

# Our Privacy Policy

Last modified: December 12th 2014. Summary of changes can be consulted at the bottom of this Privacy Policy.

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The aim of this Privacy Policy is to provide an overview on the privacy practices exercised by AVG with respect to the websites that AVG operates, including the [www.avg.com](http://www.avg.com) website (each, a "Site") and any product and/or services AVG may offer to you ("AVG Products"), unless terms and conditions accompanying such AVG Products indicate otherwise. If you are using AVG PrivacyFix, please note that the addendum located [here](#) will apply to your use of AVG PrivacyFix.

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## Commitment to Privacy

AVG Technologies provides products and services including Internet security, performance optimization, and personal privacy and identity protection, and we know that you care about how your information is used and shared. AVG is in the online security business to help protect you. 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 information we collect about you, how it is used and the safeguards we use to protect it. For purposes of this Privacy Policy, AVG or AVG Technologies shall mean AVG Technologies NV or any other company controlled by, controlling or under common control with AVG Technologies (each, an "Affiliate").

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## What Information Does AVG Technologies Collect?

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The type of information that we collect and retain depends upon your interaction with our Site and/or our AVG Products. In general, there are two different categories of information we may collect:

### Non-Personally Identifiable Information

Non-Personally Identifiable Information ("NPII") refers to information that cannot be used to identify a specific person. The NPII AVG may collect include, without limitation, information

about AVG Products and their installed features, data concerning potential malware threats to your device and the target of those threats, including file names, cryptographic hash, vendor, size, date stamps, information about your devices checkpoints, which may include path, file and application names, copies of applications that are deemed malicious or infected including information on behavior of such applications, their settings and configurations, such as associated registry keys, the date and time, the internet address of the website from which you link directly to our Site, the name of the file or the words you search, and the browser you use to access our Site, type of device, advertising ID and the mobile network (mobile carrier) you use, third party software installed on a device and related settings, installation and uninstallation rates, language, technical parameters and manufacturer of a device, device security information (password attributes, encryption level). AVG collects NPPI and shares them with its Affiliates when you use our AVG Products and when you visit the Site. This is captured via a standard "cookie", see our Cookie Statement.

We may gather certain information automatically (when you use our AVG Products or visit our Sites); if this data is classified as PII (except and as described below), we will anonymize this data to remove personally identifiable information during or after the collection process, and store it in a database. Any data, including PII, that we have anonymized in this fashion will be considered NPPI for the purposes of this Privacy Policy.

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

AVG may use the NPPI for the purposes of building anonymous data profiles and/or sharing with our partners. AVG may retain this data for a period of up to five years. We also use NPPI in a limited fashion for the administration and operation of our Site, and to generally improve the overall quality of experience with the information we provide on our Site. AVG may share NPPI or anonymized data with third parties in order to improve our AVG Products and your experience using them. By visiting our Site or installing and using our AVG Products, you hereby agree with our collection and use of NPPI as outlined in this Privacy Policy.

### **Personally Identifiable Information**

Personal data and information ("Personal Identifiable Information" or "PII") refers to information that can be used to identify a living individual. We may obtain PII from you through two types of interaction (manually submitted by you and automatically collected by us):

#### **A. INFORMATION YOU SUBMIT TO US MANUALLY**

We collect the PII 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

#### **B. INFORMATION AUTOMATICALLY COLLECTED AND STORED THROUGH INTERACTION**

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

- Phone number, SIM number, subscriber number, and Device ID - IMEI, MEID
- Date and time, country, geographic location based on GPS/Wi-Fi/communications network local information.

When we obtain PII from you, we treat such information in accordance with this Privacy Policy and applicable laws. You may decide not to proceed with any activity that requests PII. By installing or using our AVG Products, you hereby agree with our collection and use of your PII as outlined in this Privacy Policy.

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

The PII we collect is generally used to help us develop the best protection and performance for you, process your requests and transactions, to tell you about opportunities we think will be of interest to you, to customize your experience with our AVG Products and 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 PII 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 opportunities that may be of interest to you, including offers relating to third party products and services
- Provide you with service messages to your device
- 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
- Alert you in case your files, applications or emails are malicious, potentially malicious or spam.

If AVG is involved in a merger, acquisition or asset sale (“Acquisition”), AVG will abide by this Privacy Policy. Affected users will be informed if we transfer any PII or if PII becomes subject to a different privacy policy as a result of such Acquisition.

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### **Do We Use Cookies or Other Anonymous Identifiers?**

Yes, in certain circumstances. You can find comprehensive information on how AVG's Site uses cookies and third party tracking services [here](#).

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

### **AVG TECHNOLOGIES WORLDWIDE**

Since AVG Technologies is a global company, we provide information on users of AVG Products to our worldwide offices which are listed at [www.avg.com/contacts](http://www.avg.com/contacts). By providing us with PII, you consent to our ability to send your PII between our Affiliates around the world to provide you with products and services. This may include cross-border transfers of user data. The PII and NPII 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 PII 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. Where relevant, these companies are required to comply with our data privacy and information security standards when handling Personal data.

We may share your PII if we believe in good faith that such disclosure is: a) authorized by law or necessary to comply with a valid 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 or its customers or employees; e) in connection with a sale of all or part of our business or f) otherwise consented to by you. Such disclosure may include cross-border transfer of PII.

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 RESELLERS, DISTRIBUTORS AND OTHER DISTRIBUTION CHANNEL PARTNERS**

In certain circumstances, we may share certain of your PII, such as your e-mail contact, with selected AVG Technologies resellers, distributors and other distribution channel partners. This might include cross-border transfer of PII. Some of them may contact you, on our behalf, 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 in order to fulfill your search requests. Please note they may have their own privacy policy which we encourage you to read and understand.

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## **Rights and Responsibilities**

If you have given your PII to AVG Technologies, 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 PII, 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. In addition you can opt out of marketing contact upon request, as explained below. If have any questions about this policy or any of the above, please email us at [privacy@avg.com](mailto:privacy@avg.com) or see instructions in the AVG Product.

Please note: we may reject requests which risk the privacy of others or 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.

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## **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 AVG Technologies company.

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 following the relevant unsubscribe process outlined in the applicable 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.

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## **Links to Other Companies**

Periodically, our Site or our AVG 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 destinations 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 PII to those sites.

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## **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. Please note that these co-branded websites may have their own privacy policy which we encourage you to read and understand.

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## **Security**

AVG Technologies is committed to maintaining the security of information under our control. 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.

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## **Changes of Privacy Policy**

We reserve the right to change this Privacy Policy at any time. However, we will highlight that changes have been made by indicating at the top of the Privacy Policy the date it was last updated. On the date noted at the top of the privacy policy, we made an update to this Privacy Policy. The main adjustments made are:

- Explanation of how we handle non-personally identifiable information

- Explanation of third party data transfer and sharing conditions
- Explanation of how we treat personally identifiable information in situations involving mergers and acquisitions
- Explanation of Other Anonymous Identifiers and their use, including third party tracking and analytics
- Provision of details around processing customer personally identifiable information requests

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