



Privacy Policy

Policy Owner: Chief Technology Officer

Effective Date: January 1, 2023

This Privacy Policy describes how Vellox Group collects, uses, stores, discloses, and protects personal information when you use our websites, applications, products, and services. It also explains your privacy rights and how applicable laws protect you.

We use your personal data to provide and improve our services. By using our services, you agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

There are words which have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for you to access our services or parts of our services.
- **Company** (referred to as either "the Company", "Vellox Group", "We", "Us", or "Our" in this Agreement) refers to FV Technologies / Dakota Network Consulting Inc / Avinet trading as Air Maestro / Spidertracks / ADSoftware, having a principal place of business at 1321 Upland Dr. PMB 17061 Houston, TX 77043
- **Cookies** are small files that are placed on your computer, mobile device, or any other device by a website, containing the details of your browsing history on that website among its many uses.
- **Device** means any device that can access the Services such as a computer, a cellphone, or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Services** refers to Vellox Group websites, platforms, software products, and applications.
 - **Velloxgroup.com**
 - **Dispatch Pro (formerly FV CAD)**
 - **DSP Crew Login**
 - **DSP Crew**
 - **DSP Dashboard**
 - **DSP Flight Operations**
 - **DSP Map**
 - **DSP Pager**
 - **DSP Transport**
 - **DSP Transport Scheduler**
 - **Maintenance Hub (formerly ADSoftware)**

- **Operations Suite (formerly Complete Flight)**
- **Fleet Manager (formerly Spidertracks)**
- **Ops & Safety Suite (formerly Air Maestro)**

- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Services, to provide the Services on behalf of the Company, to perform services related to the Services, or to assist the Company in analyzing how the Services are used.
- **Third-party Social Media Service** refers to any website or any social network website through which a user can log in or create an account to use the Services.
- **Usage Data** refers to data collected automatically, either generated by the use of the Services or from the services infrastructure itself (for example, the duration of a page visit).
- **Website** refers to VelloxGroup.com
- **You** means the individual accessing or using the Services, or the company, or other legal entity on behalf of which such individual is accessing or using the Services, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected: Personal Data

At Vellox Group, we are committed to safeguarding your privacy and ensuring the transparency of our data collection practices. When you engage with our services, we may request certain personally identifiable information (PII) that is necessary for providing and improving our services. This information is primarily collected during the account creation process on our website, support portal, and when using our products. Additionally, we maintain records of our customers to ensure the quality and security of our services.

The personally identifiable information we may collect includes, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, County, ZIP/Postal code, City
- Usage Data

We collect this information to effectively communicate with you, provide personalized services, process transactions, and enhance your overall experience with our products and services. Rest assured, we handle your personal data with the utmost care and only use it for the purposes outlined in our Privacy Policy.

Usage Data

Usage Data is collected automatically when using the Services.

Usage Data may include information such as your device's internet protocol address (e.g. IP address), browser type, browser version, the pages of our services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Services by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Services or when you access the Services by or through a mobile device.

Operational and Location Data

Certain services, including aviation tracking or operational monitoring products, may process location-based telemetry and operational data.

This information may include:

- Device identifiers
- Aircraft position reports
- Geographic location coordinates
- Altitude, speed, and heading
- Timestamps and system status information.

This data is processed to:

- Provide tracking and situational awareness services
- Display operational information to authorized users
- Support safety monitoring and search-and-rescue coordination.

Customer organizations typically act as the data controller for operational tracking data processed through our services, while Vellox acts as a data processor in accordance with applicable agreements.

Certain services may allow customers to publish operational tracking information through public links or integrations. Customers are responsible for managing access to such information and determining the appropriate visibility of operational data.

Purpose and Lawful Basis for Processing

We collect and process your personal data for the following purposes and rely on the lawful basis of contractual necessity:

Contractual Necessity: We process your personal data in order to fulfill our contractual obligations to you and provide you with the products and services you have requested. This includes:

- **Managing and Processing Customer Data:** Our software collects and processes personal data acquired while customers use our platform. This includes but is not limited to information such as user names, contact details, and any other data generated or inputted during the use of our software.
 - The personal data collected is integral to the functionality of our software and is processed to enable customers to effectively utilize our platform for their business needs. This may involve processing user data to generate insights, facilitate communication, or carry out specific tasks as intended by the features of our software.

