

Privacy Policy – Bitdefender

Version 2.1, adopted on 9.11.2016

The document is meant to inform you on what kind of personal data we collect, how and where we may use these data, how we protect it, who has access to it, with whom do we share it and how you may correct the data collected by us.

This privacy policy applies to all websites managed by Bitdefender, but also to all its products and services. The anti-theft and parental control services have additional privacy policies which are detailed in Chapter 7 of this document.

1. General information

S.C. BITDEFENDER S.R.L. (hereafter mentioned as Bitdefender), with its official headquarters in Bucharest, district 2, Delea Veche street, no. 24, building A, registered in the Bucharest Trade Register with number J40/20427/2005, fiscal code RO18189442, e-mail privacy@bitdefender.com processes personal data in agreement with the Romanian data protection legislation (Law 677/2001) and the EU directive on personal data (Directive 95/46/EC) and is registered at the Romanian Data Protection Authority under number 12017.

Bitdefender offers IT security products and services. Our main goal is to provide quality products and services in these areas by respecting privacy and personal data of customers, Internet users and business partners.

For this purpose, we are collecting only the personal data that are absolutely necessary for the specified purposes, on a best effort basis. For the collected information and data, we are striving to apply adequate solutions in order to anonymize them, or at least to pseudonymize them.

Our main principle applied to the data we collect is anonymization of all technical data that can be used by Bitdefender only for the specified purposes below. In cases where perfect anonymization of technical data is not possible, the potential identification of a user could be possible only in about 0.0001% of the cases.

Nevertheless, the following data is considered personal data according to the European legislation definition (Directive 95/46/EC):

any information relating to an identified or identifiable natural person ('data subject'); an

identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

In this context, Bitdefender processes personal data for the following main purposes:

- To contact its clients and/or users of its products, services and websites for support or counseling;
- To assure correct and efficient operation of its products and services, according to the technical specifications, and for their improvement, including analyzing the reported IT security issues, delivering and customizing the related services to the users needs and developing new technologies;
- To make statistical analysis and market studies;
- To have marketing activities for Bitdefender's own needs.

2. Personal data collected

All personal data collected by Bitdefender will be recorded, stored, used and managed on protected servers, as well as on other devices that allow these operations with appropriate security measures. Also, all Bitdefender's websites are being hosted on protected servers.

Bitdefender may collect personal information from its users in four different ways:

1. directly provided by a user or a Bitdefender Partner;
 - indirectly provided by its websites or its products, such as:
2. technical data sent by the Bitdefender products installed by users;
3. traffic data registered by the servers that host our websites;
4. cookies, that may share some personal information.

2.1. Personal data directly provided by a user/partner – for example, when you login on your Bitdefender account (known as Bitdefender Central - <https://login.bitdefender.net>), we might ask your name, surname and/or email address. When you access the Support Center, we may ask for a valid email address or a phone number. All these data are being used for

contacting you, for contractual purposes, providing a specific user with a license to use our products, for solving a request or complaint you addressed to us or for offering technical support. Bitdefender may also ask for other data that could be considered personal data, if those are necessary for these specified purposes.

2.2. Technical data sent by Bitdefender products – when you use Bitdefender products it is possible to share with us some technical details, such as data for identifying the device (UUID), the infected URL you reported or IP addresses. If you use a Bitdefender product that integrates with your email server, some technical data of the infected files could be sent to us, including data such as sender, recipient, subject or attachment. In most of cases, these technical data may not lead to your direct or indirect identification, but in some very specific cases computer specialists might be able to identify a specific user. Therefore we treat all these information as personal data and we protect them as such.

These information are solely used for the purpose of correct and efficient operation of the products and services, according to the technical specifications, and their improvement, including by analyzing the reported security issues. This would also include delivering and customizing related services. Also, we may use these information for statistical purposes and improving the quality of our products.

2.3. Traffic data – when a user visits a website, it automatically reveals certain information, such as the IP address, date and time of the visit or the referral website that sent you to Bitdefender websites. Bitdefender, like any other website manager, may record this kind of information for a limited period of time. We also use other external services of traffic analysis, such as Google Analytics, Omniture or Hotjar.

All these data are used exclusively for internal marketing, improvement or statistical purposes, but also for improving our web services. The data is kept only as long as they are necessary for these purposes.

2.4. Cookies - In order to offer a customized experience to our users, Bitdefender may use cookies to facilitate storing and tracking your preferences. Cookies may also be used for website optimization or marketing.

For example, we may use first party cookies for identification or communication purposes, such remembering your username, preferences and language.

