

Website 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 Website Privacy Statement (“**Statement**”) describes how we process and use personal data we collect from you when you visit and use our website. Information about our privacy practices with respect to the products and services can be found [here](#). Other documents, including our [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. 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. By visiting any page on this website (“**our site**”), or taking any action on our site, you are accepting and consenting to the practices described in this Statement.

INFORMATION WE MAY COLLECT AND HOW WE USE IT

Categories of information collected	Summary of Purpose of Use (see detailed table below for more information)	Sources of Personal Data
Contact information , Name, mailing address, email address, telephone number	<ul style="list-style-type: none">• Communicate with you• Provide the services.• Personalize your experience.• Secure our service and users.• Fraud prevention and legal purposes.•	<ul style="list-style-type: none">• You
Financial and transactional information. Credit card, debit card, banking or other payment information and your billing address.	<ul style="list-style-type: none">• Provide the services• Secure our Services and users• Fraud prevention and legal purposes.	<ul style="list-style-type: none">• You
Device information and identifiers. internet protocol (IP) address used to connect your computer to the internet; browser and plug-in types, versions and language; operating system information; platform type; your login information and unique device, advertising, and app identifier.	<ul style="list-style-type: none">• Provide the services.• Secure our services and users• Fraud prevention and legal purposes.	<ul style="list-style-type: none">• You.• Analytics providers• Cookie and tracking technologies.
Connection and usage data , e.g., download of trial software or service, information about your interaction with our website, such as the pages you visited on our website, products you viewed or searched for, the URLs from the websites you visit before and after navigating to our site, files you	<ul style="list-style-type: none">• Provide the services• Personalize your experience• Secure our services and users• Fraud prevention and legal purposes	<ul style="list-style-type: none">• You• Advertising providers• Analytics providers• Cookies and tracking technologies• Our affiliates

Categories of information collected	Summary of Purpose of Use (see detailed table below for more information)	Sources of Personal Data
download, domain names, landing pages, usage activity, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page content viewed and accessed, dates and times of access, pages viewed, forms you complete or partially complete, search terms, uploads or downloads, whether you open an email and your interaction with email content, access times, error logs, and other similar information.		
Other information , e.g., any other information you choose to directly provide to us in connection with your use of the Services	<ul style="list-style-type: none"> • Communicate with you • Provide the services. • Personalize your experience. • Secure our service and users. • Fraud prevention and legal purposes. 	<ul style="list-style-type: none"> • You

Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. This information may be shared internally and combined with information collected on this site. We also work closely with third parties (including, for example, business partners; subcontractors in technical, payment and delivery services; advertising networks; analytics providers; search information providers; and credit reference agencies) and may receive information about you from them. 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).

Purposes of Use
<p>Communicate with you, for example:</p> <ul style="list-style-type: none"> • Responding to your requests for information and provide you with more effective and efficient customer service and technical support • To provide you with marketing materials (with your consent). • In accordance with applicable legal requirements, contacting you by email, postal mail, phone, or other means for marketing purposes. • To allow you to report a problem with the website • To allow you to complete a form on the website • 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; • To provide information on changes to Products and Services, Terms and Conditions and Policies

Purposes of Use

- To provide you, or permit selected third parties to provide you, with information about software or services we feel may interest you (with your consent);
- To communicate with you about our events, surveys, contests, sweepstakes, and other promotions (if you have not objected to receiving marketing communications);
- To give you the opportunity to enter a competition or promotion or complete a survey
- To allow you to participate in in discussion boards or other social media functions on website.

Provide the Services, for example:

- Site Registration
- To complete and fulfill your purchase, for example, to process your payments, communicate with you regarding your purchase, provide you with related customer service and establish and manage your account.
- To notify you about changes to our service and changes to our terms and conditions and policies.
- To provide technical and other support services.
- Engaging in analysis, research, and reports to better understand how you use the Services, so we can improve them
- Understanding and resolving crashes and other issues being reported
- Process purchases
- Record keeping and billing

Personalize your experience, for example:

- Customizing the content on the Services based on your usage.
- To improve our site to ensure that content is presented in an appropriate manner for you and your computer, as well as improve product and service offerings
- administer our site for internal operations, including but not limited to troubleshooting, data analysis, testing, research, statistical and survey purposes
- To personalise your experience to allow you to participate in interactive features of our service, when you chose to do so
- To measure or understand the effectiveness of our advertising to you, and deliver, or allow our service providers to deliver relevant advertising to you, including interest-based advertising (otherwise known as “online behavioural advertising”)
- To make suggestions and recommendations to you and other users of our site about software and services that may interest you or them.

