



## **Privacy Policy**

Last update: 1<sup>st</sup> July 2013. Summary of changes can be consulted at the bottom of this Privacy Policy.

### **Scope**

The aim of this Privacy Policy is to provide an overview on the privacy practices exercised by AVG with respect to the [www.avg.com](http://www.avg.com) website ("Site") and any product and/or services AVG may offer to you ("AVG Products"), unless terms and conditions accompanying such AVG Products indicate otherwise.

### **Commitment to Privacy**

As a security and other software producer, AVG Technologies knows that you care about how your Personal data and information is used and shared. AVG is in the security business to protect you. In order to do our job, at times we may need access to certain data on your PC, tablet, mobile phone or other applicable device. We respect your right to privacy. We want to make sure that you understand the type of Personal data and information we collect about you, how it is used and the safeguards we use to protect it. For the purposes of this Privacy Policy, AVG Technologies shall mean AVG Technologies NV or any other company controlled by, controlling or under common control with AVG Technologies.

### **What Information Does AVG Technologies Collect?**

The type of Personal data and information that we collect and retain depends upon your interaction with our Site and/or our AVG Products. Here is a short overview of the two main types of interactions.



### **Information You Give Us**

We collect the Personal data and information you provide to us on our Site or through our AVG Products, including your name, address, email address, telephone number, and if you pay by credit card, your account information. This happens when you:

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

Our AVG Products can collect information about your PC, tablet, mobile phone or other applicable device, about files stored or applications installed and sites you have accessed when they identify threats or potential threats. This information, with your consent is transmitted back to AVG. It is possible that on rare occasions this may provide Personal data and information. Be assured we always treat such information in accordance with this Privacy Policy and applicable laws.

You have the final decision on whether to proceed with any activity that requests Personal data and information.

### **Information Collected and Stored Automatically**

When you interact with AVG Products or Sites we may maintain a partial or full record about some or all of the following types of information:

- Your Internet Protocol ("IP") address or other technical information such as a referring web site, if any, and the path you take through AVG Technologies Sites when you visit us online
- The date and time, the internet address of the website from which you link directly to our website
- The name of the file or the words you search, and the browser you use to access our website



- Information about malicious applications, files and other potential threats on your PC, tablet, mobile phone or other applicable device, their behavior and origin
- Files and the content of files that contain threats or potential threats
- Information about your device (PC, tablet, mobile phone or other applicable device) like device ID, device name, third party applications, types and number of files and programs on such device, and device settings. Specifically for mobile phones we may also collect serial numbers of SIM cards, serial numbers of the phone, third party apps installed on the device, installation and uninstallation rates, language and manufacturer of the device, screen size and model of the device, the location of the device and the mobile network (mobile carrier) you use but not the phone number.

The information collected and stored automatically by our Site is used to measure the number of visitors to it and to identify system performance or for server issues. We also use this information to help us expand the coverage of our Site and to make it more useful.

If you are enrolled in the AVG Rewards program, please see our [AVG Rewards Policy Addendum](#) for the complete list of information collected by the program.

## **Do We Use Cookies?**

You can find comprehensive information on how AVG's website uses cookies [here](#).

## **How Do We Use the Information We Collect?**

The Personal data and information we collect is generally used to help us develop the best protection and performance for you, process your requests and transactions, to provide you with high quality service, to tell you about opportunities we think will be of interest to you, to customize your experience on our Site and to understand your needs so that we may provide you with the



most suitable products and services. For example, we may use your Personal data and information to help us:

- Provide you with information about virus alerts, product upgrades, new products, services, research on future product ideas or improvements
- Send newsletters, informative e-mails or other information which has the nature of business announcements
- Create content that is relevant to you
- Provide you with special offers that may be of interest to you, including offers relating to third party products and services
- Assist us in creating better, customized products and services to meet your needs
- Allow you to purchase and download products, obtain access to services or otherwise engage in activities you select
- Help you quickly find software, services, or product information important to you
- Allow you to participate in interactive features of our service, when you chose to do so
- Notify you about changes to our service
- In case your files, applications or emails are malicious, potentially malicious or spam.

## **With Whom Do We Share Your Information?**

### **AVG Technologies Worldwide Offices**

Since AVG Technologies is a global company, we provide information on users of AVG Products to our worldwide offices (subsidiaries and affiliates) which are listed at [www.avg.com/contacts](http://www.avg.com/contacts). The Personal data and information that you have provided to us may be made accessible to these AVG Technologies offices for customer relationship management and marketing purposes.