As regards external Bitdefender services which may place third party cookies when navigating the Bitdefender websites, their purposes are for marketing, traffic analysis and social media sharing, as indicated in the table below:

Service name	Purpose
Adobe Audience Manager	Marketing
Adobe Target	Marketing
Facebook Connect	Social media
Facebook Social Plugins	Social media
Google Adwords Conversion	Marketing
Google Analytics	Traffic analysis
Google Dynamic Remarketing	Marketing
Google Tag Manager	Tag Management System
Google+ Platform	Social media
Gravatar (only for the forum)	Social media
MediaMath	Marketing
Omniure	Traffic analysis
Twitter Button	Social media
Twitter Advertising	Marketing
Hotjar	Traffic analysis

Most browsers are configured to automatically accept cookies. However, you can decide to reinstall the browser or to set it up in order to notify you each time a cookie is placed or even to refuse cookies. If your browser is configured not to allow all cookies some sections of our website may not be correctly displayed.

If you would like to refuse cookies, go to your browser settings in order to delete or block cookies or install plug-ins which have this function:

- Internet Explorer - <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies>
- Mozilla Firefox - <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Google Chrome - <https://support.google.com/chrome/answer/95647?hl=en>
- Safari - https://support.apple.com/kb/PH19214?locale=en_US

3. Personal data protection

As a leader in information security services, confidentiality and data protection are of vital importance for us. Access to the collected personal data is restricted only to Bitdefender employees and data processors which need access to this information. All Bitdefender information security policies are ISO 27001 certified.

Bitdefender may use other IT companies to process the collected personal data. These companies are considered data processors and have strict contractual obligations to keep the confidentiality of the processed data and to offer at least the same level of security as Bitdefender. Data processors have the obligation not to allow third parties to process personal data on behalf of Bitdefender and to access, use and/or keep the data secure and confidential.

At the same time, Bitdefender may store personal data in Romania, as well as in any other jurisdiction which offers adequate level of personal data protection according to European Union standards. For processing data in any other countries, we will ask for the client's consent or we will rely on Standard Contractual Clauses, notified to the Romanian Data Protection Authority according to Romanian legislation (for example Authorization no 26/2016 on data transfer to Amazon Web Services Inc from US). Amazon Web Services is also participating to the US-EU Privacy Shield Framework.

Access to certain sections of Bitdefender websites is protected by a username and password. We recommend not to reveal this password. Bitdefender will never ask for your account's password via any kind of messages or phone calls. We advise not to disclose your password to anyone asking you to do so. If possible, we also recommend to log out of your online

services account after each session. We also advice to close the browser window after navigating or using Bitdefender services.

Unfortunately, transferring data over the Internet cannot be 100% secure. Consequently, despite our efforts to protect personal data, Bitdefender cannot assure or guarantee the security of the information transmitted by the user until the information is on our servers. Any information you transmit is done on your own risk.

Any unauthorized access to protected sections of Bitdefender websites, including any unsuccessful attempt to access protected sections could be a crime. These kind of activities could be reported to competent authorities.

4. Who has access to personal data

In principle, Bitdefender will not reveal any personal data about its users to third parties without explicit consent from the users.

Exceptionally, Bitdefender may reveal personal data to:

4.1. Competent authorities, upon their request according to the applicable laws or when this is necessary to protect the rights and interests of our clients and Bitdefender. Bitdefender may use personal data to prevent and identify fraud, as well as in any other legitimate purpose, complying with applicable laws.

4.2. Bitdefender may allow limited access to its Partners, which are presented on [Bitdefender's Partners webpage](#). Access will be allowed only to certain data related to its referred clients and just for the purpose of fulfilling the contractual obligations between Bitdefender and its Partner for selling or for support of Bitdefender products. All Partners have strict contractual obligations to keep the confidentiality of data and to offer at least the same level of security as Bitdefender. These Partners have the obligation not to allow third parties to access personal data processed on behalf of Bitdefender.

4.3. Bitdefender subsidiaries in your country may send some personal information to its main company - S.C. BITDEFENDER S.R.L, in Romania.

Also, when you access Bitdefender services or products and you are asked to give information about yourself, you will reveal this information only to Bitdefender. The only exception is when the information is offered in partnership with another website or service

(such as Facebook login, Google+ login or Microsoft Live login).

Each time when such a service is offered in partnership with another website you will be notified. If you wish this data not to be accessed or used you can choose not to allow data transfer via this particular service.

If you choose to accept data sharing, it is important to mention that the service partners may have separate data collection and privacy policies. Bitdefender has no control and cannot offer guarantees regarding all the legal aspects that these independent confidentiality practices entail.

5. How to correct personal data related errors

When you create an account on Bitdefender websites or for one of our services, a confirmation email with your account details will be sent. The confirmation email will be sent to the email you supplied and it may describe the ways in which you can modify or delete the account you created. We advise you to keep this confirmation email since it contains useful information regarding access to our services. Any requested modification will be solved in maximum 15 days from when the written request of the user has been received.

