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# WSAT 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 Webroot Security Awareness Training Privacy Statement (the “**WSAT Statement**”) applies to our Webroot Security Awareness Training service that you purchase, access, or use (“**WSAT Service**”).

Other documents, including our Subscription Agreement, [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, accessing, or using the WSAT Service you are accepting and consenting to the practices described in this WSAT Statement.

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## INFORMATION WE MAY COLLECT

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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 for the WSAT Service or accessing the WSAT Service through your account or when you contact us (such as by phone, email or chat). The information you give us may include:

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

**Information we collect automatically.** When you use the WSAT Service, there is certain information which we will collect automatically, such as:

- keycode, license, and account information (including the duration of your subscription to the WSAT Service and the version of the WSAT Service that you are using);
- information provided via a Webroot license management application, if applicable;

- device information (including information on your operating system, MAC address, device or machine ID, logged-in user, and other characteristics);
- **Information we collect from other sources.** We may use a third party to ensure that email addresses used for the WSAT Service have not been hacked or breached.

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## **HOW WE MAY USE YOUR INFORMATION**

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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 certain products and services;
- to process and renew your orders;
- to provide customer support;
- to communicate with you regarding the WSAT Service;
- 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 WSAT 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 the WSAT Service;
- 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; and
- for other purposes consistent with this WSAT Statement.

**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 WSAT Statement, such as to ensure used email addresses have not been known to have been breached.

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#### **DISCLOSURE OF YOUR INFORMATION**

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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 WSAT 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 WSAT Service;
- process or fulfill subscriptions to the WSAT Service 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 WSAT Service, including, for example, Google Analytics (please see <https://support.google.com/analytics/answer/6004245> for more information and <https://tools.google.com/dlpage/gaoptout> to opt out) and Flurry Analytics (please see <https://dev.flurry.com/secure/optOut.do> for more information and to opt out);
- to enable third parties from whom we may sublicense features or components for the WSAT Service to provide such products or services to you; and
- for other purposes consistent with this WSAT 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.

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 the WSAT Service, 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.

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#### **WHERE WE PROCESS YOUR PERSONAL INFORMATION**

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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.

We will take those steps reasonably necessary to ensure that your information is treated securely and in accordance with this WSAT 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.

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#### **YOUR ACKNOWLEDGMENTS**

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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.

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#### **SECURITY**

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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.

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## **YOUR RIGHTS**

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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 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 relationship with us or to prior transactions between you and us.

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## **RETENTION OF PERSONAL INFORMATION**

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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.

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## **PROVISIONS APPLICABLE TO CALIFORNIA RESIDENTS ONLY**

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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](mailto: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](mailto: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](mailto: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.

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**PROVISIONS APPLICABLE TO CITIZENS OF EUROPEAN ECONOMIC AREA ONLY**

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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, such as marketing to you, you have the right to withdraw such consent at any time (we suggest by using the contact details below).

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

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**ACCESSING, UPDATING, OR CORRECTING INFORMATION**

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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.

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**CHANGES TO OUR WSAT STATEMENT**

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We reserve the right to revise or modify this WSAT 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 WSAT 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 WSAT Statement.

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## **CONTACT US**

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Questions, comments and requests regarding this WSAT 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](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 purchase of WSAT Service in North America is Webroot Inc. of 385 Interlocken Crescent, Suite 800, Broomfield, CO 80021, USA. For purchases of WSAT Service 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.