

## Marketing Events Privacy Statement

January 2020

Webroot Inc. (“we”, “us”, or “our”; such references also include Webroot’s affiliates and subsidiaries, as applicable) is committed to protecting and respecting your privacy.

This Webroot Marketing Events Privacy Statement (“**Statement**”) describes how we process and use Personal Data we collect from you when you interact with us at tradeshows, marketing events, conferences and similar events, and we collect or you otherwise provide your Personal Data to us. Information about our privacy practices with respect to your other interactions with us, including through use of our website or our products and services can be found [here](#). Other documents, including [Terms of Use](#), our [Cookies Policy](#), and any other terms referenced on this website or in those policies or terms, describe Webroot’s Personal Data practices as such practices are described therein.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. By providing any of your Personal Data to us at a trade show, conference, or other marketing event, you are accepting and consenting to the practices described in this Statement. Personal data is data that can reasonably be used to identify, either directly or indirectly, an individual or reasonably can be linked to a particular individual (“**Personal Data**”).

### INFORMATION WE MAY COLLECT AND HOW WE MAY USE IT

We may collect and process the following information about you:

The tables below provide further information about the category, use and source of the Personal Data we may collect.

Categories of information collected	Summary of Purpose of Use (see detailed table below for more information)	Sources of Personal Data
Contact registration information, Name, title, company name, mailing address, email address, telephone number	Communicate with you	<ul style="list-style-type: none"><li>You</li><li>Other Sources such as Event Organisers</li></ul>

Purposes of Use
<p><b>Communicate with you, for example:</b></p> <ul style="list-style-type: none"><li>To provide you with the information, products and services that you request from us;</li><li>To provide you with information about other software and services we offer that are similar to those that you have already purchased or inquired about</li><li>To provide you, or permit selected third parties to provide you, with information about software or services we feel may interest you;</li><li>To communicate with you about our events, surveys, contests, sweepstakes, security offerings, and other promotions (if you have not objected to receiving marketing communications);</li><li>To comply with and perform other activities consistent with this Statement.</li></ul>

Information we receive from other sources. We may receive information about you from the event organizer if they have received your consent to share such information with us. This information may be shared internally and combined with information collected during our interactions with you.

Information we receive from other sources. We may combine information we receive from third parties with Personal Data you give to us and other information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

The legal basis for collecting and using the personal data described above will depend on the personal data concerned and specific context in which we collect it, such as:

- With customer or user consent, e.g., to receive marketing materials if necessary under applicable law
- Where the processing is necessary for the performance of a contract, e.g. to provide technical support
- Where necessary to comply with law
- Where the processing is necessary for the purposes of our legitimate interests, taking into account individual interests. Our legitimate interests include providing the products and services, internal record-keeping and administrative purposes and to operate, maintain and improve the website or portals.

## **DISCLOSURE OF YOUR INFORMATION**

The California Consumer Privacy Act 2018 sets forth obligations for businesses that “sell” personal information. Webroot does not engage in such activity based on our current understanding of the definition of sell. We may share certain personal information with other businesses or allow them to collect certain personal information through the use of website cookies, pixels, or other technologies in order to provide services to us such as analyzing our Services and advertising and marketing our Services on other sites or apps. You can control certain of these cookies through browser settings and other controls.

Under Nevada law, certain Nevada consumers may opt out of the “sale” of “personally identifiable information” as such terms are defined under Nevada law. However, we do not engage in such activity. If you have questions about this, you may contact us at [privacy@webroot.com](mailto:privacy@webroot.com).

We may share your Personal Data with our affiliates and subsidiaries. Such sharing will be for our reasonable business purposes, consistent with the types of uses for which we use your Personal Data as described in this Statement.

We may also share your Personal Data with other selected third parties, including:

- business partners, suppliers, and subcontractors, who have contractually agreed to keep your information secure and confidential and to use it only for the purpose for which it was supplied, for the performance of any contract we enter into with them or you; and
- third-party customer support providers.

Finally, we may disclose your Personal Data:

- in the event that we or our affiliates or subsidiaries contemplate or enter into a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all

or any portion of our business or assets, in which case we or our affiliates or subsidiaries may disclose your Personal Data as part of that deal;

- if we have a good faith belief that we are under a duty to disclose or share your Personal Data in order to comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies, or in order to enforce or apply our [Terms of Use](#), or the terms and conditions governing our products or services, or other agreements between us and you or between us and any third parties that relate to you; or to protect the rights, property, or safety of Webroot and our customers, our affiliates or subsidiaries, their customers, or other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud and network protection.

## **WHERE WE PROCESS YOUR PERSONAL DATA**

The information which we collect from you may be transferred to, processed at, and stored in the USA or any location where our subsidiaries, affiliates, or service providers maintain facilities. By submitting your Personal Data, you hereby consent and agree to this transfer, storing, or processing.

We will take those steps reasonably necessary to ensure that your information is treated securely and in accordance with this Statement and the requirements of applicable law wherever the information is located. In order to safeguard your Personal Data in countries outside the European Economic Area (EEA), we have implemented appropriate physical, technical, and organizational measures to ensure a level of security appropriate to the risks. In addition, we have put in place in agreements between us and our affiliates or subsidiaries in the EEA containing standard data protection clauses which have been adopted by the European Commission.

## **SECURITY**

Once we receive your information, we take appropriate physical, technical, and organizational security measures to protect it from misuse, unauthorized, or unlawful access or disclosure, loss, alteration, damage, or destruction, including by implementing physical, technological, and organizational safeguards.

