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# Webroot WiFi Security Privacy Statement

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**Effective Date: August 7, 2018**

This Webroot WiFi Security Privacy Statement (the “**WiFi Security Privacy Statement**”) applies to our Webroot WiFi Security service that you purchase, download, access, install or use (“**WiFi Security**”). This WiFi Security Privacy Statement describes Webroot’s policy regarding the collection, use and disclosure of your personal information (*information that can identify you as a living individual*) when using WiFi Security.

**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.

Other documents, including our [Terms of Use](#), our [Website Privacy Statement](#), our [Cookies Policy](#), and any other terms referenced on this website or in those policies or terms, also describe Webroot’s personal information practices.

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## SUMMARY

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We **do not** collect or log any browsing activity, IP addresses, downloaded data (or shared or viewed data), or DNS queries. We only collect the data required to process your order and provide you with WiFi Security.

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## INFORMATION WE MAY COLLECT

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We may collect and process the following data about you:

**Personal Information you provide to us.** When you purchase/register for WiFi Security, or when you contact us (such as by phone, email, or via Customer Support, you may give us information about you. The information you give us may include:

- Email address/username;
- Name and billing address, business type, if applicable, and other information in connection with your transaction; and
- Product and transaction information.
- **Payment Data:** To pay for a subscription to WiFi Security on Webroot.com, we will direct you to a third party payment processor. The third party payment processor will provide us with the date on which you made the payment and your expiration data, along with a generic number (the “**Order ID number**”). We need your Order ID Number in order to link your order to your Email address/User Account. If you pay through a credit card, we will store the last four (4) digits of your credit card number. Please refer to the third party payment processor’s privacy

policy to understand how your information will be processed by them. If you order through the Apple or Google Play stores, or a partner website, the respective store or site will manage the payment process and payment method. The store or site will then provide a transaction receipt to us to notify us that the purchase was successful.

**Information we collect from you: WiFi Security Data and Logs.** Minimal usage statistics are collected to maintain quality of service. WiFi Security servers log the following information each time you activate and use WiFi Security (each, a “**Session**”): (1) date and time on which the Session began and finished; (2) the amount of data transmitted during the Session; (3) to which VPN server location you are connected; (4) the country you’ve connected from (we do not hold IP addresses); (5) the number of devices simultaneously connected through your account. **WiFi Security does not collect your browsing activity, the sites you visit, downloaded data (or shared or viewed), DNS queries, or IP addresses.**

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## **HOW WE MAY USE YOUR INFORMATION**

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We may use information held about you in the following ways:

- to register your account with us;
- to enable you to purchase and use certain products and services;
- to process and renew your orders;
- to provide customer support;
- to communicate with you regarding WiFi Security, for example to notify you about changes or updates to our service and offerings, and changes to our terms and conditions and policies;
- to communicate with you about our events, surveys, contests, sweepstakes, security offerings, and other promotions (*if you have not objected to receiving marketing communications*);
- to personalize and manage our relationship with you;
- to check for and distribute updates to WiFi Security;
- to conduct research and analysis, such as to improve our products and services;
- to analyze how our customers use our security products and services;
- to develop new security products and services and to market related products and services;
- to develop aggregate and non-identifiable statistics;
- to comply with applicable legal requirements, agreements, and policies; and

- to comply with and perform other activities consistent with this WiFi Security Privacy Statement.

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## **DISCLOSURE OF YOUR INFORMATION**

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We may share your personal information with our group affiliates and subsidiaries. Such sharing will be for our reasonable business purposes, consistent with the types of uses for which we use your personal information as described in this WiFi Security Privacy Statement. We have intra-company agreements in place designed to adequately protect personal information.

We may also share your information with third-party service providers or business partners who:

- host, store, and back-up some of our infrastructure, applications, and data held by us, including personal information (for example, by using Infrastructure as a Service or Platform as a Service);
- process your payment card information when you purchase or renew WiFi Security;
- fulfill your WiFi Security order;
- use your data for other purposes consistent with this WiFi Security Privacy Statement.

Finally, we may also disclose your personal information to third parties:

- in the event that we or our affiliates or subsidiaries contemplate or enter into a reorganization, merger, sale, joint venture, assignment, transfer, bankruptcy, or other disposition of all or any portion of our business or assets; and
- if we have a good faith belief that we are under a duty to disclose or share your personal information 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 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 organizations for the purposes of fraud and network protection.

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## **WHERE WE PROCESS YOUR PERSONAL INFORMATION**

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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 information, you hereby consent and agree to this transfer, storing, or processing. You also acknowledge that we have a legitimate interest in processing your information where the above-mentioned facilities are located.

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## **SECURITY**

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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.

