

Date Updated: April 27, 2022

## Introduction

Velocity Global is committed to maintaining your trust, ensuring your privacy, and protecting your personal data. We work to process your personal data in a fair, transparent, and lawful way, and this Privacy Policy explains how we collect, use, process, share and protect personal data. It also describes the choices available to you regarding the use of your personal data. As you review this Privacy Policy, keep in mind that some Velocity Global products are subject to separate terms and conditions that include privacy-related terms supplementing this Privacy Policy.

Any personal data you provide when using our [public-facing website](#) (our “Site”), our [cloud-based technology platform](#) (our “Platform”), any other website operated by us, or our products will only be used in accordance with this Privacy Policy. Please read this Privacy Policy carefully to understand our policies regarding your personal data, including your responsibilities for storing, collecting, using, and sharing personal data.

## Data that we collect when you use our Site

Velocity Global may collect and process your personal data to ensure the efficiency and effectiveness of our Site, particularly with regard to the following:

We collect and use personal data to ensure we provide you with informative and timely marketing material:

- When you download an e-book, checklist, or other content from either our Site or a social media profile operated by us, the download is part of a series of information. We use your contact information that you gave us (for example, name, email, phone

number, etc.), along with company information (for example, company name, business title/role), and it is in our legitimate interest to provide you with additional emails and marketing materials pertaining to the downloaded materials so that you have the most accurate and up to date information. If you choose not to continue to receive such information, we make it very easy for you to opt out of these emails.

- If you register for one of our webinars, we may share the personal data you submit during the registration process with the co-presenter(s) of the webinar as stated in the registration form of the webinar.
- We use or retain some personal data based on our legitimate interest in performing internal revenue forecasting and data analytics to enhance our service capabilities.
- To make our Site and our products more useful to you, our servers (which may be hosted by a third-party service provider) collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit to our Site.

You can unsubscribe from marketing communications at any time.

## **Data we collect automatically when you use our Site**

Velocity Global and our service providers automatically collect information about you when you access our Site.

Cookies are small amounts of data that are stored in separate files within your computer's Internet browser. Cookies are accessed and recorded by the websites you visit, and by the companies that show advertisements on these websites, so that they can recognize the same browser. For more information regarding cookies, please see our cookie policy below.

Web beacons (sometimes called transparent GIFs, clear GIFs, or web bugs) are small strings of code that provide a way for us to deliver a small graphic image (usually invisible) on a web

page or in an email. Web beacons can recognize certain types of information on your computer such as cookies, the time and date a page is viewed, and a description of the page where the web beacon is placed.

Google Analytics is a web analysis service provided by Google Inc. (“Google”). We utilize data collected by Google to track and examine the use of our Site and to prepare reports on site usage activities. For more information on Google Analytics, see [here](#). Google AdWords conversion tracking is an analytics service provided by Google that connects data from the Google AdWords advertising network with actions performed on our Site. For more information on Google Ads, see [here](#). For more information on your privacy choices in connection with Google Analytics, including the Google Analytics Browser Opt-Out Add On, please visit the Google website at: [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/).

To make our Site and products more useful to you, our servers (which can be hosted by a third-party service provider) collect information from you, including your browser type, operating system, IP address, domain name, and/or a date/time stamp for your visit.

## Cookie policy

Our Site uses cookies to distinguish you from other users of our Site. Cookies are small text files used as an anonymous unique identifier sent from our Site and stored on your browser or hard drive. This helps provide you with a good experience when you browse our Site, and also allows us to improve our Site and our products.

These identifiers are not what you might think of as personal information, like your name or phone number. However, this sharing of data may be defined as a sale under California law. You have the right to accept or refuse cookies, and to know when a cookie is being sent to your computer. If you choose to refuse cookies, portions of the Site or services may not function as intended.

We use cookies:

- which are essential to make our Site work; and
- to help us improve our Site by giving us insight into how the Site is being used.

We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. You can manage session cookie settings [here](#). Persistent cookies can be removed by following Internet browser help file directions. Your settings are browser and device specific—so, if you come back to our Site from a different device or browser, or you delete cookies on your current browser, you may need to apply these settings again.

By clicking on “Accept” on our Site’s cookie banner, you agree that we can place cookies on your computer or device. If you do not consent, you may continue to use our Site, but the functionality may be decreased. You may withdraw your consent at any time by using your browser settings to delete your cookies and adjusting the settings [here](#).

