

TRONIA DATA USE & PRIVACY POLICY

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1. Introduction

At Tronia Systems Ltd., we value your privacy and the importance of safeguarding your data. This Data Use & Privacy Policy describes our privacy practices for the activities set out below. As per your rights, we inform you how we collect, store, access, and otherwise process information relating to you - our customer - and by extension (where applicable), your customer(s) data. We are committed to protecting your privacy in accordance with the highest level of privacy considerations.

As such, we follow the obligations under:

- Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and the applicable provincial legislations

https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/pipeda_brief/

- Personal Information Protection Act (PIPA) is Alberta's private sector privacy law.

<https://www.alberta.ca/personal-information-protection-act>

Scope

This policy applies to any Tronia Systems Ltd. associated applications (i.e. desktop/web app/mobile app/API) & website.

This Policy does not apply to any third-party applications, websites, products, services or platforms that may be accessed through (non-Tronia) links or integration that we may provide to you. These applications and sites are

owned and operated independently from us and should have their own separate privacy and data collection policies. Any personal data you provide to these partners will be governed by the respective third-party's own privacy policy. We cannot accept liability for the actions or policies of these independent providers, and we are not responsible for the content or privacy practices outside of Tronia.

All active Clients are required to sign an End User License Agreement (EULA) agreeing to the terms of our current software licensing and general use policies. Tronia also maintains a Service Level Commitment (SLC) which outlines our commitments as a software service provider to you.

Processing Activities

This Data Use & Privacy Policy applies when you interact with us by doing any of the following:

- Make use of our application and services as an authorized user
- Contract Tronia or make use of any available integration services we provide
- Visit any of our websites that link to this Privacy Statement
- Receive any communication from us including newsletters, emails, calls, or texts

2. Personal Data We Collect

When using our applications, website, resources, or via any other communications.

This data may include:

- Any information such as name, email, and password(s)
- Mailing Address and phone number
- IP address

We additionally collect the following personal data:

- Location data (GPS)
- Uploaded documents or imagery

If you provide us or our direct service providers with any Personal Data relating to other individuals that you represent (meaning YOUR customers/clients/partners); it is understood that our responsibility lies with our direct customers – meaning the clients with whom we directly do business - and it is therefore our assumption that you have the proper authority to share any information with us and by extension any third party you have approved we work with. Tronia only maintains responsibility to our direct Customers with whom we have a EULA and we acknowledge that data will be handled in accordance with this Data Use & Privacy statement.

If you believe your Personal Data has been provided to us improperly, compromised, or wish to otherwise exercise your rights relating to your personal data, please contact us by using the information set out in the [Contact Us](#) section (8) below.

Device and Usage Data

When you visit a Tronia.com. website or use our application(s) I.e. Grower Central, we may automatically collect and store information about a visit using browser cookies (files which are sent by us to your computer), or similar technology. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help Feature on most browsers will provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie. If you **do not** accept cookies, you may not be able to use some features of our software/services and we recommend that you leave them turned on.

We also process information when you use our services and software products. This information may include:

- Login information
- Device IDs
- IP addresses
- Time stamps
- User IDs
- Authentication records
- Location information
- Individual products you view
- Web terms or searches that led you to the site
- Time zone
- Other general operational data

Data We Collect From Third Parties

We may receive your personal data from third parties such as companies subscribing to Tronia Systems Ltd. services, partners, and other sources. This information is not collected by us, but by a third party, and is subject to the relevant third party's own separate privacy and data collection policies. We do not have any control or input on how your personal data is handled by third parties. As always, you have the right to review and rectify this information. If you have any questions you should first contact the relevant third party for further information about your Personal Data. Where that third party is unresponsive to your rights, you may contact Tronia Systems ([Contact Us](#)) and we will attempt to assist you.

Our websites and services may contain links to other websites, applications and services maintained by third parties. The information practices of such other service providers, or of social media networks that host our branded social media pages are governed by third parties' privacy statements, which you should review to better understand those third parties' privacy practices.

Purpose and Legal Basis for the Processing of Personal Data

We may collect and use personal data to provide, maintain, and develop our products and services and understand how to improve them.

These purposes include, but are not limited to:

- Delivering your product or service
 - To fulfill activity requests
- Building a safe and secure environment
 - To verify or authenticate your identity; and
 - Investigate and prevent security incidents such as breaches, attacks and hacks
- Providing, developing, and improving our products and services
 - Deliver, maintain, debug and improve our products and service
 - Enable you to access Tronia.com accounts
- Provide you with technical and customer support

If we process your personal data to provide a product or service, we do so because it is necessary to perform contractual obligations. All of the above processing is necessary in our legitimate interests to provide the products and services to which you have directly subscribed or accessed; in order to maintain our relationship with our customers, and to protect our business. Consent will be required to initiate any services. New consent will be required if any changes are made to the type of data collected. Within our contract, if you fail to provide consent, some services may not be available to you.

