

## **PRIVACY POLICY**

We recognize the importance of your privacy. This Privacy Policy (the “Policy”) is intended to inform you about the information we collect from your visits to our website, blogs, and social media accounts (collectively referred to as “website”) and from our marketing emails. We also explain how we use that information, and with whom the information may be shared.

### **Scope of our Online Privacy Policy**

This Privacy Policy applies to information that we collect online through our website and through marketing emails. This Policy does not cover any information collected by any other company, third-party site or third-party application that may link to, or that can be accessed from our website.

### **Information We Collect from Website Visits**

Information we obtain from your visits to our website can be broadly described as the personal information that visitors provide us, together with technical information that we may collect through the use of technology concerning those visits.

### **What information do we collect?**

We collect information from you when you register on our site, subscribe to our newsletter, respond to a survey, or fill out a form. We will also collect other types of information you might provide, such as your preferences regarding the types of information which you would like to receive, as well as responses to surveys or questionnaires. If you are a resident of the State of California, please see our Privacy Notice for California Residents for additional information concerning personal information under the California Consumer Privacy Act. When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, or phone number. You may, however, visit our site anonymously.

### **What do we use your information for?**

The information we collect from you may be used in the following ways:

- To personalize your experience: your information helps us to better respond to your individual needs.
- To improve our website: we continually strive to improve our website offerings based on the information and feedback we receive from you.
- To improve customer service: your information helps us to more effectively respond to your customer service requests and meet your support needs.
- To administer a contest, promotion, survey, or other site feature.

- To send periodic emails: The email address you provide for order processing will only be used to send you information and updates pertaining to your order. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

## **Consent and Withdrawing Your Consent**

You are under no obligation to provide us with any personal information when visiting our website and are under no obligation to subscribe to our marketing mailings. Whether you provide any personal information is entirely voluntary and is solely within your discretion. You will suffer no legal detriment if you decide not to provide any of the requested personal information. We may be unable to provide you with any services or information you request if you decide not to provide us with some or all of the personal information via our website. You can withdraw your consent at any time in the future. To do so, you can send an email to: [contactus@velocity.com](mailto:contactus@velocity.com).

## **How do we protect your information?**

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit or access your personal information.

## **Do we use cookies?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow them). They enable the site's or service provider's systems to recognize your browser and capture and remember certain information. We use cookies to understand and save your preferences for future visits, keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business. You may be able to disallow Cookies by modifying the settings in your browser. If you choose not to accept Cookies, you may be unable to access certain parts or pages of our website.

## **Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer your personally identifiable information to outside parties. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies or protect our or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

## **Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We, therefore,

have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our website and welcome any feedback about these sites.

### **Children's Online Privacy Protection Act Compliance – Notice to Minors**

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products, and services are all directed to people who are at least 13 years of age or older.

### **Online Privacy Policy Only**

This online Privacy Policy applies only to information collected through our website and not to information collected offline.

### **Your Consent**

By using our site, you consent to our Privacy Policy.

### **Changes to our Privacy Policy**

If we decide to change our Privacy Policy, we will post those changes on this page and/or update the Privacy Policy modification date below.

This policy was last modified on 9/12/25

## **PRIVACY STATEMENT FOR CALIFORNIA RESIDENTS**

The California Consumer Privacy Act ("CCPA" or "Act") grants residents of the State of California certain privacy rights in their personal information. This Privacy Statement for California Residents ("Statement") supplements the terms of the Privacy Policy explained above and should be read in conjunction with the terms of the Privacy Policy.

This Statement only applies to visitors and users of our website who are California residents (hereinafter "you" or "consumer").

### **Information We Collect**

As explained above in our Privacy Policy, the information we obtain from visitors to our website fall into two categories—the personal information that visitors provide us and technical information provided by the browser of the computer, tablet, or mobile device used when visiting our website and from our marketing emails.

### **Personal Information**

The CCPA defines personal information as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Personal information under the CCPA does not include:

- Deidentified or aggregated consumer information.
- Publicly available information from federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or information made available to a person by a consumer if the information was not restricted to a specific audience. Personal information also does not include lawfully obtained, truthful information that is a matter of public concern.