6. Your personal data rights

According to European Union data protection directive and its Romanian implementation (Law 677/2001), data subjects shall have the right to access to data, right to rectification, right not to be subject to individual decisions and the right to address a court. Data subjects also have the right to oppose to personal data processing and to request the deletion of the collected personal data.

For exercising these rights, you may send a written request, dated and signed and send it to the above mentioned Bitdefender headquarters or via email to privacy@bitdefender.com

7. Additional information regarding personal data collection of certain Bitdfender services and products

7.1. Anti-theft services of Bitdefender products

This chapter complements the privacy policy with specific information regarding processing information which may be personal data and which is collected by Bitdefender for the anti-theft services.

Part of the Bitdefender products include the anti-theft service option designed for both mobile phones products as well as for tablets and laptops. Once activated and configured, the anti-theft option can track in real time via geo-localization the lost or stolen device. This Bitdefender service offers the localization option as well as other connected options such as remote blocking of the device, deleting the entire content of the device or taking photos of the person who is accessing the phone without authorization. [More details are available here.](#)

In case the anti-theft services are activated, Bitdefender may receive personal data such as geo-localization data either from GPS, GSM cells, Wi-Fi usage or IP address. The only purpose of processing these data is the functioning of the anti-theft service offered by Bitdefender. For the purpose of identifying the precise location, we may use third party services.

All geo-localization information are kept for as long as the anti-theft service is active, but they will be deleted when the service is deactivated.

Anti-theft services may be remotely activated from your Bitdefender system account (known as Bitdefender Central). For this reason it is highly important for your privacy and personal data protection not to reveal your password to unauthorized persons. For more advice in this regard please see Chapter 3 of this document.

Thus, the owner of a Bitdefender account may have administration rights for Bitdefender services and products. Therefore on the devices where the anti-theft services are installed, he/she can operate commands remotely. In this regard, the entire responsibility of the account owner is to ensure that he/she can fulfill these actions from a legal standpoint and that he/she has the right to know the location, to take pictures remotely, to block or delete the device' content or to interact in any way with it. Therefore, we recommend to activate the anti-theft service exclusively on your own devices or on devices where you have the right to legally do so.

7.2. Parental control services

This chapter completes the rest of the privacy policy with specific details regarding processing information which may be personal data and which are collected by Bitdefender for the parental control services.

Some of Bitdefender products [include the parental control option](#). If you activate this option you have the possibility to monitor your children's activity and to restrict access to certain phone numbers, applications, websites or Internet services. This is only possible on children devices (for example computer or phone) for which you installed and activated Bitdefender.

The parental control services option settings are managed from the web interface through which you access your Bitdefender account (known as Bitdefender Central). More details regarding the functionalities of this product [are available on our dedicated webpage](#).

Once you activated the parental control services, Bitdefender will ask certain data for creating a profile – name, age and sex of the person. The name will be used exclusively for device identification purposes and you do not have to give your child's full name. Age and sex are necessary only for determining the default level of online protection offered by this product which can be also later changed or configured by the account administrator.

Where this Bitdefender parental control product is installed and an active profile is associated with the device, Bitdefender may collect, exclusively for the purpose of displaying in the parent's account, detailed information about the use of the device such as: visited websites, search engine keywords, used applications and software, traffic data monitoring of phone calls and messages, social media monitoring and geo-localization information. The collected information depends on the settings configured by the parent in Bitdefender Central.

The only purpose of collecting this data is reporting them to you, as a parent. We do not use children information for identification or monitoring Internet access by us.

Under no circumstance we will transmit to third parties the above mentioned information for marketing purposes or any other information which could lead to identifying your children.

When processing this data from your children's device, Bitdefender acts as a data processor.

Therefore, the responsibility of a notice to your children regarding the installation of this software and the way the personal data is processed is exclusively up to you. You are the only one who may activate this option and specify which type of personal information you wish to be collected.

The Bitdefender account owner has administration rights for Bitdefender products and services which includes parental control services. As such, he/she has full responsibility in assuring that he/she can undertake the surveillance activity from a legal point of view and that he/she has the right to know the location, to block the content or applications from that device. Therefore, we recommend to activate the parental control service exclusively on your minor children's devices or where you have the legal right to do so, based on the applicable law. We inform you that any illegal monitoring of online behavior or communications may be a crime. In this sense we are not recommending activating parental control services on devices used by persons that are over 16 years old.

8. Publication date

The privacy policy has been adopted today 9 November 2016 and will be modified each time is necessary without prior or future notice of the changes. The new version will enter into force when published on the website and it will be marked accordingly. The present document is available at <http://www.bitdefender.com/site/view/legal-privacy.html>