### **Our Privacy Policy**

We (AVG Technologies NV and our affiliates) last changed our privacy policy on October 15th, 2015. If you're interested to see what changed, please <u>click here</u>.

### Why do you collect my data?

It's simple. We provide products and services to help you secure your data, devices, and personal privacy. We use data to improve those products and services; provide support; send notifications, offers, and promotions; and to make money from our free offerings so that we can continue to offer them for free.

We use data that can identify you, called personal data, to:

- Enable you to purchase and download products, obtain access to services and engage in offered activities;
- Provide you information about virus alerts, new and upgraded products and services, and other information you have requested;
- Provide you with service messages to your device;
- Alert you if we determine that your files, applications or emails are potentially malicious;
- Send you newsletters, informative emails or other information regarding AVG; and
- Provide you special opportunities, including offers relating to thirdparty products and services

We use data that does not identify you, called non-personal data, for lots of purposes, including to improve our products and services and to help keep our free offerings free. In particular, we may use non-personal data to build anonymous data profiles and provide segmented marketing, generate aggregate statistical information, and to improve and administer our current products and create new products.

You can be assured that we protect the information we collect. By using our products or services, you agree to the collection, use and sharing of your

data in accordance with this Privacy Policy. Unless the specific product states otherwise, all AVG products and services are included under this Privacy Policy.

If you are really interested in this privacy stuff, we've put together <u>a few</u> videos and to help explain what we do, why we do it, and how.

#### How do you collect my data?

We collect information in three ways: when you provide us information, automatically, when you use our website or products, and when provided to us by third parties. Much of our automatic collection is done through the use of things like cookies and tracking beacons. If you are curious what is meant by a cookie or a tracking beacon, please <u>click here</u>. You can find comprehensive information on how we use cookies and third-party tracking and analytics services <u>here</u>. Additionally, if you have the option enabled, we may scan web traffic (including encrypted traffic) for known virus threats.

# What do you collect that can identify me?

Like many companies, some of the information we collect, known as personal data, can identify you. An example of personal data might be your name or email address.

Some personal data we collect only when you provide it to us. This information may include your name, address, email address, telephone number, and if you pay by credit card, your payment information. This may happen when you:

- Create a user account, place an order, or register a product;
- Request product support or other services;
- Request information about products; or
- Participate in surveys.

Some personal data we collect automatically when you use our website or products. This information may include some or all of the following types of information:

- Your Internet Protocol ("IP") address;
- User and account names and related data;
- Phone number;
- SIM (Subscriber Identification Module) card number;
- Device ID numbers, including Machine ID, IMEI and/or MEID;
- AVG product license and identification numbers; and
- Geographic location based on GPS/Wi-Fi/communications network local information.

Unless we need the data to retain its personally identifiable characteristics, we anonymize the data we collect and store it in a manner that does not identify you. For instance, when we collect your IP address, we may anonymize your IP address by obfuscating the last group of digits (e.g., changing 192.168.1.1 to 192.168.1.XXX).

# What do you collect that cannot identify me?

We collect many types of data, called non-personal data that does not personally identify you. While we cannot list out each and every type of nonpersonal data that we collect, we've tried below to give you a general understanding of what types of non-personal data we collect and examples to help you see what we mean.

We collect non-personal data to improve our products and services, including:

 data concerning potential malware threats to your device and the target of those threats, including copies of files or emails marked as potential malware, file names, cryptographic hash, vendor, size, date stamps, associated registry keys, etc.;

- information about how you use our products and their features, including information about your particular device, installation and uninstallation rates, language, technical parameters and manufacturer of a device, device security information (password attributes, encryption level), etc.; and
- information about where our products and services are used, including approximate location, zip code, area code, time zone, and the URL you came from to reach our products.

We collect non-personal data to make money from our free offerings so we can keep them free, including:

- Advertising ID associated with your device;
- Browsing and search history, including meta data;
- Internet service provider or mobile network you use to connect to our products; and
- Information regarding other applications you may have on your device and how they are used.

Sometimes browsing history or search history contains terms that might identify you. If we become aware that part of your browsing history might identify you, we will treat that portion of your history as personal data, and will anonymize this information. We may also aggregate and/or anonymize personal data we collect about you. For instance, although we would consider your precise location to be personal data if stored separately, if we combined the locations of our users into a data set that could only tell us how many users were located in a particular country, we would not consider this aggregated information to be personally identifiable.

