



Velotic™ Privacy Policy

Effective Date: August 19, 2026

1. Introduction and Scope

Velotic™ ("Velotic," "we," "us," or "our") respects your privacy and is committed to protecting Personal Information that we collect, use, disclose, and otherwise process in the course of operating our business and providing our products, software, cloud offerings, websites, training, support, and professional services (collectively, the "Services"). This Privacy Policy explains how we collect, use, disclose, retain, and safeguard Personal Information, and describes the choices and rights available to individuals regarding their information.

This Privacy Policy applies when Velotic collects and uses Personal Information for its own business purposes, including through our websites, customer and partner interactions, events, marketing activities, support services, and business operations. When Velotic processes Personal Information on behalf of a customer in providing certain hosted or cloud-based Services, that processing is governed by our agreement with the customer. This Privacy Policy continues to apply to Personal Information that Velotic collects and uses for its own purposes in connection with those Services, such as account, billing, support, and security information.

Velotic's products and services are primarily intended for organizations and business users. If you access a Velotic product or service through your employer, educational institution, or another organization, that organization may control your account, determine the information made available to Velotic, and have certain rights to access or manage information associated with your use of the Services. Questions regarding such processing should be directed to that organization.

Certain products or services may be accompanied by a separate privacy notice. If provided, that notice will describe the processing activities to which it applies.

For information about cookies and similar technologies, including available cookie controls, please see Velotic's separate [Cookie Policy](#).



2. Personal Information We Collect

Velotic may collect Personal Information from you directly, automatically through your use of our Services, from your organization, and from third parties authorized to provide information to us. Depending on the nature of your relationship with Velotic, categories of Personal Information we may collect include:

Contact and Professional Information

- Name, business address, email address, telephone number, and professional contact details.
- Employer, job title, department, and business affiliation.
- Account registration information and authentication credentials.

Commercial and Transaction Information

- Product registrations, license information, orders, subscriptions, billing information, purchase history, and customer support records.
- Information relating to training, certifications, webinars, events, and professional services engagements.

Technical and Usage Information

- IP addresses, browser information, operating system details, device identifiers, network information, and approximate location derived from technical information.
- Log files, diagnostic information, audit records, performance metrics, product telemetry, feature usage data, and system configuration information generated through your use of our products and Services.
- Information regarding support cases, troubleshooting sessions, and service interactions.

Communications and Feedback

- Information you provide when contacting us, participating in surveys, providing feedback, engaging with online forums, attending events, or interacting with our sales, support, or customer success teams.
- Audio, video, screenshots, recordings, and transcripts generated during customer meetings, support sessions, training events, or webinars where permitted by applicable law.



Information We Receive From Third Parties

We may receive Personal Information from distributors, business partners, resellers, service providers, lead generation vendors, publicly available sources, event organizers, and other third parties authorized to share information with us. [This may include company name, individual name, business email address, training or course enrollment and completion records, certifications, and related account information.] We may combine such information with information already maintained by Velotic in order to improve our records, support our business operations, and better tailor our communications and Services.

Information Provided by Organizations

If your organization provides you with access to Velotic products or Services, your organization may provide us with information about you, including your name, role, contact information, account details, and product access permissions. We may also receive usage, configuration, or administrative information associated with organizational deployments of our Services.

Intended Users

Our Services are intended for business and professional users and are not directed to children under 16 years of age. Velotic does not knowingly solicit or collect Personal Information from children under 16. If we learn that we have collected Personal Information from a child under 16, we will take reasonable steps to delete the information in accordance with applicable law.

3. How We Use Your Information

Velotic uses Personal Information for the following business and operational purposes:

Providing and Supporting Services

- Managing accounts, subscriptions, and licenses.
- Fulfilling contractual requirements.
- Administering training programs and certifications, including maintaining enrollment and course-completion records.
- Delivering customer support, maintenance, updates, and professional services.



- Responding to inquiries and requests.

Improving Products and Services

- Evaluating product performance and reliability.
- Monitoring system health and security.
- Conducting analytics and research.
- Developing new products, services, features, and capabilities.
- Understanding how customers and users interact with our Services.

Sales, Marketing, and Events

- Providing information about products, services, events, webinars, and industry developments.
- Managing event registrations and participation.
- Conducting customer satisfaction surveys and market research.
- Tailoring communications based on professional interests and prior interactions with Velotic.

