



WSA Privacy Statement

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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 WSA Privacy Statement (the “**WSA Statement**”) applies to our Webroot SecureAnywhere products and services that you purchase, download, access, install or use (“**WSA Offerings**”).

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, describe Webroot’s personal information practices as such practices are described therein.

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By purchasing, downloading, accessing, installing or using the WSA Offerings you are accepting and consenting to the practices described in this WSA Statement.

INFORMATION WE MAY COLLECT

We may collect and process the following data about you:

Personal Information you provide to us. You may give us information about you by registering the WSA Offerings or your account in relation to the WSA Offerings, or when you contact us (such as by phone, email or chat). The information you give us may include:

- your shipping address, billing address, business type, and other information in connection with your transaction;
- product and transaction information (including the WSA Offering keycode, the version of the WSA Offering used, and purchase history);
- information used to verify that you are who you say you are (e.g., user name and security code); and
- information provided to the Storage Services (as defined below).

Information we collect automatically. When you install or start using the WSA Offering, there is certain information which we will collect automatically, such as:

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- keycode, license, and account information (including the duration of your subscription to the WSA Offering and the version of the WSA Offering that you are using, as well as information about your use of the service, such as features utilized and session length);
- device information (including information on your operating system, MAC address, device or machine ID, logged-in user, registry keys, language and other characteristics);
- application, program, and file information (including information on the existence, characteristics, and behavior of your files and applications [e.g., browser type, applications using ports, active directory identifiers, and other data pertaining to file path and folders] and determinations on the security status of your files and applications, such as bad, good, suspicious, or unknown). Additionally, if Webroot suspects that a file is potentially malicious and our systems have not yet classified it as good or bad, Webroot may collect copies of it for purposes of malware research and analysis, but see full explanation and opt out below under *How We May Use Your Information*;
- network and internet information (including IP addresses, URLs or domain names of websites visited, applications or files that attempt to access your network, temporary internet files, and active directory identifiers); and
- location information (including information on your geolocation and Wi-Fi access points), which, among other things, helps us analyze suspected DDoS attacks; and
- Mobile Users: mobile carrier information.

Information we collect from other sources. We may collect information about you from the internet or other companies.

HOW WE MAY USE YOUR INFORMATION

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

Information you give to us. We may use this information:

- to register your account with us;
- to enable you to purchase and download the WSA Offering;
- to process and renew your orders;
- to provide customer support;
- to communicate with you regarding the WSA Offering;
- 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 improve our products and services;
- to personalize and manage our relationship with you;
- to notify you about changes to our service and offerings, and changes to our terms and conditions and policies;
- to comply with applicable legal requirements, agreements, and policies; and
- to comply with and perform other activities consistent with this WSA Statement.

Information we collect about you automatically. We will use this information:

- in our efforts to protect you and others from viruses, malware, and certain other IT security threats;
- to check for and distribute updates to WSA Offerings;
- to predict and protect against certain current and future IT security threats and vulnerabilities;
- 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 understand how we can improve 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 which are used for research, publicity, marketing, promos, and other commercial purposes; and
- for other purposes consistent with this WSA Statement.

If you are using version 8 or higher of the WSA Offering, then it may contain features that allow the service to upload potentially malicious files that our systems have not yet classified. These files are not shared with or sold to third parties: they are processed by Webroot solely to perform malware/threat research and analysis for purposes of identifying new malware/threats and their sources to improve Webroot's services. TO ELIMINATE THE POSSIBILITY OF IDENTIFYING YOU, WEBROOT ANONYMIZES THE LINK BETWEEN DEVICE AND USER DATA (SUCH AS MACHINE ID) AND THE POTENTIALLY MALICIOUS FILES WHEN UPLOADED TO WEBROOT'S DATABASES. WHILE THIS FEATURE IS ONLY USED FOR THE PURPOSES DESCRIBED ABOVE, IF YOU WISH TO TURN THIS FEATURE OFF, YOU MAY DO SO BY FOLLOWING THE INSTRUCTIONS [HERE](#).