Secure our Services and users, for example:

- Monitoring, preventing, and detecting fraud, such as through verifying your identity
- Combatting spam or other malware or security risks
- Monitoring, enforcing, and improving the security of our Services

Fraud detection and prevention, defending our legal rights and compliance with the law, for example:

- Complying with any applicable procedures, laws, and regulations where it is necessary for our legitimate interests or the legitimate interests of others
- Establishing, exercising, or defending our legal rights where it is necessary for our legitimate interests or the legitimate interests of others (e.g., to enforce compliance with our Terms of Use, Privacy Policies, or to protect our Services, users, or others)
- In order 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.

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.

COOKIES AND DO NOT TRACK

Our site uses cookies to, among other things, operate, work more efficiently, and provide analytic information and advertising. For detailed information on the categories of cookies we use and the purposes for which we use them, see our [Cookies Policy](#). Please note that our websites may not recognize or take action in response to Do Not Track and similar signals from browsers.

For information on targeted advertisements and our analytics providers and how to opt out, please see our [Cookies Policy](#).

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.

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 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;
- third-party customer support providers;

- advertisers, marketers, and advertising and marketing networks that use the information to select and serve relevant ads to you and others on our site, on other sites, and in apps, as permitted under applicable law and in accordance with your communication preferences; and
- analytics and search engine providers that assist us in the improvement and optimization of our site.

Finally, we may disclose your personal information:

- 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 information as part of that deal;
- 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 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.

PLEASE NOTE THAT ANY INFORMATION AND MATERIAL YOU POST OR DISCLOSE ON MESSAGE BOARDS, FORUMS, ONLINE CHAT PROGRAMS, PROFILE PAGES, AND BLOGS WILL BECOME PUBLIC INFORMATION AND MAY BE AVAILABLE TO USERS AND TO THE GENERAL PUBLIC. WE URGE YOU TO BE VERY CAREFUL WHEN DECIDING TO DISCLOSE YOUR PERSONAL INFORMATION, OR ANY OTHER INFORMATION, ONLINE.

WHERE WE PROCESS YOUR PERSONAL INFORMATION

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.

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.

YOUR ACKNOWLEDGMENTS

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our site, 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 us in accordance with the "Contact Us" section below.

SECURITY

Unfortunately, the transmission of information via the internet is not completely secure. Although we will aim to protect your personal information, we cannot guarantee the security of your data transmitted to our site, and any transmission is therefore at your own risk.

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.

LINKS TO OTHER SITES

Our website may contain links to other websites, including the websites of our third-party networks and advertisers. If you follow a link to any of these websites, please note that these websites have their own privacy policies and information practices for which we are not responsible. Please check these policies before you submit any Personal Data to these websites.

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 or submit a ticket to customer support found [here](#) at or contact customer support on 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 , or by submitting a ticket to customer support found [here](#) or by 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](#).

CHILDREN

Webroot does not knowingly collect or distribute any Personal Data from children under 13 years old. If a child under 13 has provided Webroot with Personal Data, the parent or guardian of that child should contact Webroot immediately at [t.privacy@webroot.com](mailto:privacy@webroot.com) to delete this Personal Data.

RETENTION OF PERSONAL INFORMATION

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 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 Privacy Statement will likely change. By continuing to access our Websites you acknowledge and accept the Privacy Statement as revised. We encourage you to periodically review this Privacy Statement to stay informed about how we collect, use and disclose Personal Information. If we update this Privacy 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 Privacy Statement, you will be provided with appropriate notice in accordance with legal requirements. At such time, your 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

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

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.