

## **Ag Consulting Group**

### **U.S. CUSTOMER PRIVACY POLICY**

**Last Updated: April 15, 2019**

#### **INTRODUCTION AND SCOPE**

This Privacy Policy ("Policy") reflects the online privacy practices of Cavallo Ag Ventures, Inc., a Delaware corporation doing business as Ag Consulting Group, and its affiliates and subsidiaries ("ACG," "us," "our," and "we"). This Policy generally outlines our principles in collecting, using and safeguarding your information online, as well as the circumstances under which we disclose it.

This Policy applies to information about our individual customers in the United States and applies to all persons who use our Web site, mobile applications, electronic services, platforms, social networking sites, or any of our area-specific Web sites that link to or reference this Policy (collectively, the "Site"), as well as all electronic communications from us.

Please read this Policy carefully and review it from time to time for the latest information about our privacy practices. The most recent version is posted at [www.youracg.net/privacy](http://www.youracg.net/privacy). By using the Site, you accept and agree to the terms of the Policy, including changes or amendments as they are adopted. If you do not agree with our privacy practices, please do not provide us with your personal information or interact with the Site.

#### **INFORMATION WE COLLECT**

We collect information that is personally identifying and non-identifying data when you interact with us and the Site. We generally collect such information to service your account, provide goods or services requested by you, understand the use of our Site and make improvements, and to develop and improve products or services utilizing aggregated data from users, including you.

Personally identifying information is information that specifically identifies you or, when combined with other information we have, can be used to identify you. This includes the following types of information:

Contact Information: your name, address, email address, telephone number, fax number, mobile application user name, social networking user names, and other addresses where you are able to receive communications.

Geographic Information: the geographic location of your mobile device and the boundaries and name of your field.

Other Identifiers: license information, company affiliation, and information that permits physical or online contacting, such as IP address or the unique identifier of your mobile device.

Non-identifying information is information that alone cannot identify you. This includes:

Cookies: information that a web server sends to your browser that stores information about your account, preferences, and use of the Site.

Device Data: information concerning a device that you use to access or interact with the Site, such as browser type, system settings, software platform, and firmware.

## Your Information Management and Do Not Track Disclosures

Our Site does not use Cookies for tracking purposes and does not feature integrated third parties. Consequently, we do not process web browser “do not track” signals. In addition, we will not collect your geo-location information without your express consent. Users of the mobile application will be asked to provide their express consent before installing the mobile application for the first time.

You may manage how your browser and mobile device handle certain Cookies by adjusting the privacy and security settings. You may also manage the sharing of certain Device Data by adjusting the settings on your mobile device.

You may manage the sharing of certain information when you connect with us through social networking platforms or applications. Please refer to the social networking website or application for its privacy policy and instructions on how to adjust permissions and manage interactivity.

You have the option of making changes to your personally identifying information, restricting access to your personally identifying information, or requesting that we delete your account by emailing [info@youracg.com](mailto:info@youracg.com). We may retain and use your personally identifying information as necessary to comply with our legal obligations and maintain a record of your transactions. Aggregated information obtained by ACG as a result of your use of our ACG software platform or services may be maintained consistent with the ACG consulting services agreement or subscription agreement or order under which you and your organization accesses the software platform or services.

## **HOW AND WHY WE COLLECT INFORMATION**

We may obtain information directly from you, from your transactions with us, and from third parties. We obtain information directly from you when we initially set up an account for you and during the course of servicing your account.

We collect information about your transactions with us and the products or services we sell or provide to you in order to process the transactions and evaluate your eligibility for certain types of offers, products or services.

We may gather data on how users navigate our Site in order to continuously improve and develop the Site, our software platform and other products and services.

If you opt-in, we collect geo-location information from mobile devices, and other information, in order to enable the inputting of information directly from the field and to facilitate our services, to continuously improve and develop our products and services, and for our own internal analytical purposes.

## **INFORMATION WE DISCLOSE**

Other than as described herein, we only disclose your information as required by law or with your consent.

We may disclose your information as necessary to service your account, provide electronic resources such as the Site, and ensure Site security. Aggregated information may be shared with other users as necessary to provide certain services. We may share your information with service providers as well as persons or organizations that perform business, professional, administrative or legal functions for us.

Our Site may provide some links to third-party websites that are not owned by ACG. We have no control over the privacy practices of such websites and we assume no responsibility in connection with your use of those websites. We recommend that you check the privacy policy of any website before you provide any personal information.

Our Site utilizes and contains third party information. We have no control over the third party information and we assume no responsibility in connection with your use of third party information available on our Site.

We may disclose your information as required by law, such as in response to a subpoena, search warrant, or other court order; to comply with inquiries from government agencies or other regulators; or for other legal purposes.

### **SAFEGUARDING YOUR INFORMATION**

We maintain physical, electronic, and procedural safeguards against unauthorized access by third parties. These safeguards include restricting access to your personal information to employees and third parties who need it to service your account, provide products or services to you or as expressly described in this Policy. All such employees and third parties are restricted by a non-disclosure agreement or binding legal obligations from disclosing confidential information acquired as a result of their engagement with us. We train such employees to follow procedures to safeguard customer information and we require such third parties to agree to maintain data security safeguards with respect to your personal information.

We use computer hardware and software tools to protect your information. For our mobile application, we undertake annual data security audits. We back up information on our Site and employ firewalls, user authentication systems, and access control mechanisms.

### **CHILDREN'S PRIVACY**

Our Site is designed and intended for adults. We do not intend that any portion of the Site will be accessed or used by children under the age of 18. Such use is strictly prohibited.

### **CONTACT US**

Please contact us if you have any questions about our privacy practices or this Policy. You can reach us online at [info@youracg.com](mailto:info@youracg.com).