

# California Almond Stewardship Platform (CASP) Online System Data and Privacy Policy

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## Introduction

This Data and Privacy Policy applies to all users of the California Almond Stewardship Platform (CASP) online system, including growers and handlers. The purpose of this policy is to outline how data from the CASP online system is collected, used, stored, shared, and protected.

## Data Collection

The CASP online system collects information about almond farming operations. Data collected includes names, contact information, address, orchard characteristics, and farm management practices. Data is collected during the sign-up process as well as through completion of online self-assessments and decision-support tools (e.g., irrigation calculator, nitrogen calculator).

## Data Usage

Data collected through the online system is used to create and maintain a “User Account” to store user information as well as to generate reports and calculate results for individual growers or handlers. Data may also be used in aggregated and anonymized format for almond industry or handler reporting (see more details in Data Sharing section) and/or improving the functionality and effectiveness of the self-assessment online system. Any personal or identifiable information will not be disclosed to third parties without explicit consent, unless required for the purposes stated in this policy or otherwise required by law.

## Data Storage and Security

All data collected through the CASP online system is stored securely in SureHarvest database systems. All information is transmitted via Secure Socket Layer (SSL) technology to be only accessed by the user or by authorized SureHarvest personnel with special access rights to the system. SureHarvest has implemented robust security measures to protect the data against unauthorized access, alteration, or destruction. These measures include, but are not limited to, encryption, access control, secure servers, guardian backups, vulnerability assessment, and web application protection. SureHarvest uses a third-party audited web hosting solution. Server/backup OS and software issues are resolved by restoring from backup or other procedures, as needed.

Security Measures Summary
<ul style="list-style-type: none"><li>• Use of a third-party audited web hosting solution; server/backup OS and disaster recovery. Hosting service has continuous monitoring, physical and cyber security protocols and offsite secure backups.</li><li>• Secure Socket Layer (SSL) technology</li><li>• Regular web and application vulnerability scans</li><li>• Access limits and strict administrative privileges</li><li>• Security operations center to monitor the system and provides alerts.</li><li>• Logging of key transactional events</li></ul>



## Data Sharing

*Data Sharing with Almond Board of California.* Data that is collected through the online self-assessments or tools may be shared in aggregate, anonymized format with the Almond Board of California. Data sharing has been implemented in a way to ensure that no individual almond

operation can be identified from the shared data. Names, phone numbers, or email addresses entered in the CASP online system may be shared with the Almond Board of California for communications related to CASP. However, contact information is never associated with self-assessment or online tool responses.

*Handler Data Sharing.* CASP data may also be shared between a grower and their handler. Grower data is shared with a handler only after the grower has agreed and selected the option to share through the online system. Grower data is shared in aggregate format and individual orchard self-assessment data is not shared. Growers can stop sharing with their handler on the CASP software platform at any time. Growers that have agreed to share data with their handler may voluntarily choose to share their name, contact details and orchard submission status through the CASP platform, but assessment data will never be linked to individual growers. Once 10 orchards have agreed to share data with a handler, the CASP platform will combine results of submitted assessments and provide access to an anonymized, aggregated report that includes the orchard count and acreage for overall sharing, CASP assessment status, Irrigation Improvement Continuum, SAI Platform Farm Sustainability Assessment performance and Bee Friendly Farming Certification Eligibility status. The system requires at least 10 orchards to be sharing data to provide results to ensure anonymity of the aggregate responses. If the number of shared orchards with submitted assessments drops below 10, the aggregate reporting will no longer be available.

### **Third-Party Services**

The CASP online system may use third-party services or applications for data processing, storage, or analysis. These third-party service providers will be carefully selected, and appropriate agreements and safeguards will be implemented to ensure data protection and confidentiality as per other sections in the data policy.

### **User Rights**

CASP online system users have the right to access their data, request corrections to inaccuracies, and withdraw from CASP at any time. Requests regarding personal data can be submitted to the designated contact provided in the section below.

### **Data Retention**

Data collected through CASP will be retained to fulfill the purposes outlined in this policy, including ongoing analysis and reporting of aggregate, anonymized information, unless otherwise requested by CASP users.

### **Data Breach**

In the unlikely event that there is a breach compromising the confidentiality or security of user information from the CASP online system, users would be promptly notified. Efforts will be taken to notify users with the email address that is associated with their user account.

### **Contact**

If you have any questions about this data policy or our practices, please contact us at [CASP@sureharvest.com](mailto:CASP@sureharvest.com).