

VELOCIX SOLUTIONS LIMITED

Website Privacy Notice

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ABOUT US

This website is owned and operated by Velocix Solutions Limited (“**Velocix**”, “**we**”, “**our**” or “**us**”) which is a private limited company registered in England and Wales with company number 11560407. Our registered office is at Unit A1 Methuen Park, Chippenham, England, SN14 0GT. Our company is a wholly owned subsidiary of the Volaris Group Inc. group of companies.

At Velocix, we are committed to respecting your privacy. This Privacy Notice explains how we collect, use and disclose personal information that we receive when you visit the website, use our services and products, or communicate with us both on the website and offline as a business customer, prospective customer or general contact.

We also process personal information as a data processor on behalf of our customers (please see [Velocix as Data Processor](#) below for the further details).

CONTACTING US

If you have any questions about this Privacy Notice or your information, or to exercise any of your rights as described in this notice or under applicable data protection laws, you can contact the Data Security Officer at:

Data Security Officer
Velocix Solutions Limited
Unit A1, Methuen Park
Chippenham, SN14 0GT
United Kingdom

Or by email: privacy@velocix.com

DATA PROTECTION PRINCIPLES

Velocix adheres to the following principles when processing your personal information as data controller:

- 1. Lawfulness, fairness and transparency:** data must be processed lawfully, fairly and in a transparent manner.
- 2. Purpose limitation:** data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 3. Data minimisation:** data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 4. Accuracy:** data must be accurate and, where necessary, kept up to date.
- 5. Storage limitation:** data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed.
- 6. Integrity and confidentiality:** data must be processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

PERSONAL INFORMATION WE COLLECT

Information you give us

You may provide us with information through the website, by email, over the phone or otherwise communicate or be in contact with us as a business customer or business contact, when you:

- request additional information about our services and products or ask us to contact you;
- use our services and products;

- register with us on the website; and
- make any comment or contribution on our website.

The categories of personal information you provide may include:

- first and last name;
- job title and company name;
- email address;
- phone number;
- mailing address;
- password to register with us; and
- any other identifier that permits Velocix to make contact with you.

We do not generally seek to collect sensitive personal information through the website. Sensitive personal information is information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; health or sex life, sexual orientation; genetic or biometric information. If we do collect sensitive personal information, we will ask for your explicit consent to our proposed use of that information at the time of collection.

Information we collect from you

Velocix collects, stores and uses information about your visits to the website and about your computer, tablet, mobile or other device through which you access the website. This includes the following information:

- technical information, including the Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location;
- information about your visits and use of the website, including the full Uniform Resource Locators (URL), clickstream to, through and from our website, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used.

Aggregated Data

We may also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Children

The website is not intended for or directed at children under the age of 16 years and we do not knowingly collect information relating to children under this age.

VELOCIX AS DATA PROCESSOR

We collect and process personal information on behalf of our customers in the provision of our services and products. In these circumstances, Velocix is acting as a data processor and our customers remain the data controller in respect of personal information they provide to us. To the extent that we are acting as data processor, we will process such personal information in accordance with our customer's instructions and any agreement in place with our customers. Velocix will only use such personal information for the purposes of providing the services and products for which our customers have engaged us.

Our customers are responsible for ensuring that these individuals' privacy is respected, including communicating to the individuals in their own privacy notices who their personal information is being shared with and processed by.

As a data processor, Velocix may share personal information where instructed by our customer (the data controller). Where authorised by the customer, we may also share personal information with third party service providers who work for Velocix and who are subject to security and confidentiality obligations.

Where Velocix is acting as a data processor, we will refer any request from an individual for access to personal information which we hold about them to our customer. Velocix will not respond directly to the request.

Velocix will retain personal information which we process on behalf of our customers for as long as needed to provide services and products to our customers and in accordance with any agreement in place with our customers.

We may anonymise and aggregate the personal information we process in such a way as to ensure that individuals cannot be identified from it. We may use this anonymised and aggregated information for our own purposes including for testing our systems, research, data analysis, developing new products and services and improving the website. We may share this anonymised and aggregated information with third parties.

WHAT WE DO WITH YOUR PERSONAL DATA

As a data controller, Velocix will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

Purposes for which we will process the information	Legal Basis for the processing
To carry out our obligations arising from any contracts entered into with you and to provide services and products to you.	It is necessary for us to process your personal information in this way in order to enter into a contract with you and to fulfil our contractual obligations to you.
To provide you with information and materials that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and

	<p>materials requested in order to generate and develop business. To ensure we offer an efficient service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.</p>
<p>To personalise our services and products and the website to you.</p>	<p>It is in our legitimate interests to enhance your experience on our website and to better our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.</p> <p>If you do not wish to receive tailored or personalised information from us based on personal information you have provided us, please contact us as provided in Contacting Us above.</p>
<p>To enforce the terms and conditions and any contracts entered into with you.</p>	<p>It is in our legitimate interests to enforce our terms and conditions of service or any other contracts we have entered into with you. We consider this use to be necessary for our legitimate interests and proportionate.</p>
<p>To update you on services and products and benefits we offer.</p>	<p>It is in our legitimate interests to market our services and products. We consider this use to be proportionate and will not be prejudicial or detrimental to you.</p> <p>If you would prefer not to receive any direct marketing communications from us, you can opt-out at any time by contacting us as provided in Contacting Us above.</p> <p>For direct marketing sent by email to new contacts (i.e. individuals who we have not previously engaged with), we need your consent to send you unsolicited direct marketing.</p>
<p>To send you information regarding changes to our policies and notices, other terms and conditions and other administrative information.</p>	<p>It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.</p>