Information we collect from other sources. We may combine information we collect from the internet or other companies with personal information you give to us and other information we collect about you. We may use this information and the combined information for the purposes set forth in this WSA Statement. For example, we may use data collected from Webroot's BrightCloud Threat Intelligence Services to categorize the relative safety or security of URLs and use this data to attempt to prevent you from visiting such URLs while using WSA Offerings. Information automatically collected from WSA Offerings is also used to help us and our BrightCloud Threat Intelligence Services categorize URLs.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information 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 information as described in this WSA Statement.

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 services);
- process your payment card information when you purchase or renew a subscription to the WSA Offering;
- process, fulfill, and ship copies of the WSA Offering to you;
- provide customer service agents and software or other tools to those agents so that they may resolve customer support issues (for example, by using third-party remote log-in software that allows us or our third-party customer service agents, with your permission, to troubleshoot problems) or discuss our products and services with you;
- provide analytics services to help us understand how you and other customers use the WSA Offering, including, for example, [Google Analytics](#) (follow the instructions [here](#) to opt out of Google Analytics) and [Flurry Analytics](#) (follow the instructions [here](#) to opt out of Flurry Analytics);
- to enable third parties from whom we sublicense features or components for the WSA offering to provide such products or services to you; and
- for other purposes consistent with this WSA Statement.

In addition, we may share some personal information with certain third parties and their partners, to the extent necessary, for their use in providing threat protection services to you and other customers and in protecting the safety and integrity of their network or systems. These third parties and partners may associate such personal information with you or your device when you visit websites owned or operated by or on behalf of those third parties and partners.



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, 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 the terms and conditions governing one or more WSA Offerings, 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 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. 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 information 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, which ensure that your personal data is processed under established European data protection controls and acknowledge your rights under such relevant data protection regulations.

YOUR ACKNOWLEDGMENTS

You acknowledge and agree that certain versions of the WSA Offerings have features like online data storage, synchronization, and file sharing (“**Storage Services**”). However, other than for such purposes and as described in this WSA Statement, we do not monitor any personal information contained in the Storage Services. You also agree not to provide any sensitive personal information via such Storage Services or the WSA Offerings.

Where we have given you (or 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 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.

YOUR RIGHTS

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, 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 messages that are related to your transactions with us.

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 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 name, email address, and transactional data (e.g., license key), so that we limit our ability to reasonably identify you.

PROVISIONS APPLICABLE TO CALIFORNIA RESIDENTS ONLY

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.

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.

If you are a California resident under 18 years of age and a registered user of our services, you may request that we remove content and information that you post on our services. To obtain removal of such content and information, please send us an email to



privacy@webroot.com with a short description of the content or information you would like to have removed. Please note that such a request does not necessarily ensure complete or comprehensive removal of content posted by you, since the content and information may remain in our databases, may remain visible in a manner that does not identify you, or may have been re-posted by another user.

PROVISIONS APPLICABLE TO RESIDENTS OF EUROPEAN ECONOMIC AREA ONLY

You 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, you have the right to withdraw such consent at any time (we suggest by emailing unsubscribe@webroot.com).

Where you believe that we have not processed your personal information in accordance with 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.

ACCESSING, UPDATING, OR CORRECTING INFORMATION

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 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.

CHANGES TO OUR WSA STATEMENT

We reserve the right to revise or modify this WSA Statement. If we do, we will post a prominent notice on our website prior to the change becoming effective. We may also send you an email. If the changes would have the effect of introducing a purpose for the use of your personal information that is inconsistent with this WSA 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 WSA Statement.

CONTACT US

Questions, comments and requests regarding this WSA Statement are welcomed and 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 purchase of WSA Offerings in North America is Webroot Inc. of 385 Interlocken Crescent, Suite 800, Broomfield, CO 80021, USA. For purchases of WSA Offerings 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.