

Privacy Policy – Open Grains AS

Last updated: 19 February 2026

Open Grains AS ("Open Grains", "we", "us", or "our") is committed to protecting your privacy and ensuring transparency regarding how we collect, use, and safeguard personal data. This Privacy Policy explains how we process personal data when you visit our website, use our digital traceability platform, interact with us as a customer, supplier, partner, or farmer, or otherwise engage with our services.

This Privacy Policy is designed to comply with the EU General Data Protection Regulation (GDPR) and applicable Norwegian data protection laws.

1. Data Controller

The data controller responsible for processing your personal data is:

Open Grains AS

Hagavegen 6

9007 Tromsø

Norway

Email: info@opengrains.com

Website: www.opengrains.com

If Open Grains AS processes personal data on behalf of customers or partners, we may act as a data processor, and those organizations remain the data controllers.

2. What We Do

Open Grains provides a digital traceability, sustainability, and supply-chain transparency platform for agricultural products. Our platform helps map supply chains, document product origins, support compliance with sustainability and regulatory requirements (including the EU Deforestation Regulation), and enable financial inclusion through verified production and delivery records.

Our services may involve collaboration with farmers, cooperatives, suppliers, buyers, logistics providers, and financial institutions.

3. Personal Data We Collect

We may collect and process the following categories of personal data:

3.1 Information you provide directly

This may include:

- Name
- Email address
- Phone number
- Company name
- Job title
- Account login credentials
- Communications with us
- Contract and business relationship information

3.2 Farmer and supply chain data

When working with cooperatives, farmer groups, and suppliers, we may process:

- Farmer name and identification information
- Contact details
- Farm location data (including GPS coordinates)
- Production and delivery records
- Cooperative membership information
- Transaction history
- Training participation records

This data is collected to enable traceability, sustainability reporting, and supply chain transparency.

3.3 Automatically collected information

When you use our website or platform, we may automatically collect:

- IP address
- Device type and browser
- Usage data
- Log data
- Cookies and tracking data

See Section 10 for more information on cookies.

3.4 Sensitive data

We do not intentionally collect sensitive personal data unless required for compliance, certification, or regulatory purposes, and only with appropriate safeguards and legal basis.

4. How We Use Personal Data

We process personal data for the following purposes:

4.1 To provide and operate our platform

- Provide traceability services
- Manage user accounts
- Enable supply chain mapping
- Provide dashboards and analytics

4.2 To manage business relationships

- Communicate with customers, partners, and suppliers
- Manage contracts and agreements
- Provide support and respond to inquiries

4.3 To ensure regulatory and sustainability compliance

- Support compliance with regulatory requirements
- Enable sustainability reporting
- Support certification processes

4.4 To improve our services

- Analyze platform performance
- Improve user experience
- Develop new features

4.5 To ensure security and prevent fraud

- Detect unauthorized access
- Maintain platform security
- Prevent misuse

4.6 To comply with legal obligations

- Maintain records required by law
- Respond to legal requests

5. Legal Basis for Processing

We process personal data based on one or more of the following legal grounds under GDPR:

- Contractual necessity (Article 6(1)(b))
- Legitimate interests (Article 6(1)(f))
- Legal obligations (Article 6(1)(c))
- Consent, where required (Article 6(1)(a))

Our legitimate interests include operating and improving our platform, ensuring traceability and transparency, and supporting sustainable agricultural supply chains.

6. Data Sharing and Disclosure

We may share personal data with:

6.1 Service providers

Including:

- Cloud hosting providers
- IT and infrastructure providers
- Analytics providers
- Certification bodies

These providers process data on our behalf under strict data protection agreements.

6.2 Business partners

Including:

- Cooperatives
- Buyers and suppliers
- Certification bodies
- Financial institutions (where relevant and authorized)

6.3 Legal and regulatory authorities

When required by law or to protect our legal rights.

We do not sell personal data.

7. International Data Transfers

Because we operate globally, personal data may be transferred to and processed in countries outside the European Economic Area (EEA), including countries in Africa where agricultural operations take place.

When transferring data internationally, we ensure appropriate safeguards, including:

- Standard Contractual Clauses (SCCs)
 - Data processing agreements
 - Organizational and technical safeguards
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8. Data Retention

We retain personal data only as long as necessary to:

- Provide our services
- Fulfill contractual obligations
- Comply with legal requirements
- Resolve disputes

When personal data is no longer needed, it is securely deleted or anonymized.

9. Data Security

We implement appropriate technical and organizational measures to protect personal data, including:

- Encryption
- Access controls
- Secure infrastructure
- Authentication mechanisms
- Monitoring and logging

While no system is completely secure, we continuously improve our safeguards.

10. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to:

- Ensure proper functionality
- Improve user experience
- Analyze usage

You may control cookies through your browser settings.

11. Your Rights

Under GDPR, you have the right to:

- Access your personal data
- Correct inaccurate data
- Request deletion
- Restrict processing
- Object to processing
- Request data portability
- Withdraw consent at any time

To exercise your rights, contact us at info@opengrains.com.

You also have the right to lodge a complaint with the Norwegian Data Protection Authority (Datatilsynet).

12. Children's Privacy

Our services are not intended for children under 16. We do not knowingly collect personal data from children.

13. Third-Party Links

Our website may contain links to third-party websites. We are not responsible for their privacy practices.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Updates will be posted on our website with a revised effective date.

15. Contact Us

If you have questions about this Privacy Policy or how we handle personal data, contact us at:

Email: info@opengrains.com

Address: Hagavegen 6, 9007 Tromsø, Norway

This Privacy Policy reflects Open Grains' commitment to transparency, data protection, and responsible digital infrastructure for sustainable agricultural supply chains.