Products Policy

This Policy was last updated in May 2023.

Antivirus

Antivirus for Desktop (Mac and Windows)

Official Product Name

<u>Avast Free Antivirus</u>, <u>Avast Internet Security</u>, <u>Avast Premium Security</u>, <u>Avast Premium Security</u>, <u>Avast Premium Security for Mac</u>, <u>Avast Premium Security for Mac</u>

Avast Business Antivirus, Avast Business Antivirus Pro, Avast Business Antivirus Pro Plus, Avast Business Patch Management, Avast Business Management Console, Avast Business Antivirus for Mac, Avast Business Antivirus for Linux, Essential Business Security, Premium Business Security, Ultimate Business Security,

(collectively as "Antivirus for Desktop")

Core Functionality

The Antivirus for Desktop provides protection against malicious, harmful or unwanted software and technologies by performing key tasks, such as pinpointing specific files for the detection of malwares, scheduling automatic scans, and securing your device against malware. It may also detect threats to your online privacy and inform about possible protections against these risks.

What are Product's Main Features

- **Smart Scan** is a comprehensive scan that detects browser threats, outdated applications, hidden viruses, system and privacy threats and other issues at the same time.
- CommunityIQ is a threat monitoring service for Windows and Mac which sends information about a threat detected in your device (samples of suspicious files and detection metadata) to our server, so we can observe

- how the threat spreads and block it. This is vital for the functioning of our Antivirus and our ability to keep your device secure.
- CyberCapture detects and analyses rare, suspicious files on your Windows. If you attempt to run such a file, CyberCapture locks the file from your PC and sends it to our Threat Lab where it is analysed in a safe, virtual environment. All files are uploaded over an encrypted connection, which means your data is inaccessible to hackers.
- **File Reputation** provides a real-time comparison with an up-to-date list of malware databases of executable files sourced from users of Windows who participate in the service. FileRep processes files or their hashed versions to evaluate which are infectious and updating virus databases.
- Online Security is a browser plug-in which needs to be specifically activated which checks if the site isn't malicious or phishing.
- Browser Cleanup is a module inside Antivirus for Desktop (Windows)
 which inspects the browser extensions of most browsers, tries to identify
 malicious extensions and offers to remove them. Browser Cleanup is on
 by default.
- Web Shield scans data that is transferred when you browse the internet in real-time to prevent malware from being downloaded and run on your computer. By default, Web Shield is on and configured to provide optimal protection when switched on.
- File Shield scans programs and files saved on devices for malicious threats in real time before allowing them to be opened, run, modified, or saved.
- Email Guardian is a cloud-based service which monitors emails from supported providers, scans them the minute they hit your inbox and flags them as malicious if they contain a threat. This feature processes for its functionality, products and business improvement personal data, such as e-mail and its content, including attachments. When enabled, it provides optimal protection even when your device is switched off. To connect to Gmail accounts we need to ask Google for permission to use its APIs. Google allows companies to use its APIs only if they undertake to limit its use of information accessed through the APIs. As a result, Product's use and transfer to any other product of information received from these Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements. In line with the privacy-by-design principle, we use privacy-preserving techniques (in particular Presidio) to remove personal data from emails to ensure the highest level of protection (this applies to Email Shield, too). These techniques, however, cannot guarantee full effectiveness and, therefore, we still treat all data as personal.

- Email Shield scans for threats in your incoming and outgoing email messages and attachments. Scanning applies only to messages sent or received using mail management software, such as Microsoft Outlook, Apple Mail or Mozilla Thunderbird.
- Hack Alerts when enabled, it searches and monitors email addresses associated with your Account for data breaches to alert you when your data has been compromised in a breach and your information is exposed on the dark web. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here.

Personal Data We Process

While using Antivirus for Desktop, we collect and process the following Service and Device Data (in addition to Account Data and Billing Data, if relevant):

Service Data	What we use it for and for how long
Identifier of the content (message) being delivered	Service Provision (36 months)
	To monitor service functionality
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (50 months) • To monitor messaging performance
IP address	Service Provision (36 months)
	 To detect the approximate location of malicious software. For free Antivirus, IP address is replaced at activation with city/country. For free and paid Antivirus, it is a part of malware infection file replaced in 30 days with city/country

Samples, files	Service Provision (36 months)	
	 For protection, detection, analysis, blocking, quarantining and deleting of malicious software 	
Detections	Service Provision (36 months)	
	 For protection, detection, blocking, quarantining and deleting of malicious software 	
URLs and referrers	Service Provision (36 months)	
	 For protection, detection, blocking, quarantining and deleting of malicious software 	
Information about cookies	s Service Provision (stored locally on device only	
and other tracking technologies	To detect tracking and privacy issues and inform users about solutions	
Events and product usage	Service Provision (36 months)	
	 To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product 	
	In-product Messaging (24 months)	
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	
	Product and Business Improvement	
	 To better understand our users' behavior (50 months) 	

	To introduce a new feature or product based on previous experience (36 months)
Email Guardian - Email	Service Provision (seconds)
	 In order to check your email, we download it whole, together with metadata and attachments. We keep it in our systems only during the processing, we don't store it
	Service Provision (36 months)
email address of sender	For the functionality of malware scanning
	To evaluate senders' reputation
Email Guardian - Subject of emails, MessageIDs of emails	Service Provision (4 weeks) • To ensure proper functionality and fix bugs. Stored together with the user's email address
Email Guardian - Detections	Service Provision (36 months)
 hash of the email 	For the functionality of malware scanning
 hash of the userID 	and maintenance
email subject	Product and Business Improvement (36 months)
 hash of sender email address 	· · · · · · · · · · · · · · · · · · ·
 domain address of sender 	
 detection type and name 	
 name of the attachments and their hashes 	
country of the user	

