**Velodu LLC Data Privacy Notice**

1. **Definitions**
   1. “Velodu” means Velodu LLC.
   2. “Data subject” is an identifiable person from whom data is collected.
   3. “Identifiable person” is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.
   4. “Personal data” means any information relating to an identified or identifiable natural person
   5. “Sensitive personal data” means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life.
   6. “Firmographic data” means data relating to a business owned by or which employs the data subject.
   7. “Third-party” means any entity that is not Velodu or the data subject.
   8. “Primary research client” means the third-party firm requesting the collection and analysis of data on market research data subjects.
2. **Introduction**
   1. Velodu is a consulting firm engaging in market research through the collection and analysis of market data. The data is collected on behalf of a primary research client.
   2. At Velodu, we are committed to maintaining the trust and privacy of any data subject who discloses his/her details to us. Velodu is not in the business of passing any personal information it collects to any firm or entity beyond the primary research client.
3. **Type of data we collect**
   1. Velodu operates under a data minimization approach by collecting only data directly related to particular research questions posed by the primary research client, demographic data about the data subject (which may include personal data and sensitive personal data), and firmographic data. In most cases, this information is self-reported by the data subject, allowing the data subject to opt out of sharing any data based on his/her comfort level.
   2. More specifically, we may collect, process, and store the following categories of personal information about our data subjects:
      1. Contact details including (but not limited to) name, title, addresses, telephone numbers, and email addresses.
      2. Demographic data including (but not limited to) location, gender, age, and income level.
      3. Firmographic data including (but not limited to) revenue, number of employees, and technologies used.
      4. Audio and video recordings of interviews.
4. **How we collect data**
   1. We collect personal data about market research data subjects via the following channels:
      1. Information provided by the primary research client (which is usually scrubbed of any identifying personal information before it is received by Velodu)
      2. Third-party recruiting agencies
      3. Online surveys housed through third-party platforms, such as the primary research client’s website or survey websites
      4. Recorded face-to-face interviews with Velodu
      5. Recorded audio-visual interviews with Velodu that are conducted via a third-party teleconferencing platform
5. **How we use the data**
   1. Velodu will adhere strictly to its own privacy policy when handling any data it receives, whether directly from the data subject or from a third-party. However, how personal data is used by a third-party before or after it is provided to Velodu is under the conditions of the privacy policy set by the third-party. It is the data subject’s responsibility to seek, know, and understand the privacy policies of any third-party. By request and whenever possible, Velodu will assist a data subject in locating the privacy policy of a third-party.
   2. We will use research data to help the primary research client to develop:
      1. New products and services
      2. Marketing tools and plans
      3. Product and brand strategies
      4. Customer loyalty strategies and programs
      5. Pricing strategies for products and services
   3. We will only use data subject information for the purposes for which we collect it.
6. **With whom we might share your data** 
   1. Primary research client
   2. Third-party audio and video transcription services
7. **How long we keep your data** 
   1. We will retain your personal information for as long as necessary to fulfill the research purposes for which it was collected. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
   2. The maximum retention periods for particular types of data will be as follows:
      1. Contact details – one year
      2. Demographic data – five years
      3. Firmographic data – five years
      4. Audio-video recordings – five years
      5. Transcripts – five years
8. **How we protect your data** 
   1. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered, disclosed, used, or accessed in an unauthorized way. In addition, we limit access to your personal information to those employees, agents, contractors, and other third parties who have a business need-to-know.
   2. Whenever possible, your data is anonymized so that it can no longer be associated with you.
   3. We will take all reasonable steps to destroy or erase from our systems all personal data that we no longer require.
9. **Your privacy rights and Velodu contact information**
   1. Under certain circumstances, by law you have the right to:
      1. Access: You have the right to know which data we have stored about you and for which purposes.
      2. Correction: You may have incorrect data corrected.
      3. Erasure: You also have the right to request the deletion of data if, for example, the data is not required to achieve the purposes for which it was stored or if we are not permitted to store the data for other reasons.
      4. Restriction of Processing: You have the right to have data blocked if, for example, the correctness of data has not been determined and still needs to be checked.
      5. Objection of Processing: You can object to the processing. This objection must contain an explanation of the particular situation that makes further processing unacceptable to you. The objection will be carefully examined and the data will be blocked for the duration of the examination.
      6. Data portability: You have the right to request data which you have made available to us and which is processed automatically in a common, machine-readable format from us.
10. **Contacting Velodu with privacy concerns**
    1. Protecting our data subjects’ privacy is fundamental to the trusting relationship we strive to maintain with all with whom we work. If you have any questions or concerns, or wish to exercise one or more of these rights outlined in Section 9, please feel free to contact:

**Velodu Founder and Managing Partner**

Gary Pansino

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**Velodu Partner**

Kristy Pansino

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1. **Changes to the Privacy Policy**
   1. We reserve the right to change this Privacy Policy as needed. The current Privacy policy can always be found [here](https://docs.google.com/document/d/1fuThfS05YZq9pGQq8LEB3krgqO7SX3zc/edit?usp=sharing&ouid=100424010275508855028&rtpof=true&sd=true). We recommend checking the Privacy Policy regularly.