The CCPA also does not apply to certain types of information including:

- Medical or health information covered by the Health Insurance and Portability and Accountability Act of 1966 and the California Confidentiality of Medical Information Act.
- Personal information covered by the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act.
- Personal information covered by the Driver's Privacy Protection Act of 1994.
- Personal information collected, processed, disclosed or sold for use in a report or by the user of a report under the Fair Credit Reporting Act.

The CCPA also recognizes a special category of personal information called "Sensitive Personal Information." The information immediately below identifies categories or examples of personal information and Sensitive Personal Information covered by the CCPA. The below also identifies categories of information, some of which we have collected from visitors to our website or via marketing emails in the past twelve (12) months:

**A. Identifiers:**

A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

Collected by Us? YES

**B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)):**

A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected by Us? YES--name, address, telephone number

**C. Protected classification characteristics under California or federal law:**

Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected by Us? NO

**D. Commercial information:**

Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Collected by Us? NO

**E. Biometric information:**

Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected by Us? NO

**F. Internet or other similar network activity:**

Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

Collected by Us? NO

**G. Geolocation data:**

Physical location or movements.

Collected by Us? NO

**H. Sensory data:**

Audio, electronic, visual, thermal, olfactory, or similar information.

Collected by Us? NO

**I. Professional or employment-related information:**

Current or past job history or performance evaluations.

Collected by Us? NO

**J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)):**

Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected by Us? NO

**K. Inferences drawn from other personal information:**

Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

Collected by Us? NO

**L. Sensitive Personal Information:**

A person's: social security, driver's license, state identification card or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password or credentials allowing access to the account; precise geolocation, race or ethnic origin, religious or philosophical beliefs, union membership, contents of a person's mail, email and text messages unless the business is the intended recipient; genetic data; processing biometric information for the purpose of uniquely identifying a person; information collected and analyzed concerning a person's health, sex life or sexual orientation.

Collected by Us? NO

**Business Purpose For Our Collection, Use, and Disclosure of Personal Information**

The term "Business Purpose" means the use of personal information for our company's operational purposes, or other notified purposes, provided that use is reasonably necessary and proportionate to achieve the purpose for which the information was collected or processed or for another operational purpose that is compatible with the context in which the personal information was collected. The uses are described in the Policy.

We do not sell personal information. We do not share personal information for cross-context behavioral advertising, as those terms are defined in the CCPA. We also do not collect or process Sensitive Personal Information for the purpose of inferring characteristics about a person. As a result, the CCPA's rights to opt-out of the sale or sharing of personal information and to limit the use and disclosure of sensitive personal information do not apply to the information we collect.

**CCPA Privacy Rights Applicable to the Personal Information We Collect Online**

The CCPA requires that we disclose to you at or before the time we collect any personal information about you, the categories of personal information to be collected, the purposes for which the personal information is collected or used, and whether that information is sold or shared for cross-context behavioral purposes.

The CCPA provides California residents with the right to request that our company disclose:

- Categories of personal information we have collected about you.
- Categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting, selling or sharing personal information.
- Categories of any third parties to whom we disclose personal information.
- Categories of personal information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- The specific pieces of personal information we have collected about you.

You have the right to request that we delete any personal information about you that we collected from you, subject to certain exceptions outlined below. You also have the right to request that we correct any of your personal information in our possession that you believe to be inaccurate.

The CCPA further prohibits the discriminatory treatment of a person for the exercise of the privacy rights conferred by CCPA.

### **How Long We Retain Personal Information**

We strive to retain any personal information you provide via our website or marketing emails for seven (7) years from the date it was provided or last updated, unless you request that information be deleted at an earlier date. If that information is subject to a litigation hold, or is required to assert or defend a legal claim, then we will hold that information until the claim or action is finally resolved.

### **Requests to Delete Personal Information**

You have the right to request that we delete personal information collected from you. Once we receive a request and confirm the identity of the person making the request, we will delete that information from our active system unless one of the exceptions listed below applies. Personal information stored on an archived or backup system will not be deleted pursuant to such a request until the archived or backup system is restored to an active system or the information is next accessed for a disclosure or a commercial purpose.

The CCPA provides that we are not required to comply with a request to delete personal information if the information is necessary for our company to:

- Comply with a legal obligation.
- Complete the transaction for which the information was collected, provide a good or service you requested, perform a contract with you, to fulfill the terms of a written warranty, or take actions reasonably anticipated by you in the context of our ongoing business relationship with you.
- Help to ensure security and integrity to the extent your personal information is reasonably necessary and proportionate for those purposes.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, to ensure the rights of others to exercise their free speech rights, or to exercise another right provided by law.

