

## Webroot WiFi Security Privacy Statement

January 2020

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**”) and describes how we process and use Personal Data we collect from you when you visit and use our WiFi Security. 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**”).

This WiFi Security Privacy Statement describes Webroot’s policy regarding the collection, use and disclosure of your Personal Data 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 Data practices.

### SUMMARY

We **do not** collect or log any of your 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, including troubleshooting any issues WiFi Security may have. In the event your WiFi Security app crashes, anonymous logs of what happened on the device for a brief period prior to the crash may be logged for troubleshooting purposes only, which may include some downloaded data and DNS queries.

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

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
<b>Contact and account registration information</b> , Name, billing address, business type, email address, username	<ul style="list-style-type: none"><li>• Communicate with you</li><li>• Provide the services.</li><li>• Personalize your experience.</li><li>• Secure our service and users.</li><li>• Fraud prevention and legal purposes.</li></ul>	<ul style="list-style-type: none"><li>• You</li><li>• Our affiliates</li></ul>
<b>Financial and transactional information</b> . Credit card, debit card, banking or other payment information. Date on which payment was made and your expiration date. A generic number (the <b>order ID Number</b> ) in order to link this with your Email Address/User Account. A transaction receipt.	<ul style="list-style-type: none"><li>• Provide the services</li><li>• Secure our Services and users</li><li>• Fraud prevention and legal purposes.</li></ul>	<ul style="list-style-type: none"><li>• You</li><li>• Third-party payment processors who collect this information on our behalf and who also have an independent relationship with you.</li></ul>

Categories of information collected	Summary of Purpose of Use (see detailed table below for more information)	Sources of Personal Data
<p><b>Connection and Usage Data</b> WiFi Security Data and Logs. Minimal usage statistics. 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. Anonymous logs of what happened on the device, which may include some downloaded data and DNS queries.</p>	<ul style="list-style-type: none"> <li>• Provide the services</li> <li>• Secure our services and users</li> <li>• Fraud Prevention and legal purposes</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third-party service providers who collect this data on our behalf</li> </ul>
<p><b>Other information</b>, e.g., any other information you choose to directly provide to us in connection with your use of the Services</p>	<ul style="list-style-type: none"> <li>• Communicate with you</li> <li>• Provide the services.</li> <li>• Personalize your experience.</li> <li>• Secure our service and users.</li> <li>• Fraud prevention and legal purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>

Purposes of Use
<p><b>Communicate with you, for example:</b></p> <ul style="list-style-type: none"> <li>• Responding to your requests for information and provide you with more effective and efficient customer service and technical support</li> <li>• Providing you with transactional updates and information about the Services (e.g., inform you about updates to our Services, information about your account, or information about transactions that you conduct on the Services)</li> <li>• To provide you with marketing materials (with your consent).</li> <li>• In accordance with applicable legal requirements, contacting you by email, postal mail, phone, or other means for marketing purposes.</li> <li>• To allow you to report a problem with the WiFi Security</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 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 provide information on changes to WiFi Security, Terms and Conditions and Policies</li> <li>• To comply with and perform other activities consistent with this WiFi Security Privacy Statement.</li> </ul>
<p><b>Provide the Services, for example:</b></p> <ul style="list-style-type: none"> <li>• Account Registration</li> </ul>

## Purposes of Use

- Processing and fulfilling your requests using the WiFi Security (including purchase, download and renewals)
- To provide customer support
- To check for and distribute updates to the WiFi Security
- Engaging in analysis, research, and reports to better understand how you use WiFi Security, so we can improve them
- Understanding and resolving crashes and other issues being reported
- Process purchases
- Record keeping and billing
- To develop new security products and services and to market related products and services

*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.*

### **Personalize your experience, for example:**

- To improve our WiFi Security 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 WiFi Security for internal operations, including but not limited to troubleshooting, data analysis, testing, research, statistical and survey purposes
- To allow you to participate in interactive features of our WiFi Security 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 WiFi Security software and services that may interest you or them.
- To conduct research and analysis such as to improve our products and services
- To analyse how our customers use our security products and services
- To develop aggregate and non-identifiable statistics

### **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.

WiFi Security does not collect your browsing activity, downloaded data (or shared or viewed), DNS queries, or IP addresses. However, if your WiFi Security app crashes, anonymous logs of what happened on the device for a brief period prior to the crash, which may include some downloaded data and DNS queries, may be logged for troubleshooting purposes only, in order to identify the cause of the crash.

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 product or services, internal record-keeping and administrative purposes and to operate, maintain and improve the website or portal.

## **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 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 Data as described in this WiFi Security Privacy Statement. We have intracompany 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 Data (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;
- fulfil your WiFi Security order;
- use your data for other purposes consistent with this WiFi Security Privacy Statement.

Finally, we may also disclose your Personal Data 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 in which case we or our affiliates or subsidiaries may disclose your Personal Data as part of that deal; and

- 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 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.

## **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 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.

## **YOUR ACKNOWLEDGMENTS**

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.

## **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.

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 Data 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.

## **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, 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.

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](#) or 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 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 Data without verification of parental consent, we shall attempt to terminate the child's User Account as soon as possible.

## **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 information so that we limit our ability to reasonably identify you.

## **CHANGES TO OUR WIFI SECURITY STATEMENT**

As laws and best practices evolve, this WiFi Security Privacy Statement will likely change. By continuing to access our WSAT Service you acknowledge and accept the WiFi Security Privacy Statement as revised. We encourage you to periodically review this WiFi Security Privacy Statement to stay informed about how we collect, use and disclose Personal Data. If we update this WiFi Security 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 WiFi Security Privacy Statement, you will be provided with appropriate notice in accordance with legal requirements. At such time, your continued use of WiFi Security 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 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**