Sharing and Disclosure

We will share your data with third parties only in the ways set out in this Policy or as specifically authorized by you the end user. An example of such data sharing is with third party manufacturer reporting. In such an instance, you would have subscribed and authorized participation in such a service.

We also use internal and partner Analytics Tools to help us understand and improve how our end users may use our applications and websites; and where the review of your data is required to perform those analyses. An example of one such tool is Google Analytics. You can read more about how Google uses Personal Information [here](#):

- <https://www.google.com/intl/en/policies/privacy/>

Google Gmail Policy - User Authentication Data

For users of our Gmail API integration, we will collect and store your authentication token and any credentials required to access your Gmail account through the Gmail API. We do not store your Gmail password.

The information gathered is exclusively used for sending emails via the Gmail API. We do not utilize your email content, email addresses, or any other data for purposes other than delivering the intended service.

We utilize the Gmail API to enable email sending. Our application complies with Google's security and privacy standards as outlined in their API policies. Your email content and account information are processed and transmitted securely via the Gmail API.

Legal Requirement

We may use or disclose your personal data in order to comply with a legal obligation, in connection with a request from a public or government authority, or in connection with court or tribunal proceedings, to prevent loss of life or injury, or to protect our rights or property. Where possible and practical to do so, we will tell you in advance of such disclosure.

Service Providers and Other Third Parties

We may use a third party service provider, independent contractors, agencies, or consultants to deliver and/or help us improve our products and services. Service providers may be within or located outside Canada.

3. Cookie Policy

What are Cookies

A cookie is a small file with information that your browser stores on your device. Information in this file is typically shared with the owner of the site in addition to potential partners and third parties to that business. The collection of this information may be used in the function of the site and/or to improve your experience.

How we Use Cookies

To give you the best experience possible, we use the following types of cookies:

- Strictly Necessary
 - As a web application, we require certain necessary cookies to run our service.
- Preference

- We may use preference cookies to help us remember the way you like to use our service and streamline your experience.
- Some cookies are used to personalize content and present you with a tailored experience. For example; location could be used to give you functionality available within our applications, or offer services in your area.
- Analytics
 - We may collect analytics about the types of people who visit our site and how they use our site to improve our service and products.

4. Retention & Deletion

We will only retain personal data for as long as necessary for the purpose for which that data was collected and to the extent required. When we no longer need personal data, we will remove it from our systems and/or take steps to anonymize it.

5. Your Rights to Personal Data

Depending on your geographical location and citizenship, your rights are subject to local data privacy regulations. These rights in Alberta, Canada may include (but are not limited to):

- **Right to Access (PIPEDA)**

You have the right to request a copy of the personal data we are processing about you.

- **Right to Rectification (PIPEDA)**

You have the right to have incomplete or inaccurate personal data that we process about you rectified.

- **Right to Portability (PIPEDA)**

You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal data which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you or the third party that subscribes to Tronia Systems Ltd. services.

Withdrawing Consent

If you have previously consented to the collecting and processing of personal data, you have the right to withdraw consent at any time, free of charge. If you wish to withdraw your consent, please [Contact Us](#) using the information found at the bottom section (8) of this page. **Please note** - that certain products and services we provide require such data from end users and could become unusable/unavailable to you if consent is withdrawn.

How to Exercise Your Rights

You can make a request to exercise any of these rights in relation to your personal data by sending the request to our Client Support Team by using the contact information below.

For your own privacy and security, at our discretion, we may require you to prove your identity before providing the requested information.

6. Changes

We may modify this Policy at any time. If we make changes to this Policy then we will post an updated version of this Policy on this website. When using our services, you may be asked to review our Data Use & Privacy Policy. In this manner, we may record your acceptance and notify you of any future changes to this policy.

This Data Use & Privacy Policy is subject to terms and conditions of any other agreements or policies between Tronia Systems Ltd and the Client. These agreements or policies include, but are not limited to; the Tronia Systems Ltd. End User License Agreement (EULA) and Tronia Service Level Commitment (SLC).

7. Complaints

If you have a complaint about this Policy or any element of your personal information that we hold, then please [Contact Us](#) using the information provided in section (8) below.

8. Contact Us

To request details about your information, consent status, unsubscribe from our emailing lists, request for your data to be deleted, or wish to inquire about any other aspect pertaining to your data and/or privacy, please [Contact Us](#) at any time:

Tronia Systems Ltd. > Client Support

Email: support@tronia.com

Phone (Toll Free): 1.888.987.6642

Address: 335 Carleton Drive, St. Albert, AB T8N 7L1