- **Providing customer support:** We collect and process personal data such as your contact details and purchase history to provide you with assistance and support related to our products and services.
- **Administering your account:** We collect and process personal data such as your account information and preferences to manage your account with us and facilitate your use of our services.
- **Processing payments:** We collect and process personal data such as your payment details to process payments for products and services you purchase from us.

Services Performed by Customers on Their Behalf: In some cases, our customers may use our products or services to perform services on their behalf. In such instances, we may process personal data on behalf of our customers as necessary for the performance of a contract between our customer and their clients or other third parties. This may include processing personal data such as names, contact information, and other relevant data as instructed by our customers.

We rely on the necessity of processing your personal data for the performance of a contract to which you are a party as the lawful basis for processing under the General Data Protection Regulation (GDPR).

Tracking Technologies and Cookies

We use cookies and similar technologies to operate our website and to understand how users interact with it.

Non-essential cookies, including analytics tools and tracking technologies used by third-party partners, are disabled until you provide explicit consent.

You may withdraw your consent or modify your preferences at any time through the Cookie Settings link.

We use cookies and similar tracking technologies to operate, improve, and personalize our Services. These technologies help us understand how our Services are used, provide core functionality, and deliver relevant content and advertising. The technologies we may use include:

Cookies (Browser Cookies):

A cookie is a small text file stored on your device. You can configure your browser to refuse all cookies or to notify you when a cookie is being set. If you choose to disable cookies, some parts of our Services may not function properly. Unless you adjust your settings, our Services may use cookies.

Local and Session Storage:

We may use browser-based storage (such as HTML5 local storage or session storage) to save information and preferences on your device. These technologies allow for faster performance and improved functionality.

Pixels and Web Beacons:

Certain sections of our Services and our emails may contain electronic files (such as clear gifs, pixel tags, or single-pixel gifs). These are used to measure engagement, track the success of campaigns, and help us analyze traffic patterns.

Analytics and Performance Tools:

We may use analytics providers (such as Google Analytics or similar services) that place cookies or use device identifiers to help us understand how you use our Services and improve performance.

Advertising Technologies:

We may allow third-party advertising partners to use cookies, pixels, and similar tools to deliver targeted ads based on your browsing activity and measure their effectiveness.

Types of Cookies We Use:

Essential Cookies - Required for the operation of our Services (e.g., enabling secure log-in).

Performance and Analytics Cookies - Help us understand how visitors interact with our Services.

Functional Cookies - Remember your choices and personalize your experience.

Advertising/Targeting Cookies - Deliver relevant ads and track effectiveness across websites and apps.

Your Choices:

You can manage or disable cookies through your browser or device settings. Some browsers also offer "Do Not Track" signals or global privacy control options, which we honor where legally required. For more information about cookies, including how to see what cookies have been set and how to manage or delete them, visit www.allaboutcookies.org.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: **Session Cookies**

Administered by: Us

Purpose: These Cookies are essential to provide you with services available through the Website and Mobile Applications and to enable you to use certain features. They help authenticate users, prevent fraudulent use of accounts, and ensure security. Without these Cookies, the services you request cannot be provided.

Cookies Policy / Notice Acceptance Cookies

Type: **Persistent Cookies**

Administered by: Us

Purpose: These Cookies record whether you have accepted or dismissed the use of cookies, so we do not repeatedly prompt you with the same notice.

Functionality Cookies

Type: **Persistent Cookies**

Administered by: Us

Purpose: These Cookies remember choices you make (such as login details, language preference, or region) to provide a more personalized experience and avoid having to re-enter preferences every time you use our Website or Mobile Applications.

Performance and Analytics Cookies

Type: **Persistent Cookies**

Administered by: Third Parties (e.g., Google Analytics)

Purpose: These Cookies are used to collect information about traffic to our Services and how users interact with them. The information gathered is aggregated and anonymous, and helps us understand usage patterns, improve performance, and optimize the content and features of our Services.