Security, Compliance, and Protection of Rights

- Detecting, investigating, preventing, and responding to fraud, cybersecurity incidents, unauthorized access, misuse, and unlawful activity.
- Protecting the rights, property, and safety of Velotic, our customers, business partners, and users.
- Complying with legal obligations, regulatory requirements, court orders, and government requests.
- Enforcing agreements and protecting intellectual property rights.

Business Operations

- Conducting audits, financial administration, corporate governance activities, insurance management, legal compliance, dispute resolution, and transaction planning involving mergers, acquisitions, divestitures, or reorganizations.
- Managing billing and invoicing for products, Services, training, certifications, and other contractual obligations.



In certain circumstances, to the extent permissible by law, Velotic may aggregate, de-identify, or anonymize information and use such information for research, analytics, benchmarking, product improvement, and other lawful business purposes. Such information is generally not considered Personal Information once it has been appropriately de-identified in compliance with applicable data protection laws.

4. Legal Bases for Processing

Where applicable law requires Velotic to identify a legal basis for processing Personal Information, Velotic relies on one or more of the following bases:

Contract Performance

We process information as necessary to enter into, administer, and perform contracts and provide requested products and Services.

Legitimate Interests

We process information where necessary for our legitimate business interests, including operating and improving our Services, managing customer relationships, maintaining security, conducting analytics, preventing fraud, and supporting our business operations, provided such interests are not overridden by your rights and freedoms.

Consent

Where required by law, we rely on your consent, including for certain marketing communications, non-essential cookies, and similar technologies. You may withdraw consent at any time.

Legal Obligations

We may process information where necessary to comply with applicable laws, regulations, legal processes, and governmental requirements.

Protection of Vital Interests

In limited circumstances, we may process information where necessary to protect the vital interests of an individual or another person.



5. Information Sharing with Third Parties

Velotic does not sell Personal Information for monetary consideration.

We may disclose Personal Information in the following circumstances:

Affiliates and Corporate Group Companies

We may share information with our parent company, subsidiaries, and affiliated entities for purposes consistent with this Privacy Policy and applicable law.

Service Providers

We may disclose information to vendors and service providers that assist us with hosting, infrastructure, security, analytics, marketing, customer support, payment processing, training, and other business functions. These providers perform services on Velotic's behalf and are authorized to process Personal Information only as necessary to perform such services.

Business Partners and Channel Participants

Where appropriate, we may share information with authorized distributors, resellers, implementation partners, and other business partners for the purposes of providing, supporting, offering, or administering products and Services, only as permitted by applicable law.

Organizational Customers

If you use Velotic Services through an organization, administrators for that organization may access, manage, and control certain information relating to your account and use of the Services in accordance with their policies and agreements with Velotic.

Legal and Corporate Transactions

We may disclose Personal Information:

- To comply with legal obligations or lawful governmental requests.
 - To protect rights, property, or safety.
 - In connection with mergers, acquisitions, financing transactions, restructurings, asset sales, or other corporate transactions.
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6. Retention of Personal Information

We retain Personal Information for as long as necessary for the purposes described in this Privacy Policy, including to provide and improve our Services, administer training and certifications, maintain course histories, support customer relationships, fulfill customer and contractual requirements, comply with legal obligations, resolve disputes, maintain security, and enforce our agreements. Retention periods may vary depending on the type of Personal Information, the purposes for which it is used, and applicable legal or contractual requirements. When Personal Information is no longer required for these purposes, we will delete it or anonymize it in accordance with applicable law.

7. How We Protect Your Personal Information

Velotic maintains reasonable administrative, technical, and organizational safeguards designed to protect Personal Information against unauthorized access, use, alteration, disclosure, loss, or destruction. However, no method of transmission or storage is completely secure, and Velotic cannot guarantee complete security.

8. Your Data Subject Rights

Depending on your jurisdiction, you may have certain rights with respect to the Personal Information we hold about you. These rights may include the right to

- Access information we maintain about you.
- Correct inaccurate or incomplete information.
- Request deletion of Personal Information.
- Request portability of your information.
- Restrict or object to certain processing activities.
- Withdraw consent where processing is based on consent.
- Opt out of certain marketing communications by using the unsubscribe mechanism in the communication or contacting legal@velotic.com; this does not apply to service, security, transactional, or relationship communications.
- Opt out of certain targeted advertising or profiling activities where applicable.



- Lodge a complaint with a supervisory authority or privacy regulator.

