

# Website Privacy Policy

## 1. INTRODUCTION

### 1.1 Important information and who we are

Welcome to Velocity Technology Privacy and Data Protection Policy. We are committed to protecting and respecting your privacy and Personal Data in compliance with the United Kingdom General Data Protection Regulation, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and other applicable regulations concerning personal data protection

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data.

The individuals from which we may gather and use data can include any people that the organisation has a relationship with or may need to contact.

### 1.2 Your Data Controller

- Velocity Technology Holdings Ltd . and Velocity Technology Ltd. based in London, 3rd Floor 1 Ashley Road, Altrincham, Cheshire, WA14 2DT, United Kingdom
- Velocity Technology Sp. z o.o. based in Warsaw, Żelazna 51/53 St., 00-841 Warsaw, Poland
- Velocity Technology Inc. based in Wilmington , 1209 Orange Street, Wilmington, 19801, Delaware, United States
- Velocity Technology Australia Pty Ltd based in Melbourne, Level 1, 55 Collins Street, Melbourne VIC 3000, Australia.

Hereinafter also referred to as: “Data controllers” or “Controller”

Please be advised that the above-mentioned entities act as Data Controllers of your personal data. Each of them can be contacted regarding personal data at the addresses indicated above by post or by email: [dpo@velocity.xyz](mailto:dpo@velocity.xyz)

In addition, Velocity Technology Sp. z o.o. has appointed Ms Monika Macura as its Data Protection Officer, who can be contacted at [dpo@velocity.xyz](mailto:dpo@velocity.xyz) regarding the processing of personal data.

## 2. LEGAL BASIS FOR DATA COLLECTION

### 2.1 Types of data / Privacy policy scope

Personal information means details which identify you or could be used to identify you, such as your name and contact details. It may also include information about how you use our websites.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation,

political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We collect the following categories of personal information:

- Information you provide, for example: your name, address, email, contact details, date of birth, ID number, nationality and other data necessary for the provision of services
- **Information about your use of our websites.** For more details please see the “Cookies” section.

## **2.2 The Legal Basis for Collecting That Data**

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

- “Consent”: We process data on this basis only if consent has been given. You always have the right to withdraw your consent.
- “Contractual Obligations”: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.
- “Legal Compliance”: We’re required by law to collect and process certain types of data, such as fraudulent activity or other illegal actions.
- “Legitimate Interest”: We might need to collect certain information from you to be able to meet our legitimate interests - this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that we know where to deliver something to, or your name, so that we have a record of who to contact moving forwards.

## **3. HOW LONG WE RETAIN YOUR DATA**

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## **4. YOUR RIGHTS AND HOW YOU ARE PROTECTED BY US**

### **4.1 Your legal rights**

Under data protection laws, you have rights we need to make you aware of regarding your data.

You have the right to:

- request access to your personal data, rectify it, delete it or restrict its processing, as well as the right to transfer data,
- in cases where the basis for the processing of personal data is the legitimate interest of the Controller – to object at any time to the processing of personal data for reasons related to your particular situation,
- in cases where the basis for the processing of personal data is consent – withdraw your consent at any time without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal,

If you wish to make a request under any of these rights, please contact us (see section 1.2).

We would like to make you aware that your rights do not always apply in all cases, for example we might not be able to delete your data if we need it to fulfil your order or we are required to keep it by law. We also might not be able to provide you with information if it would infringe someone else's rights. We'll always try to help you with your request and will let you know in our correspondence with you how we will be able to meet your request and explain why if we are unable to do so.

#### **4.2. Right to complain to a national data protection regulator/supervisory authority**

If you think we have processed your personal information unfairly or unlawfully, or we have not complied with your rights under GDPR, you have the right to escalate your complaint to a national data protection regulator.

Contact details of national supervisory authorities in countries located in the European Economic Area (European Union + Iceland, Liechtenstein and Norway) are available in the [European Data Protection Board website](#).