## **YOUR RIGHTS**

Subject to data protection laws, customers and users may have the following rights regarding Webroot's handling of Personal Data. Certain information may be exempt from such requests under applicable law.

We will take reasonable steps to verify Your identity when exercising these rights. To exercise these rights, you or your agent may be required to authenticate to your account or provide information contained in your account profile. Please ensure that you keep your profile information up to date and accurate so that we may verify your requests.

- **Access.** The right to access Personal Data held by Webroot. Customers in California may request the categories of Personal Information we collect, disclose, or sell about you, the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we share personal information. Those users may also request access to or a copy of certain information we hold about You.
- **Rectification.** The right to request correction of Personal Data that is incomplete, incorrect, unnecessary or outdated.

- **Right to be Forgotten.** The right to request erasure of all Personal Data that is incomplete, incorrect, unnecessary or outdated within a reasonable period of time. Webroot will do everything possible to erase Personal Data if a user or customer so requests. However, Webroot cannot erase all Personal Data if it is technically impossible due to limitations of existing technology or for legal reasons, such as Webroot is mandated by law to retain Personal Data.
- **Restriction of Processing.** The right to request restriction of processing Personal Data for certain reasons, provided Webroot does not have an overriding, legitimate interest to continue processing.
- **Data Portability.** If requested, Webroot will provide Personal Data in a structured, secure, commonly used and machine-readable format.
- **Right to Withdraw Consent.** If Personal Data is processed solely based on consent, and not based on any other legal basis, customers can withdraw consent.
- **Data Protection Contact.** The right to contact the data protection regulator regarding Webroot's handling of Personal Data.

To exercise any of the above listed rights, complete the form found [here](#) or email Webroot at [privacy@webroot.com](mailto:privacy@webroot.com), or submit a ticket to customer support found [here](#), or contact customer support at the appropriate geographical telephone number found [here](#), or, mail Webroot Inc., 385 Interlocken Crescent, Suite 800 Broomfield, CO 80021, Attn: Privacy Team. Webroot will process requests under applicable law and within a reasonable period of time.

California law provides California residents with the right to not be discriminated against (as provided for in applicable law) for exercising these rights or their right to opt-out of sales of personal information. Please note that certain information may be exempt from such requests under California law.

Under California's "Shine the Light" law California residents have the right, twice in a calendar year, to request and obtain from Webroot information about Personal Data Webroot has shared, if any, with other businesses for their own direct marketing uses. Webroot does not currently share your Personal Data with other businesses for their own direct marketing uses.

## **OPT OUT OF MARKETING**

You have the right to opt-out of receiving marketing-related messages from Webroot. You can exercise your right to prevent such processing by, where applicable, using any "unsubscribe" button or link that is contained in any emails we may send to you or by registering your preference on certain boxes on the forms we use to collect your data.

Customers and users can opt-out of receiving marketing and promotional communications from Webroot by emailing [privacy@webroot.com](mailto:privacy@webroot.com), submitting a ticket to customer support found [here](#), contacting customer support at the appropriate geographical telephone number found [here](#), or mailing Webroot Inc., 385 Interlocken Crescent, Suite 800 Broomfield, CO 80021, Attn: Privacy Team. We will continue to process Personal Data to deliver operational and service-related communications relating to purchases, changes to Products and Services or policies, and other purposes as permitted by law.

In addition, you may opt out of online behavioral advertising by following the links in our [Cookies Policy](#).

## **RETENTION OF PERSONAL DATA**

We retain your Personal Data:

- for as long as your account is active or as needed to provide you with products or services or to fulfil our contractual obligations;
- as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements; and
- for as long as is necessary for the purpose for which we collect it.

After your service has expired or terminated, we may delete your name, email address, and transactional data (e.g., license key), so that we limit our ability to reasonably identify you.

## **CHANGES TO OUR STATEMENT**

As laws and best practices evolve, this Statement will likely change. By continuing to access our Websites you acknowledge and accept the Statement as revised. We encourage you to periodically review this Statement to stay informed about how we collect, use and disclose Personal Data. If we update this Statement, the new statement will be posted to the website ten (10) days prior to the changes taking effect. If we make a material change to the Statement, you will be provided with appropriate notice in accordance with legal requirements. At such time, our continued use of the Services after notice of posting or notice of such changes constitutes your agreement to this latest version of this Policy and any future revisions.

## **CONTACT US**

Questions, comments and requests regarding this Statement should be addressed to:

Privacy Team, Webroot Inc. 385 Interlocken Crescent, Suite 800 Broomfield, CO 80021, USA Email: [privacy@webroot.com](mailto:privacy@webroot.com)

If you are located in the EEA:

Privacy Team, Webroot International Limited, Block A, Georges Quay Plaza, George's Quay Dublin 2, Ireland. Email: [privacy@webroot.com](mailto:privacy@webroot.com)

**FOR THE PURPOSE OF EUROPEAN DATA PROTECTION LAWS, THE DATA CONTROLLER FOR PURCHASES OF WSA OFFERINGS IN NORTH AMERICA IS WEBROOT INC., 385 INTERLOCKEN CRESCENT, SUITE 800, BROOMFIELD, CO 80021, USA. FOR PURCHASES OF WSA OFFERINGS OUTSIDE NORTH AMERICA, THE DATA CONTROLLER IS WEBROOT INTERNATIONAL LIMITED, BLOCK A, GEORGES QUAY PLAZA, GEORGE'S QUAY, DUBLIN 2, IRELAND. WEBROOT INC.'S NOMINATED REPRESENTATIVE FOR THE PURPOSE OF EUROPEAN DATA PROTECTION LAWS IS WEBROOT INTERNATIONAL LIMITED**