### **Third Parties**

AVG Technologies does not sell or rent your Personal data and information to third parties. AVG, like all major organizations, uses a range of third parties to provide services to AVG and to you – either directly or indirectly. All of these companies are required to comply with our data privacy and information security policies and we aim that they do not compromise your Personal data and information.



We may share your Personal data and information if we believe in good faith that such disclosure is: a) authorized by law or necessary to comply with a legal process or to deliver the product or service you require; b) in response to legal claims; c) required to protect and defend the rights, property or legitimate interests of AVG Technologies; d) necessary to protect personal safety, property or other rights of AVG Technologies and its customers or employees; or e) an integral part of a sale of all or part of our business.

If legally compelled to disclose your information to a third party, we will use commercially reasonable efforts to notify you in advance of a disclosure unless legally prohibited.

#### **Selected Partners, Distributors and Resellers**

We may share your Personal data and information, such as your e-mail contact, with selected AVG Technologies partners, distributors and resellers. Some of them may contact you, either on our behalf or for their own account, about products, services or offers that we believe are important to you or your business, or to fulfill any terms under your licensing and service relationship with AVG, and to provide you a local technical and customer support. If you are using any AVG Product with search functionality, we may share your IP address with search providers. Please note they may have their own privacy policy with which you should familiarize yourself.

#### **Rights and Responsibilities**

If you have given your Personal data and information to AVG Technologies for the purpose of providing you with products or services, you have the right to ask us to advise you of the scope of information AVG Technologies processes about you, the purpose and nature of the processing, and information on who we share it with.

If you have given us your Personal data and information, you can also request to update, correct, or delete (assuming that this does not impact the services we are providing to you) it at any time. Importantly, in addition you can opt out of marketing contact upon request.

You can do any of the above by emailing [privacy@avg.com](mailto:privacy@avg.com) or see instructions in the AVG Product.

While we will strive to accommodate your requests, we may reject requests which risk the privacy of others, are unreasonable or repetitive, require disproportionate technical effort (such as



developing new systems or fundamentally changing an existing business practice), or would be extremely impractical. Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of these reasons, after information is deleted from our services, we may not immediately be able to remove residual copies from our active servers and may not delete information from our backup systems.

### **AVG Update Bulletin and Other Communications**

Some AVG Products enable AVG to transmit product and important service messages to your PC, tablet, mobile phone or other applicable device when you are connected to the AVG Server. For the purposes of this Privacy Policy an AVG Server means any AVG Products related server operated by any company from the AVG group of companies.

If you do not wish to continue receiving our e-mail newsletters, bulletins, or other information from AVG Technologies, you can opt-out at any time by responding to any e-mail you receive from us and writing the word "unsubscribe" in the subject line of the response, or you could unsubscribe by following the relevant unsubscribe process outlined in respective email or newsletter. Please be aware that our e-mails may include important or useful information about your AVG products, including information about your License Number or the status of your orders or accounts.

### **Links to Other Companies**

Periodically, our Site or our Products may contain links to and from websites or other external destinations of our business partners, distributors, resellers, advertisers or other third parties. If you follow a link to any of these websites or any other external destination (like offers on mobile app stores etc.), please note that these websites and destination have their own privacy policy which you should read before you submit any Personal data and information.



## **Co-branded Websites**

We may also link to co-branded websites that are maintained by AVG Technologies and one or more of our business partners.

## **Security**

AVG Technologies is committed to maintaining the security of information under our control. We have taken security measures, consistent with best industry practices, to protect your Personal data and information. To prevent unauthorized access, maintain data accuracy and ensure correct use of information, we have put in place industry-accepted physical, technical and administrative practices to safeguard and secure the information we collect.

## **Changes of Privacy Policy**

We reserve the right to change this Privacy Policy at any time. However, we will alert you that changes have been made by indicating at the top of the Privacy Policy the date it was last updated.

## **Contact Us**

If you have any questions or suggestions regarding our Privacy Policy, please email us at [privacy@avg.com](mailto:privacy@avg.com)

On 1<sup>st</sup> July 2013, we made an update to this Privacy Policy. The main adjustments made are:

- 'Last update' moved to top of the policy and inclusion of summary of changes made
- Change in use of terminology from a mix of usage including personal data and personally identifiable information (PII) to single usage of Personal data and information (PDI)
- Merger of AVG Privacy Policy and 'AVG Mobilation' Privacy Policy
- Expansion of transparency of data collected – e.g. increased granularity
- Clarification of data subject rights – grouping and reordering into a new Rights and Responsibilities section



- Inclusion of statement to inform data subjects about third party access requests.

Follow [this link](#) to access previous versions of the AVG Privacy Policy.