By accessing or using our Site, you agree to our [Terms of Use](#).

Cookie Settings

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## **Data we collect when you become a customer**

In addition to the above, Velocity Global collects and processes your personal data when you sign on as a customer. For example, to deliver our products and give you access to our Platform, we may process your account owner’s name and contact information, such as name and email address, job title, or phone number, when you use this information to [Contact](#)

Us or to access or use our Platform. We may also use this information to contact you, our Customer, to schedule demonstrations of our products or respond to requests for customer support.

By accessing or using our Site and/or our Platform, you agree to our [Terms of Use](#).

## Data we collect when you become a supported worker

In addition to the above, Velocity Global collects and processes your personal data when you join our supported workforce. This information is stored and processed on our Platform and can be accessed on our Platform by authorized representatives of the Velocity Global customer to which you are providing your services. This information is used to fulfill contractual obligations to our customers and is also frequently necessary for the purposes of carrying out our obligations in the fields of employment and contractor management. The categories of your personal data that we collect and process vary depending on the applicable product and the laws of the country in which you work:

- Contractor Management, Multi-Country Payroll, Contractor Classification, and Global Agent of Record (AoR) products:
  - Contact data (name, address, email address, phone number, etc.);
  - Financial data (bank account/payroll details);
  - If applicable, demographic data necessary to register workers with local labor and tax authorities (like age, gender, marital status, tax ID number, etc.); and
  - Location data (we use built-in browser location settings to collect and report on the country and county/district or state/province where you perform work. You can control this by adjusting the location settings of your web browser).
- Global Employer of Record (EoR) product:
  - All of the above categories of data;

- Medical data necessary to provide health insurance or other related employee benefits;
- If applicable, immigration-related data necessary to sponsor a work visa application or otherwise assist with or manage the immigration process;
- If applicable, trade-union membership; and
- If requested by the customer to which you are providing your services, data related to your educational and/or criminal background collected during the background screening process.

In certain instances, we may use aggregated, de-identified user data to help enhance our Platform, debug or repair issues, or otherwise improve our products. These uses are often compatible with the original purpose for which the personal data was processed. For example, to support diversity, equity, and inclusion initiatives, we aim to provide our customers with anonymized reporting on the demographic makeup of their supported workforce. This information is collected on a voluntary basis during our onboarding process, and except where required by applicable law, we avoid collecting personal data revealing political opinions, religious or philosophical beliefs, genetic data, biometric data, or data concerning sex life or sexual orientation.

By accessing or using our Platform, you agree to our [Terms of Use](#).

## How we collect personal data

Velocity Global often collects and uses personal data that you provide directly to us. This data is collected in various online forms or through your use of our Site and/or our Platform and is collected throughout our business relationship. We are a United States based company, and all data flows back to a centralized infrastructure managed by Velocity Global in the United States. We and our service providers may also receive your personal data from other sources, such as public databases, marketing partners, social media platforms, and other third parties.

Our privacy compliance efforts also involve data protection impact analyses in order to limit the collection of data only to that which is necessary.

## Other ways you provide personal data to us

If you provide us feedback or contact us via email or through our Platform, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply. If you submit a review while using our Platform, we use your email address to validate the legitimacy of your review. Note that your review will remain anonymous and your email address will not be shown publicly in these cases.

We may also collect personal data on pages of our Site that state that personal data is being collected. For example, when you [Contact Us](#), we ask for your name, business email, company name, phone number, and job function. Where we ask for personal data, we distinguish between 'optional' and 'required' fields.

## Third party sharing

### General Sharing

We may share information internally or with third parties for purposes described in this Privacy Policy. Information collected within the European Economic Area (“EEA”) may, for example, be transferred to countries outside of the EEA for the purposes described in this Privacy Policy. We utilize the standard contractual clauses published by the European Commission in June 2021 to ensure there is a legal basis to transfer personal data from the EEA to the United States and other countries. We have also adopted contract language for the United Kingdom, in accordance with British ICO guidance.