Information on complaints to the UK supervisory authority can be found on the website [www.ico.org.uk](http://www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

### **5. SHARING YOUR DATA WITH THIRD PARTIES**

Your personal information may be shared with the companies within Velocity group. Access to your personal data will be granted to the Controller's staff, subcontractors, entities providing services to the Controller (i.e., companies providing IT and technical support services, as well as document archiving and destruction services, cooperating law and tax offices, postal services, couriers, banks, entities conducting courses and training, and other entities providing services to the Controller) who need access to the data in order to perform their duties. These entities will only have access to the data to the extent necessary. The data will also be made available to an occupational health physician.

For the Controller's internal purposes, your data may be made available to other entities within the velocity Technology capital group (see section 1.2.)

Your data may be transferred to state authorities if we are required to do so by law.

### **6. TRANSFER OF DATA TO THIRD COUNTRIES**

The controller may transfer your data to third countries. The transfer of personal data outside the UK and EEA is carried out with the assurance of an adequate level of data protection required by the provisions of the GDPR, primarily by establishing cooperation with entities processing personal data in countries for which a relevant decision of the European Commission has been issued confirming an adequate level of protection, or may be based on standard contractual clauses developed by the European Commission to ensure an adequate level of data protection.

### **7. OTHER INFORMATION ABOUT DATA PROCESSING**

Automated decision-making is the process where a decision is made by using automated means only, with no human involvement. These decisions can be based on factual data, on

digitally created profiles or on inferred data. You have the right not to be subject to decisions made just by automated means (e.g. artificial intelligence) without any human intervention, if these decisions have a legal impact on you, or significantly affect your circumstances, behaviours or choices.

Please note that this right does not prohibit processing where you have explicitly consented to it, or it is lawful because it is authorised by UK or European law, or the processing is necessary for entering into a contract between you and the Controller.

We may also profile personal data, particularly for marketing purposes.

Providing personal data is necessary to establish, develop and implement cooperation. In other cases (including to the extent that you consent to the processing of your personal data), providing personal data is voluntary.

## **8. NOTIFICATION OF CHANGES AND ACCEPTANCE OF POLICY**

If we change this Privacy Policy, we will let you know about the changes by publishing the updated version on our website. We are committed to protecting and respecting your privacy and will continue to do so in any future changes we make to this Privacy Policy.

This Privacy Policy applies to all information we process about you in connection with your relationship with us as a customer or potential customer.

Please write to the Data Protection Officer if you would like to find out more about any matters to do with this Privacy Policy.

## **Cookies**

### **What Are Cookies?**

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. More information about the third-party cookies in operation can be found below, alongside links to their privacy and cookie notices.

We use cookies and other tracking technologies in the following manner:

Session cookie – these are cookies which expire at the end of the browser session;

Persistent cookie – these are cookies which are store on your terminal equipment for longer than one browser session. They allow for your preferences, derived from actions on one or multiple sites, to be remembered.

### **Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.

You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Cookie name	Purpose and content	storage period
_cfuvid	Used by Cloudflare WAF to distinguish individual users who share the same IP address and apply rate limits	
__cf_bm	_This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	

### Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Cookie name	Purpose and content	storage period
_ga_# (x2)	Google - It records a unique identifier that is used to generate statistical data on how the user utilises the website.	
_ga (x2)	_ Google - It records a unique identifier that is used to generate statistical data on how the user utilises the website.	

### Functional Cookies

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

Cookie name	Purpose and content	storage period
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_cfuvid	This cookie is used for purposes of tracking users across sessions to optimize user experience by maintaining session consistency and providing personalized services.	
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## Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

Cookie name	Purpose and content	storage period
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## Links to other websites

If the Website contains links to other websites, we cannot be held responsible for the privacy policies of those websites. We encourage you to read the privacy policies of those websites when you visit them. This privacy policy applies only to the Website.

## 2. Independent changes to cookies

Some browsers allow you to choose how your browser responds to requests from third parties to send cookies to your device. To limit the sending of cookies by your browser, please refer to the following pages, where you will find information on how to avoid cookies being placed:

Mozilla Firefox: <http://support.mozilla.org/pl/kb/blokowanie-ciasteczek>

Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>

Edge: <http://windows.microsoft.com/windows-vista/block-or-allow-cookies>

Opera: <http://help.opera.com/Linux/9.22/pl/cookies.html>

Safari: <http://support.apple.com/kb/ph5042>

Any changes to the Policy will take effect immediately after the revised policy is posted on Website.