



Privacy Policy for EquiTrace 4.4 and later

This App collects six categories of data:

- 1) Name, phone number, email, country and state or county of each user setting up a new farm. This information is processed by EquiTrace Ltd on the basis of legitimate interest, to connect the user with customer support and send them information on using the App. Users can ask for their information to be removed from our systems at any time, by emailing equitrace@equitrace.app. This information is held on HubSpot and is not shared with any other third party, unless specifically authorised by the owner of the account. If authorised by the owner of the account, this information can be sent to specified third party software platforms for billing and accounting purposes or for complying with relevant rules and regulations. Each of these connections has to be individually authorised by the owner of the account, and can be switched off within the App at any time. Once the data has been transferred from EquiTrace to the third party, it is subject to that third parties own privacy and security policies.
- 2) Username and encrypted passwords to allow users to set-up and maintain sharing of data on horses between different people on the same farm or premises. The log-in data is stored to allow you to regain access from a different phone, should your own phone be lost or damaged. This data is only used to authenticate users, is stored securely and is not shared with any third party, unless specifically authorised by the owner of the account. If authorised by the owner of the account, username (but not password) information can be sent to specified third party software platforms for billing and accounting purposes or for complying with relevant rules and regulations. Each of these connections has to be individually authorised by the owner of the account, and can be switched off within the App at any time. Once the data has been transferred from EquiTrace to the third party, it is subject to that third parties own privacy and security policies.
- 3) Data on the identification of horses as entered by the users. This includes microchip number, name, breeding, sex and colour. This information is collected to allow correct identification of horses between users. This data is available to authorised individuals on the farm either via scanning the horse's microchip or through the 'Find Horse' part of the App. The identification information is also available to anyone with direct access to the horse, that performs a scan on its microchip using this App, whether or not they are authorised by the farm. If someone scans a horse using this App and is not an authorised user from the farm, the person holding the subscription for the farm will get an alert (unless the horse has been marked as having left the property, sold or deceased). If authorised by the owner of the account, horse identity information can be sent to specified third party software platforms for billing and accounting purposes or for complying with relevant rules and regulations. Each of these connections has to be individually authorised by the owner of the account, and can be switched off within the App at any time. Once the data has been transferred from EquiTrace to the third party, it is subject to that third parties own privacy and security policies.
- 4) The App records the GPS location of each horse when it is scanned together with the user, time and date. This allows all users on the farm to know the last location of any horse and can help the farm comply with legal requirements to keep movement records. Accurate GPS location data is encrypted on the database and can only be accessed by approved members of the farm. If authorised by the owner of the account, GPS and/or its conversion into an address can be sent to specified third party software platforms for the purpose of complying with relevant rules and regulations. Each of these connections has to be individually authorised by the owner of the account, and can be switched off within the App at any time. The temperature of the horse and its very approximate location is transmitted anonymously to a database, which is used to collect data on the influence of local weather conditions on temperature readings. The researchers with access to this database do not have access to the name of the horse, user or farm and can only see the location of the horse to an accuracy of 4760 square miles (12300 square kilometres).
- 5) User entered notes, treatments and reproduction records on individual horses together with the username of the person giving the treatment or creating the note, date and time. This data is collected to share between authorised individuals on the farm. It is encrypted prior to transmission and storage on the server. Only the encrypted data is accessible to employees of EquiTrace, who cannot decrypt it. The data is not accessible to anyone not authorised by the owner and is not shared with any third party, unless specifically authorised by the owner of the account. If authorised by the owner of the account, this information can be sent to specified third party software platforms for billing and accounting purposes or for complying with relevant rules and regulations. Each of these connections has to be individually authorised by the owner of the account, and can be switched off within the App at any time. Once the data has been transferred from EquiTrace to the third party, it is subject to that third parties own privacy and security policies.



- 6) The serial number of the microchip scanner you used. This information is sent to a different database (hosted on a completely separate server) and cannot be linked to any of the data in categories 1 through 4. This data is used, for the purposes of market research, to calculate how many unique microchip scanners are used with this App. No information regarding any individual person, farm or horse is included with this data.

Bluetooth:

This App uses Bluetooth to transmit data from the microchip scanner to the App. This data consists of the 15 digit microchip number read from the horse's microchip, the serial number of the microchip scanner and, if encoded by the implanted microchip, the temperature of the horse.

The only data sent out via Bluetooth is to establish a connection with the microchip scanner. No user or farm specific data of any nature is sent out from the App via Bluetooth.

Subscriptions:

A subscription is required to allow sharing of data between users on a farm or property. Only one person on the farm will be required to have a subscription, and this person can authorise (and subsequently de-authorise) any other user on the farm from having access to the data. Some data is stored locally on the phone to allow for poor internet connections, so data to which a user previously had access may not be instantaneously removed from their phone when a user is deauthorised.

The control of the farm can be transferred to another (previously authorised) user. If you do this, you will get an alert reminding you to cancel your subscription and the new user will be prompted to subscribe.

If you cancel a subscription or let it lapse, notes on the horse and time and location of the scans will no longer be shared between users on the farm, and you will not have access to this data generated by your authorised users. If you restore your subscription, you will regain access to the data that was created when you were previously subscribed.

Deletion of your data:

User accounts can be deleted by going to "Other Features" – "Delete User"; The subscription holder can delete their farm data by going to "Other Features" – "Delete Farm". You can request that your name, email and phone number is deleted from our database by emailing equitrace@equitrace.app