#### Do you share my data?

Yes, though when and how we share it depends on whether it is personal data or non-personal data. AVG may share non-personal data with third parties and may publicly display aggregate or anonymous information.

We do not sell or rent your personal data to third parties.

We may share certain personal data (as described below) with:

• Any of our affiliated AVG companies;

AVG is a global company, comprising many companies in many offices around the world. In order to do business around the globe, we may share your personal data across our offices and companies which may be in countries with different laws regarding the collection and use of personal data than the country we collected it from.

• Search providers;

Certain of our search providers may require us to share your full IP address with them in order to fulfill your search requests. Please note that the search providers have their own privacy policies that govern the privacy of these requests. We encourage you to read these privacy policies before deciding to use these services.

• Selected AVG resellers, distributors and other partners performing services on our behalf.

We may share some of your personal data, such as your email address, with certain selected resellers, distributors and other partners to enable them to contact you on our behalf about products, services or offers we believe are important to you or your business, to fulfill any terms under your licensing and service relationship with AVG, or to provide you local technical and customer support.

Lastly, we may share your personal data:

- when necessary to deliver the product or service you require such as with a payment card provider who we use to process your credit card transaction;
- when authorized by law or necessary to comply with a valid legal process;
- when required to protect and defend the rights or property of AVG, including the security of our products and services;
- when necessary to protect the personal safety, property or other rights of the public, AVG or its customers or employees; or

• in connection with a sale of all or part of our business.

If we are legally compelled to disclose your personal data to a third party, we will use commercially reasonable efforts to notify you in advance of a disclosure unless legally prohibited. If we are involved in a merger, acquisition or asset sale, we will abide by this Privacy Policy, and any affected users will be informed if we transfer any personal data to a third party or if personal data becomes subject to a different privacy policy as a result.

### What rights do I have over my data?

You have the right to ask us about the personal data we process about you, the purpose and nature of the processing, and to provide information on who we share it with.

You have the right to request that we update, correct, or delete (assuming that this does not impact the services we are providing to you) your personal data at any time. Please note that we may reject requests which risk the privacy of others or are unreasonable or repetitive, or would require disproportionate effort. Unless you request us to delete your data, please note that we may keep your personal data for one year after you stop being a customer (but we typically keep your personal data no longer than is reasonably necessary given the purposes for which the data was collected).

You have the right to opt out of the use or collection of certain data by us or by third parties, including personal data and non-personal data, by following the instructions <u>here</u>.

You have the right to opt-out of receiving our email newsletters, bulletins, or other information at any time by following the instructions <u>here</u> or the relevant unsubscribe process outlined in the applicable email or newsletter. Please be aware that our emails may include important or useful information about your AVG Products, including information about your license number or the status of your orders or accounts. You have the right to expect us to protect your personal data and keep it safe. We work hard to protect AVG and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of the information we hold. In particular:

- We abide by this Privacy Policy at all times with respect to all data that we collect from you;
- We limit the use and disclosure of your personal data, and work to ensure that anyone with whom we share such information treats that information with the privacy and security it deserves; and
- We have put in place industry-accepted physical, technical and administrative practices to safeguard and secure the information we collect.

## What changes have you recently made?

We reserve the right to change this Privacy Policy at any time, and will indicate the date the Privacy Policy was most recently updated. If there have been significant changes, we will highlight any such changes, and will attempt to directly alert you when possible. We will also keep prior versions of this Privacy Policy in an archive for your review.

Changes to our privacy policy since the latest version include:

• We've changed how we present our privacy policy to make it easier to understand and read.

Follow <u>this link</u> to download the current privacy policy or access previous versions of the AVG Privacy Policy.

#### How can I contact you?

If have any questions about this policy or any of the above, please email us

at <u>privacy@avg.com</u> or see instructions in the product or service you are using. You may contact us by mail at:

AVG Netherlands BV Gatwickstraat 9-39, 1043GL Amsterdam The Netherlands

## Is there anything else I need to know?

Periodically, our site or products may contain links to and from websites or other external destinations managed by third parties. If you follow a link to any of these destinations (like offers on mobile app stores etc.), please note that those sites have their own privacy policy. When you are on those sites you are subject to those policies, and should therefore read and understand them before you submit any personal data to those sites.

We may also link to co-branded websites or products that are maintained by AVG Technologies and one or more of our business partners. Please note that these co-branded websites and products may have their own privacy policy, which we encourage you to read and understand.