Advertising / Targeting Cookies

Type: **Persistent Cookies**

Administered by: Third Parties (e.g., advertising networks, social media platforms)

Purpose: These Cookies track your browsing habits to deliver advertising that is more relevant to you and your interests, measure the effectiveness of campaigns, and limit how often you see an ad.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Services**, including to monitor the usage of our Service.
- **To manage your account**: to manage your registration as a user of the Services. The Personal Data you provide can give you access to different functionalities of the Services that are available to you as a registered user.
- **For the performance of a contract**: the development, compliance, and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with us through the Services.
- **To contact you**: To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide you with news**, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or inquired about unless you have opted not to receive such information.
- **To manage your requests**: To attend and manage your requests to us.
- **For business transfers**: We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or another sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our services users is among the assets transferred.
- **For other purposes**: We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.

Velox Group is committed to protecting your personal data and only shares it with third parties when necessary for the provision of our services or as required by law. We may share your personally identifiable information (PII) with the following categories of recipients:

- **Service Providers**: We may engage third-party service providers to facilitate our services, including but not limited to payment processing, customer support, and data analysis. These service providers have access to your personal data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **Business Partners**: In certain circumstances, we may share your PII with trusted business partners to enhance our services or for joint marketing activities. However, such sharing will always be subject to your consent where required by applicable law.
- **Legal Obligations**: We may disclose your personal data if required to do so by law or in response to valid legal requests, such as court orders or subpoenas.

Velox Group ensures that any third parties with whom we share your personal data are bound by contractual obligations to safeguard it and use it solely for the purposes for which it was provided.

Specific Parties We Use:

- **HubSpot:** HubSpot is utilized for customer relationship management (CRM) purposes, facilitating efficient communication and support services. As well as for sales and marketing purposes. The lawful basis for processing is consent and performance of a contract.
- **AWS (Amazon Web Services):** The company leverages AWS for cloud computing services, data storage, and infrastructure support. The lawful basis for processing is performance of a contract.
- **Azure:** The company utilizes Azure services for cloud computing, hosting, and other related infrastructure requirements. The lawful basis for processing is performance of a contract.
- **Heroku:** The company utilizes Heroku for data storage, enabling scalable and reliable performance of our DSP Transport application. The lawful basis for processing is performance of a contract.
- **Plivo:** The company uses Plivo for communication services, specifically SMS services, to enhance communication for customer from our DSP CAD. The lawful basis for processing is performance of a contract.
- **Esendex:** The company utilizes Esendex for communication services, specifically SMS messaging used within Ops & Safety Suite (formerly Air Maestro) to send operational notifications and alerts. The lawful basis for processing is performance of a contract.
- **Message Media:** The company utilizes MessageMedia for communication services, specifically SMS messaging used within Fleet Manager (formerly Spidertracks) to send operational notifications and alerts. The lawful basis for processing is performance of a contract.
- **Sendgrid:** The company utilizes SendGrid for communication services, specifically email delivery and messaging within Fleet Manager to send operational notifications, alerts, and system-generated communications. The lawful basis for processing is performance of a contract.
- **Microsoft:** The company relies on Microsoft products and services for various business operations and productivity needs. The lawful basis for processing is performance of a contract.
- **Sophos:** The company utilizes Sophos for cybersecurity solutions, and threat detection. The lawful basis for processing is performance of a contract.
- **SentinelOne:** The company utilizes SentinelOne for endpoint protection. The lawful basis for processing is performance of a contract.
- **WatchGuard:** The company employs WatchGuard for network security and firewall solutions to safeguard our systems and data. The lawful basis for processing is performance of a contract.
- **NinjaOne:** The company utilizes NinjaOne for remote monitoring and management of IT systems, enhancing our technical support capabilities. The lawful basis for processing is performance of a contract.
- **Zendesk:** The company utilizes Zendesk for our customer support portal. The lawful basis for processing is for performance of a contract.

Request Retention

A record of all consumer requests shall be maintained for at least twenty-four (24) months and shall include the following elements:

- request date
- nature of request
- request method
- date of company response
- nature of company response
- basis for any denial

Records of consumer requests shall not be shared with any third party except as necessary to comply with a legal obligation.

Your Data Protection Rights

Depending on your location, you may have certain rights under applicable data protection laws, including the General Data Protection Regulation (GDPR), UK GDPR, and other global privacy frameworks. These rights may include:

- The right to access: You may request confirmation of whether we process your personal data and obtain a copy of that data.
- The right to rectification: You may request correction of inaccurate or incomplete personal data.
- The right to erasure: You may request deletion of your personal data where legally permitted.
- The right to restrict processing: You may request that we limit the processing of your personal data in certain circumstances.
- The right to object: You may object to processing based on legitimate interests or withdraw consent where processing is based on consent.
- The right to data portability: Where applicable, you may request a copy of your personal data in a structured, commonly used, and machine-readable format.
- The right to lodge a complaint: You have the right to lodge a complaint with a supervisory authority in your jurisdiction.

