted to click ok to accept them. They may then decide to remove themselves from the platform if they so wish. There is no penalty for users to leave the Extrata Platform.

The Terms and Conditions section will contain the new T&Cs document with the date that they came into effect. The historic T&Cs documents will be stored for audit purposes by the Extrata platform administration.
If the user does not agree to the new T&Cs they can email Extrata@dprid.wa.gov.au to notify us of their concerns, or alternatively can initiate the account closure process as outlined in the Extrata FAQs.

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

Yes, in principle. However, we do not store or analyse farm data in Extrata so there is no need to provide such a mechanism. DPIRD can provide limited response and guidance with respect to the sharing of data. For example, Data Bundles. Storage and security of Farm Data are the responsibility of the Data Collectors and Data Service Providers.

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 Extrata Platform does not store farm data. However, the Extrata Platform does ensure that it stores any metadata in the Australian jurisdiction.

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

The Extrata Platform does not store Farm Data.

Extrata provides platform users with insights based on the metadata stored by the platform. This is displayed on the users' Dashboard on the Extrata platform.

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

Extrata does not store Farm Data.

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

Extrata does not store Farm Data.
The platform provides farmers with the data governance capability to allow farmers to control with who they share their data with, and for how long.
This control is enabled through the publishing of data bundles within the Extrata Data Marketplace as either Public or Private.
Data consumers are compelled to request access to a data bundle before any data can be streamed from the source system to a Data Consumers platform.

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

Control of data access is the responsibility of the Data Originator, Data Collectors and Data Service Providers. This is not within the domain of Extrata.

Extrata will only stream Farm Data to an authorised Data Service Provider once the Farmer has approved their participation request. It is the responsibility of the Data Collectors and Data Service Providers to manage data access of any at-rest data within their own platforms.

Extrata does not store any Farm Data whilst in-transit through the Platform.

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

Extrata does not store Farm Data.

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

Extrata does not store Farm Data.

Data Management is the responsibility of Data Collectors and Data Service Providers. This is not within the domain of Extrata.

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

Extrata does not store Farm Data.

Data Privacy is the responsibility of Data Originators, Data Collectors and Data Service Providers. This is not within the domain of Extrata.

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

National Farmers Federation

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

Extrata does not store Farm Data.

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

It is the Data Collector's responsibility to communicate to the Farmer how their Farm Data is stored on the Data Collector's platform.

Extrata requires all Data Collectors to have APIs through which Farm Data can be accessed on behalf of the Farmer.

The Extrata platform itself has a generic Application Program Interface (API) with support documentation. Data Service Providers can use this API to connect through to any authorised data bundles. The API has no visibility of the underlying data structures of the Farm Data that it sends via Extrata to Data Service Providers.

The data bundles reference API end points within the Data Collector's platform at the discretion of the Farmer. Data Service Providers can reference any documentation as made available by the Data Collector.

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

Extrata does not store Farm Data.

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

Extrata does not store Farm Data.

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

Extrata does not store Farm Data. This is the responsibility of the Data Originators and Data Service Providers.

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

Extrata Platform does not store Farm Data. This is the responsibility of the Data Originators and Data Service Providers.

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

Extrata provides its users with insights based on the metadata stored by the platform. This is displayed on the users Dashboard on the Extrata platform. All reasonable steps, in line with industry best practice, are taken to protect this metadata. The data is protected at all times from unauthorised access, damage or destruction.

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

All reasonable steps, in line with industry best practice, are taken to protect user profile data (including Protected Personal Information (PPI)) and transactional metadata, which are encrypted while at rest or in-transit.

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

Data breaches will be restricted to a users' profile and/or metadata within the Extrata Platform. There is no Farm Data exposure as we do not store this data within the platform.

Farmers will be notified as per DPIRD policy and as outlined in Extrata's Terms and Conditions (Section 9.1 g), "users will be notified of security breaches pertaining to personal information or, Your Content, or AgData in transmission, and DPIRD will work to minimise the effect of the breach. DPIRD applies the Australian Privacy Principles (or APPs)."

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

This is the responsibility of Data Collectors and Data Service Providers and falls outside the scope of Extrata as no Farm Data is stored within the platform.

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

DPIRD will provide internal training for staff members within the Extrata team. This training will include, but is not limited to, ensuring staff are familiar with and understand all DPIRD internal policies and standards pertaining to data management, and the Australian Privacy Principles.

Training will also ensure that staff are familiar with all related aspects of the NFF Farm Data Code as it relates to the Extrata platform.

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

Extrata does not store Farm Data. This is the responsibility of the Data Originators and Data Service Providers.

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

Extrata does not store Farm Data. This is the responsibility of the Data Originators and Data Service Providers.

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.