You may exercise these rights by contacting Velotic at legal@velotic.com, or at the address set forth below.

Where required by law, Velotic will verify your identity before fulfilling privacy requests. We may request additional information necessary to authenticate your request and protect against unauthorized disclosures. If we process Personal Information on behalf of an organizational customer, we may direct privacy requests to the applicable customer where appropriate.

Velotic will respond to requests within a time period required by applicable law. Individuals who are dissatisfied with Velotic's response may have the right to appeal the decision, where provided by applicable law, and may file a complaint with the relevant privacy regulator or supervisory authority.

9. Additional Disclosures for California Residents

This section applies only to California residents and supplements our general Privacy Policy with disclosures required by the California Consumer Privacy Act (CCPA).

Categories of Personal Information Collected and Disclosed In the preceding 12 months, we have collected and disclosed the following categories of Personal Information for business purposes (such as providing Services, security, and marketing) to service providers and the third parties described in Section 5:

- Identifiers: Name, alias, IP address, email, and account credentials.
- Commercial Information: Purchase history and service records.
- Internet Activity: Browsing history and interactions with our websites or ads.
- Financial Information: Billing and payment details.
- Professional/Employment & Education Information: Job title, employer, and training records.
- Geolocation Data: Approximate location derived from technical data.
- Audio/Visual Data: Recordings of support sessions or webinars.
- Inferences: Profiles reflecting preferences or characteristics derived from the above.



Sale and Sharing of Personal Information

- Sale: We do not "sell" Personal Information for monetary consideration.
- Sharing: We may "share" identifiers and internet activity information with third-party advertisers to provide cross-context behavioral advertising. We do not knowingly sell or share the Personal Information of minors under 16.

Your California Privacy Rights If you are a California resident, you have the following rights:

1. Right to Know/Access: Request the specific pieces and categories of Personal Information we have collected about you and how we use/disclose it.
2. Right to Delete: Request the deletion of your Personal Information, subject to certain exceptions.
3. Right to Correct: Request the correction of inaccurate Personal Information.
4. Right to Opt-Out of Sharing: Direct us not to share your information for cross-context behavioral advertising.
5. Right to Non-Discrimination: We will not deny you services or provide a different level of quality for exercising your privacy rights.

Exercising Your Rights To exercise your rights to access, delete, or correct your information, please email legal@velotic.com. To opt-out of the "sharing" of your information for advertising, you may use the cookie controls described in our Cookie Policy or contact us directly. We will verify your identity before fulfilling requests as required by law.

10. International Data Transfers

Velotic is a global organization and may transfer, store, access, or process Personal Information in countries other than the country in which the information was originally collected, including the United States and other jurisdictions where Velotic or its service providers operate.

When required by applicable law, Velotic implements appropriate safeguards to protect Personal Information transferred internationally. Such safeguards may include Standard Contractual Clauses approved by the European Commission, the UK International Data Transfer Addendum, adequacy decisions, contractual commitments, or other lawful transfer mechanisms recognized by applicable data protection laws.



Velotic uses appropriate privacy, confidentiality, and security safeguards for international transfers where required by applicable law and as appropriate to the relationship, including through contractual requirements for relevant service providers or business partners.

11. How to Contact Us

Velotic has designated a Data Protection Officer ("DPO") and established privacy governance procedures to oversee compliance with applicable privacy and data protection laws. Individuals can contact the DPO regarding questions about the processing of Personal Information, the exercise of privacy rights, cross-border data transfers, or concerns regarding Velotic's privacy practices. If you believe that Velotic has not appropriately addressed a privacy concern, you have the right to contact the applicable supervisory authority or data protection regulator in your jurisdiction

If you have questions regarding this Privacy Policy, wish to exercise your privacy rights, or would like to contact Velotic regarding the collection, use, or processing of your Personal Information, please contact:

Global Data Protection Officer

Email: legal@velotic.com

Postal Address:

Velotic

Attn: Global Data Protection Officer

200 Foxborough Blvd

Foxborough, MA 02035 USA

Individuals located in the European Economic Area, the United Kingdom, Switzerland, and other jurisdictions with applicable privacy laws may also contact the Data Protection Officer concerning cross-border transfers, lawful processing, or data subject rights requests. Velotic will investigate and respond to privacy inquiries in accordance with applicable law.

12. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our information practices, Services, or legal requirements. When we do, we will update the Effective Date above and post the revised policy.