How to exercise your rights

You may exercise these rights by submitting a request via email at privacy@velloxgroup.com or through the request mechanisms available on our support portal. We may require verification of your identity before fulfilling a request. Requests are handled in accordance with applicable legal requirements and response timelines.

Retention of Your Personal Data

The Company will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including personal data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, territory, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Where and How Your Personal Data is Stored

Personal data is stored and processed using secure systems operated by Vellox Group and its authorized service providers. Data may be hosted in secure cloud environments, including infrastructure provided by third-party providers such as Amazon Web Services (AWS) and Microsoft Azure.

Personal data may be processed in the countries where Vellox Group operates or where our service providers are located. Where personal data is transferred across borders, we ensure appropriate safeguards are in place to protect the data in accordance with applicable data protection laws.

We implement technical and organizational measures designed to protect personal data, including encryption of data at rest and in transit, access controls, monitoring, and incident response procedures.

Disclosure of Your Personal Data

We do not disclose personal information in response to requests that are not legally binding. Personal information is disclosed only where required by law or supported by a valid legal process. Where applicable, disclosures are made in accordance with contractual obligations and with the authorization of the relevant customer.

In certain circumstances involving aviation safety or emergency response, operational tracking data may be disclosed to relevant aviation authorities or emergency services where necessary to support safety operations or comply with legal obligations.

Business Transactions: If the Company is involved in a merger, acquisition, or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different Privacy Policy.

Law enforcement: Under certain circumstances, the Company may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements: The Company may disclose your personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Services
- Protect the personal safety of users of the Services or the public
- Protect against legal liability

Security of Your Personal Data

The security of your personal data is important to us and we take all reasonable steps to ensure its integrity. All data is encrypted at-rest using AES-256, as our backups, and all data is encrypted in-transit using TLS 1.2 or higher. Remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

Children's Privacy

Some of our Services support operational workflows for medical transport, emergency response, and related services. In these contexts, personal data relating to children may be processed as part of providing the Services to our customers, including in emergent and non-emergent medical transport scenarios.

Where personal data relating to children is processed, it is handled in accordance with applicable data protection laws and solely for the purposes of delivering the Services as instructed by our customers. In such cases, our customers act as the data controller and are responsible for determining the lawful basis for processing, including obtaining any required parental or guardian consent.

Vellox Group does not knowingly collect children's personal data for independent commercial purposes. Requests relating to children's personal data are handled in accordance with our identity verification and request-handling procedures.

Links to Other Websites

Our Services may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Services, prior to the change becoming effective and update the "Last Updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, you can contact us via the [Contact Us](#) page.

OUR ARTICLE 27 REPRESENTATIVE

We have appointed UK Representatives under Article 27 of the UK GDPR. Our appointed representative is:

Our UK Representative:

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Our nominated UK Representative is: GDPR Local Ltd.

Adam Brogden

contact@gdprlocal.com

Tel +44 1772 217800

1st Floor Front Suite

27-29 North Street, Brighton

England

BN1 1EB

Outside of the UK

Anurag Phadke

privacy@velloxgroup.com

Tel [+1-888-410-4980](tel:+1-888-410-4980)

Vellox Group, having a principal place of business at

1312 17th Street

Unit #2719

Denver, CO 80202

Version History

Version	Date	Description	Author	Approved by
1.0	January 1, 2023	Initial policy	Shenandoah Stubbs	Danyale Clay
2.0	June 7, 2024	Updates for GDPR	Shenandoah Stubbs	Danyale Clay
2.1	December 9, 2024	Update adding CF and Denver address	Shenandoah Stubbs	
2.2	March 10, 2025	Adding all Companies into Vellox Group	Shenandoah Stubbs	JJ Small
2.3	November 20, 2025	Updated to add tracking emails, etc	Shenandoah Stubbs	Anurag Phadke
2.4	January 23, 2026	Updated for GDPR Compliance	Shenandoah Stubbs	Shenandoah Stubbs
2.5	March 11, 2026	Added a schedule for Fleet Manager	Shenandoah Stubbs	Aleks Banas