- Comply with the California Electronic Communications Privacy Act.
- Enable solely internal uses that are reasonably aligned with your expectations based upon your relationship with our company and compatible with the context in which you provided the information.

### **CCPA's Limitations on Disclosures**

We are not obligated under the CCPA to respond to any request where compliance or disclosure would violate an evidentiary privilege under California law, or conflict with federal or state law.

The CCPA, does not require that we provide personal information to a consumer more than twice in a twelve month period. If we are unable to verify the identity of a person making a request, we may deny a request to disclose categories and other information requested.

Any disclosures we make will generally cover the twelve (12) month period preceding the request. While you can request information for longer than a 12-month period, our obligation to provide information beyond 12 months only applies to personal information collected on or after January 1, 2022, and does not apply where providing more than 12 months of information proves to be impossible or involves a disproportionate effort.

We will not charge a fee to process or respond to your request and will provide information free of charge. Where a person's requests are repetitive, manifestly unfounded or excessive, the CCPA authorizes us to either charge a reasonable fee that takes into account our administrative costs, or refuse to act on the request and notify the person making the request our reason for refusing the request. If we determine that a request warrants a fee, we will explain our decision and will endeavor to provide you with a cost estimate.

CCPA regulations prohibit us from disclosing a person's Social Security number, driver's license number, other government issued identification number, financial account number, any health insurance or medical identification number, an account password or security questions and answers.

### **How To Exercise Your Privacy Rights**

You can exercise these rights in several ways. You can make a request by submitting a request via email to: [contactus@velocity.com](mailto:contactus@velocity.com). You can also send a request by mailing it to Velocity, 20697 Fenway Ave. N., Forest Lake, Minnesota 55025, to the attention of "Privacy Request."

You may make the request on your own behalf or on behalf of your minor child. Another person who is legally authorized to act on your behalf may also submit a request for you. Please describe your request in sufficient detail to allow us to understand the nature of the request, evaluate and respond to it. Please provide sufficient information with your request to allow us to verify that you are the person about whom we collected personal information, or an authorized representative of that person.

We will acknowledge receipt of your request and begin our verification process.

### **How We Will Verify and Respond**



Before we respond to any request involving personal information, the CCPA requires that we confirm the identity of the person making the request, and if the request is made on behalf of another person, his or her authority to make the request on the other person's behalf. We are not obligated to provide, correct or delete any information pursuant to your request if we are unable to adequately verify your identity or the identity of the person making the request on your behalf.

Accordingly, we reserve the right to deny any request where we are unable to satisfactorily confirm your identity or the identity of the person making the request. If you have authorized someone to make a request on your behalf, we reserve the right to deny the request if we are unable to adequately verify the identity of that person or if we are unable to verify that the individual making the request is authorized to act on your behalf.

We will attempt to verify your identity by matching any information provided in your request against the personal information already in our possession. If you have authorized someone to make a request on your behalf, we will attempt to verify the identity of that person. We will also seek to confirm that you have authorized that person to submit a request on your behalf, which may include requesting a copy of any written authorization or power of attorney for the request. This process does not require that you establish any type of account with our company or sign up to receive any of our publications or services.

The amount of information we may require in our verification process will depend on a variety of factors including the nature of your request, the type, sensitivity and value of the personal information in our possession, the potential risk of harm that could result from any unauthorized access to, unauthorized change or unauthorized deletion of your personal information, the likelihood that fraudulent or malicious actors would seek your information and whether the information provided to us in your request is sufficient to protect against fraudulent requests or requests that are fabricated or spoofed. For instance, we will require more points of confirmation if you request that we disclose specific pieces of information rather than categories of information in our possession. Concerning a request to delete information, once we confirm your identity we will separately confirm that you want the information deleted.

During our verification process, we may request additional information from you. Any information provided to the company during our verification process will only be used for purposes of verifying your identity or the identity and/or authority of the person making the request.

We will endeavor to respond within forty-five (45) days of receipt of your request. If, however, we are unable to respond within that time, we will notify you of the reason and the additional time needed to make our response. The CCPA permits us to extend the time of our response by up to an additional 45 days.