<p>To:</p> <ul style="list-style-type: none"> • administer our website including troubleshooting, data analysis, testing, research, statistical and survey purposes; • improve our website to ensure that consent is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access the website; and • keep our website safe and secure. 	<p>For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the website and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.</p>
<p>To measure or understand the effectiveness of any marketing we provide to you and others, and to deliver relevant marketing to you.</p>	<p>It is in our legitimate interests to continually improve our offering and to develop our business. We consider this use to be necessary in order to effectively generate business and will not be prejudicial or detrimental to you.</p>

Generally, we do not rely on consent as a legal basis for processing your personal data although we may need your consent before sending direct marketing communications to you via email or text message. Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences by contacting us as provided in [Contacting Us](#) above.

Velocix will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES

Velocix will not sell, rent, lease or otherwise share your personal information other than as outlined in this Privacy Notice or without obtaining your consent beforehand.

We will share your personal information with the other companies within the Volaris group, business partners and advisers as necessary to carry out the purposes for which the information was supplied or collected (i.e. to provide the services and products you have requested).

Personal information will also be shared with our third party service providers and business partners who assist with the running of the website and our services and products including hosting providers and email service providers. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In addition, Velocix may disclose information about you:

- to our professional advisers including lawyers, auditors and insurers;

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of Velocix's (or one of its group companies') assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation;
- if necessary to protect the vital interests of a person; and
- to enforce or apply our terms and conditions or any other contracts or to establish, exercise or defend the rights of Velocix, our staff, customers or others.

INTERNATIONAL TRANSFERS

Where we collect personal data from you in the European Economic Area (“**EEA**”), it may be necessary for us to transfer your personal information outside of the EEA to our affiliates in the Volaris Group and our service providers and business partners located outside the EEA.

The registered office of the Volaris Group is in Canada. The European Commission has decided that Canada provides adequate levels of data protection. Therefore, we rely on this adequacy decision in ensuring that the transfer of personal data from the EEA to Canada is compliant with EU data protection laws.

Where personal information is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal information, we take steps to provide appropriate safeguards to protect your personal information.

If you want further information on the specific mechanism used by us when transferring your personal information outside of the EEA, please contact us as provided in [Contacting Us](#) above.

SECURITY OF YOUR PERSONAL DATA

Velocix uses appropriate technical and organisational security measures to protect personal information both online and offline from unauthorised use, loss, alteration or destruction.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal information.

Despite these precautions, however, Velocix cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal information. In the event of a data breach, Velocix have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

If you have any questions about security on our website or within our business operations, you can contact us as provided in [Contacting us](#) above.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

Your personal information will not be kept for longer than is necessary for the purposes for which it was collected and processed. We will retain your personal information for as long as your account is active or as needed to provide you with services or products you have requested.

YOUR RIGHTS

ACCESS TO AND UPDATING YOUR PERSONAL DATA

You have the right to access information which we hold about you ("**data subject access request**").

You may also have the right to receive personal information which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller ("**data portability**"). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. Please keep us informed if your personal information changes during your relationship with us.

RIGHT TO OBJECT

Direct marketing

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

YOUR OTHER RIGHTS

You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal information erasure ("**right to be forgotten**"); and
- restrict the processing of your personal information to processing in certain circumstances.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

EXERCISING YOUR RIGHTS

You can exercise any of your rights as described in this Privacy Notice and under data protection laws by contacting us as provided in [Contacting us](#) above.

Save as described in this Privacy Notice or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

COOKIES

In order to improve the website, we may use small files commonly known as “cookies”. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “**device**”) from the website and is stored on your device’s browser or hard drive. The cookies we use on the website won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

By continuing to browse the website, you are agreeing to our use of cookies.

If you don't want us to use cookies when you use the website, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on the website may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

LINKS

The website may, from time to time, contain links to and from the websites of our business partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy notices and Velocix does not accept any responsibility or liability for these notices. Please check these notices before you submit any personal information to these websites.

COMPLAINTS

If you have any questions or complaints regarding our Privacy Notice or practices, please contact us as provided in [Contacting Us](#) above.

If you are located in the EEA, you also have the right to complain to the relevant supervisory authority in the EEA. In the UK, this is the Information Commissioner's Office (<https://ico.org.uk/>).

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

CHANGES TO OUR PRIVACY NOTICE

Velocix reserves the right to change this Privacy Notice from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes to this Privacy Notice, we will notify you by email or by means of a prominent notice on the website prior to the change becoming effective.

Updated and Effective as of January 1, 2019