### Sub Processors

We transfer personal data to vendors, service providers, and other partners who support our business, such as providing technical infrastructure services, analyzing how our products are used, measuring the effectiveness of our marketing and advertising, providing customer service, facilitating payments, or conducting research and surveys. These partners must adhere to strict confidentiality obligations in a way that is consistent with this Privacy Policy and the agreements we enter into with them. Here are examples of some of the ways we use subprocessors to process your personal data:

- We use Software-as-a-Service (SaaS) and other vendors to help us process personal data.
- We use email hosting services to send and receive business communications.
- We use customer relationship management tools to help with business-related data.
- We use billing and credit card merchant systems to process payments.
- We use ticketing and help systems to support our customers.
- We use vendors in certain instances for payroll support.

Velocity Global does not sell and will not sell personal data or consumer information. We may disclose your personal data to the extent that we are required to do so by applicable law, in connection with any legal proceedings or prospective legal proceedings.

## Security

We are committed to ensuring that your personal data is secure. In order to prevent unauthorized access or disclosure, we have put in place appropriate technical and organizational measures to safeguard and secure the personal data we process. We have certified to and maintain active compliance with industry standards like ISO/IEC 27001:2013. More information about our ISO/IEC 27001:2013 certification can be found [here](#). We also comply with and follow the principles of the EU's General Data Protection Regulation across our business, and strive to process your personal data in a fair, transparent, and lawful way

wherever possible. Where we process personal data from a member of the Asia Pacific Economic Cooperation (“APEC”) economy, we perform such processing in a manner consistent with the [APEC Cross Border Privacy Rules](#) system to the extent applicable. By assessing the impact of data processing and the collection of personal information, we are able to more effectively serve and support our customers and supported workers around the globe.

However, no system is 100% secure and the security of your personal data cannot be guaranteed. You play a part in the protection of your personal information, and so you must ensure you protect your username and password and do not share it with others. If despite all our efforts, a data incident does occur, we will take appropriate countermeasures to limit the damage. In case of a data incident that is likely to result in a high risk of unauthorized access to or disclosure of your personal data, and depending on the circumstances, we will inform you about remedial actions to prevent any further damage. We will also inform the relevant data controller, supervisory authority, or other applicable authorities without undue delay.

## Data retention

We will not store your personal data longer than necessary for the purpose for which we have processed your personal data, including our legal requirements to retain data after completion of the relevant work engagement. How long we retain your personal data depends on the type of data, the purpose for which we process it, and local laws governing the storage of the data.

## Your privacy rights

You have the right to access your personal data, including the specific pieces of data that we collect, the business purpose for collecting or using this data, and the parties with whom we

share this data. You may also request that your personal data be corrected, amended, rectified, restricted, not processed, or deleted, by:

- by clicking on the following link to submit your [Subject Access Request](#); or
- by emailing [privacy@velocityglobal.com](mailto:privacy@velocityglobal.com)

You will not be discriminated against or otherwise penalized for exercising rights in your personal data. Please note that we must retain certain information related to the request itself as part of our legal records. We also retain anonymized information, as much as may be possible, in order to maintain the accuracy of our records for compliance with applicable law or to manage ongoing business requirements like financial reporting.

We require all personal data-related requests to be in writing. We will respond to your request within a reasonable time and in any event within 30 days. We may require additional information from you to allow us to confirm your identity and review your personal data. After we have confirmed your relationship with us and have the proper authorization, we will respond to your request in further detail.

If we receive a request from an individual whose personal data we process on behalf of another party, we will inform the other party of the request, and work with both the third party and the individual to complete the request.

If you believe that any of your personal data we are holding is incorrect, incomplete, or should not be processed, please contact us as soon as possible through the contact methods listed above and we will promptly take the appropriate action. You are responsible for ensuring we have an up-to-date, active, and deliverable email address at which we can contact you, and for periodically visiting our Site and this Privacy Policy to review any changes or updates.

You have the right to withdraw your consent to receive any marketing or sales material from us at any time. To do this, please send an email to [marketing@velocityglobal.com](mailto:marketing@velocityglobal.com).

## **Changes to our privacy policy**

It is our policy to post any changes we make to our Privacy Policy on this page. In some cases, we provide additional notice of changes. If we make material changes to how we treat your personal data, we will notify you by email to the email address specified in your account and/or through a notice on our Site and/or our Platform. The date the Privacy Policy was last revised is listed at the top of this page. The effective date of the current version of this Privacy Policy is April 27, 2022. Velocity Global may change this Privacy Policy from time to time by updating this page.

## **Further information**

If you have any questions about this Privacy Policy or questions or complaints about the processing of your personal data, please contact us at:

Velocity Global Data Protection Officer

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