If we deny a request in whole or in part we will endeavor to explain the reasons for our denial.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. This means, for instance, that we will not deny you services, charge you a different price, including a discount or other benefit or impose a penalty for the exercise of your CCPA rights.

## **Other California Privacy Rights**

The California Civil Code permits California Residents with whom we have an established business relationship to request that we provide them with a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the preceding calendar year. To make such a request please send an email to [contactus@velocity.com](mailto:contactus@velocity.com), or write to Velocity, 20697 Fenway Ave. N., Forest Lake, Minnesota 55025, to the attention of “Privacy Request.”

## **VISITORS FROM OUTSIDE THE UNITED STATES**

If you are visiting our website from outside the United States (“U.S.”), any information you voluntarily provide via our website and any technical information from the browser of your computer, tablet or mobile device will be transferred out of your country and into the U.S. where our company is located. The laws and protections available to the privacy of your personal information in the U.S. may significantly differ from the protections available in your country. Personal data transferred to the U.S. may be subject to lawful access requests by state and federal authorities in the U.S. If you do not want any personal information to be transferred to the U.S., please do not provide that information to our company via our website

## **VISITORS FROM THE EUROPEAN UNION**

The General Data Protection Regulation (“GDPR”), which is in effect in the European Union (“EU”) extends certain rights to natural persons involving the privacy of their personal information.

Our company is the “data controller” for any personal information provided via our website. Our company does not have a data protection officer in the EU. Any information that you provide to us will be stored in the United States; we do not intend to transfer your personal data to another country or international organization.

We strive to retain any personal information that you provide via our website or marketing emails for seven (7) years from the date you provided or last updated that information, unless you request that information be deleted at an earlier date. If that information is subject to a litigation hold, or is required to assert or defend a legal claim, then we will hold that information until the claim or action is finally resolved.

Under the GDPR, individuals are granted the following rights:

### **Right of Access**

You have the right to ask what personal information we have about you in our possession. You have the right to obtain a copy of your personal data free of charge so long as it does not adversely affect the rights of others. We may charge a reasonable fee based on administrative costs for additional copies. The right of access includes the right to request that we update, correct or complete your personal information in our possession.

### **Right of Erasure**

You have a right to request that data be deleted or erased when it is no longer needed for the purposes for which it was collected or processed, when you withdraw your consent, when data is unlawfully processed, to comply with a legal obligation of the EU or a Member State, or when you object to the processing and we are unable to demonstrate compelling, legitimate grounds for the processing which overrides your rights, freedoms or interests. Personal data does not have to be erased when and to the extent it is necessary “for the establishment, exercise, or defense of legal claims.”

### **Right to Restrict Processing**

You have a right to restrict the processing of your personal data when you contest the accuracy of the personal data in our possession until we are able to verify its accuracy, if the processing is unlawful and you oppose its erasure and request restriction instead.

### **Right to Data Portability**

The right to data portability is triggered when processing activity was based on your consent, or was necessary for the performance of a contract, and the processing was carried out by automated means. This right, however, shall not adversely affect the rights of others.

### **Automated Decision Making**

You have the right not to be subjected to decision-making based *solely* on automated processing or profiling that either significantly affects you or results in some sort of legal effect. This right does not apply to decisions that are necessary for entering into or performing a contract with you or are based on your explicit consent.

### **Right to Object to Processing**

You have the right to object to processing when it is based on a “legitimate interest” of the controller or a third party, or to processing that occurs for direct marketing purposes.

### **Withdrawing Your Consent**

You have the right to withdraw your consent at any time by unsubscribing to future marketing mailings via the Unsubscribe link at the bottom of any marketing email, by sending an email to [contactus@velocity.com](mailto:contactus@velocity.com).

### **Right to Complain**

You also have the right to lodge a complaint with the supervisory authority about our data privacy practices where you reside.

### **How to Exercise These Rights**

You can exercise these rights by sending an email to: [contactus@velocity.com](mailto:contactus@velocity.com). We will review any requests we receive and will endeavor to respond in a timely manner. For security reasons, we may request specific information from you to help us confirm your identity before taking action on any

request, and to ensure your right of access and the exercise any of GDPR right does not adversely affect the rights of others.

We reserve the right to refuse to act on a request, or to charge a reasonable administrative fee when a request is either manifestly unfounded or excessive because of its repetitive character.