We will take those steps reasonably necessary to ensure that your information is treated securely and in accordance with this WiFi Security Statement and the requirements of applicable law wherever the information is located. In order to safeguard your personal information in countries outside the European Economic Area (EEA), we have implemented reasonable and 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.

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#### **YOUR ACKNOWLEDGMENTS**

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Where you have chosen a password that enables you to use our products or services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. If you believe that your password has been compromised, please immediately notify us by contacting Customer Support.

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#### **YOUR RIGHTS**

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You have the right to opt-out of marketing-related messages from Webroot and our sharing of your personal information with affiliates, subsidiaries, and third parties for marketing purposes. 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, emailing [unsubscribe@webroot.com](mailto:unsubscribe@webroot.com), or by registering your preference on certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the contact details shown below. In addition, you may opt out of online behavioral advertising by following the links in our [Cookies Policy](#). However, we do reserve the right to continue sending you transactional messages that are related to your contractual relationship with us or to prior transactions between us.

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#### **RETENTION OF PERSONAL INFORMATION**

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We retain your Personal Information:

- for as long as your account is active or as needed to provide you with products or services or to fulfill 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 information so that we limit our ability to reasonably identify you.

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#### **PROVISIONS APPLICABLE TO CALIFORNIA RESIDENTS ONLY**

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If you are a California resident, you have a right to request certain information with respect to the types of personal information we have shared with third parties for their direct marketing

purposes, and the identities of those third parties, within the immediately preceding calendar year, subject to certain exceptions. All requests for such information must be sent to [privacy@webroot.com](mailto:privacy@webroot.com).

This same California law permits us to provide you, in response to your written request, with a cost-free means to choose not to have your information shared rather than providing the above described information. To that end, you may request that we do not disclose your personal information to unaffiliated third parties for their own direct marketing purposes by contacting us by email at [privacy@webroot.com](mailto:privacy@webroot.com).

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**PROVISIONS APPLICABLE TO CITIZENS OF EUROPEAN ECONOMIC AREA ONLY**

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You may have the right (we suggest by using the contact details below), to request, in accordance with data protection laws: access to, rectification, and erasure of your personal information; restriction of processing of personal information; objecting to certain processing of personal information; and a right to data portability.

Where any processing of personal information is solely dependent upon your consent, such as marketing to you, you have the right to withdraw such consent at any time (we suggest by using the unsubscribe link contained in the applicable marketing message, or, emailing [unsubscribe@webroot.com](mailto:unsubscribe@webroot.com)).

Where you believe that we have not processed your personal information in accordance with the applicable data protection laws, you may lodge a complaint with the respective supervisory authority/data protection regulator.

The provision of personal information by you will be for contractual, marketing, or analytical purposes as referred to above. If we do not have access to such personal information from you, then we will not be able to undertake the above types of services for you.

We may withhold information where the search for that information would require disproportionate effort or have a disproportionate effect due to, for example, the cost of providing the data, the time it would take to retrieve the data, or how difficult it may be to obtain the data requested. To exercise your rights, please contact [privacy@webroot.com](mailto:privacy@webroot.com). When we receive your requests, we may ask you to verify your identity before we can act on your request.

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**POLICY TOWARDS CHILDREN**

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We do not knowingly provide WiFi Security to children under the age of 18. If we become aware that a child under the age of 18 has provided us with personal information without verification of parental consent, we shall attempt to terminate the child's User Account as soon as possible.

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**ACCESSING, UPDATING, OR CORRECTING INFORMATION**

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You may have a right, in accordance with applicable laws, to access, update, correct, and in some cases request removal of the personal information held about you. When updating your personal information, we may ask you to verify your identity before we can act on your request. Any access request will be subject to the relevant fee, if any, to meet our costs in providing you with details of

the information we hold about you. We will comply with your request as soon as reasonably practicable and in accordance with applicable law. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations, and/or to complete any transactions that you began prior to requesting such change or deletion. Further details can be obtained by using the contact details shown below.

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#### **CHANGES TO OUR WiFi SECURITY STATEMENT**

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We reserve the right to revise or modify this WiFi Security Privacy Statement. If we do, we will post a prominent notice on our website prior to the change becoming effective. If the changes would have the effect of introducing a purpose for the use of your personal information that is inconsistent with this WiFi Security Privacy Statement, and where required by applicable law, we will use commercially reasonable efforts to either notify you or provide you with an opportunity to opt-out from us making such use. Please check back frequently to see any updates or changes to our WiFi Security Privacy Statement.

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#### **CONTACT US**

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Questions, comments and requests regarding this WiFi Security 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 WiFi Security in North America is Webroot Inc. of 385 Interlocken Crescent, Suite 800, Broomfield, CO 80021, USA. For WiFi Security outside North America, the data controller is Webroot International Limited of 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.