Email Shield - Detections

- email subject
- sender email address
- email content or attachment
- detection type and name

Service Provision (1 month)

 For protection, detection, blocking, quarantining and deleting of malicious software

Device Data	What we use it for and for how long
Internal online identifiers (GUID, Device ID)	Service Provision (36 months)
	For ensuring continuous functionality and breaking down entries in database
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand our users' behavior (50 months)
	 To introduce a new feature or product based on previous experience (36 months)
	Service Provision (36 months)
computer or device	To check for compatibility issues in automated crash dumps
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product

	and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (50 months)
	 To introduce a new feature or product based on previous experience (36 months)
Location	Service Provision (36 months)
	 To set up a proper product language version for Windows
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior based on approximate location (50 months)
	 To introduce a new feature or product based on approximate location (36 months)
Applications - other security	Service Provision (36 months)
SW / antiviruses present	 To determine how Antivirus should behave (e.g. if it should be activated in Windows Security Centre or not, whether it should run in passive or active mode)
Applications on the device	Service Provision (36 months)

 For formulating rules of how Antivirus should behave in relation to other SW installed (e.g. exceptions in scanning, filtering, notifications, applying Do not Disturb rules)

In-product Messaging (6 months)

 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement (up to 36 months)

- To improve the users' overall experience by developing new features and products
- To understand/estimate market opportunity

Our other products/licenses | Service Provision (36 months) on the device and their status

 To recognize what features should be enabled or disabled, what product should be installed or uninstalled

In-product Messaging (6 months)

• To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement (up to 36 months)

- To improve the users' overall experience by developing new features and products
- To understand/estimate market opportunity

Internet and connection /	Service Provision (36 months)
Network data / Number of devices on Network	 For security prerequisites (e.g. DNS settings check, port restrictions enabling or disabling Security status check of devices on the network)
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (36 months)
	 To introduce a new feature or product based on previous experience
Browsers (installed, default)	Service Provision (36 months)
	For opening content in given browser
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (50 months)
	 To introduce a new feature or product based on previous experience (36 months)

Note that samples (files, URLs) used for malware analysis are kept in our systems as long as it is necessary to ensure proper functionality of the AV

product. These samples are not connected with any identifiers or individuals and the retention periods indicated above do not apply to this use.

The third-party analytics tools we use for Antivirus for Desktop is <u>Google Analytics</u>. For further information regarding our third-party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.

Antivirus for Mobile (Android)

Official Product Name

<u>Avast Mobile Security</u>, <u>Avast Mobile Security Premium</u> (collectively as "Antivirus for Mobile (Android)")

Core Functionality

Antivirus for Mobile (Android) provides people with essential mobile security with added privacy features. Block malware, check the safety of installed apps, scan public Wi-Fi networks for possible security weaknesses — all with a single app.

What are Product's Main Features

- Device Scan scans your device or a specific file for malware apps and files and various types of security vulnerabilities.
- Wi-Fi Security and Speed Check enables you to scan your network for vulnerabilities, and tests the speed of the network.
- **Web Shield** detects and notifies you when accessing a malicious website that could represent a potential security risk for you.
- **App Locking** is a paid feature, which protects your sensitive apps with a PIN, pattern, or fingerprint.
- App Insights consists of three features: App Usage, Data Usage and App Permissions. App Insights requires your device user permission in order to work and we ask you for this permission (if not granted yet). When you grant the permission, we keep the data from your list of installed apps stored locally in your phone's database. App Usage provides information about how much time you spend using each app. App Permissions allows you to view which permissions are required by each of your installed apps. Data Usage monitors your data consumption and helps you avoid additional charges by notifying you when you approach the limit. This feature requires access to IMEI and IMSI.

- Clean Junk analyzes the space on your device and displays the amount of storage space that is being used by junk files.
- Photo Vault allows you to protect access to your photos with a PIN code.
- Hack Alerts when enabled, it searches and monitors email addresses associated with your Account for data breaches to alert you when your data has been compromised in a breach and your information is exposed on the dark web. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here.
- Privacy Audit provides the user with an evaluation of installed apps based on data collected and permissions asked by the app compared to similar apps. The feature also compares its findings with the app's privacy policy declarations.
- **VPN** feature protects your privacy by encrypting your online communication so no one can spy on what you're doing online. It allows you to pick a specific location to be connected from.
- **Scam Protection** warns you if you tap a dangerous link from any email, SMS, or messaging app.

Personal Data We Process

While using Antivirus for Mobile (Android), we collect and process the following Service and Device Data (in addition to Account Data and Billing Data, if relevant):

Service Data	What we use it for and for how long
Identifier of the content (message) being delivered	Service Provision (36 months)
	To monitor service functionality
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (50 months)

	To monitor messaging performance
IP address	Service Provision (36 months)
	 To detect the approximate location of malicious software. For free Antivirus, IP address is replaced at activation with city/country. For free and paid Antivirus, it is a part of malware infection file replaced in 30 days with city/country
Samples, files	Service Provision (36 months)
	 For the functionality of malware scanning and analysis
Detections	Service Provision (36 months)
	For the functionality of malware scanning
Information concerning URLs of websites visited (malicious and non-malicious) and referrers (previous page with link to malware-hosting site)	Service Provision (36 months) • For Web Shield feature's detection of malicious websites
Events and product usage	Service Provision (36 months)
	 To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product In-product Messaging (24 months)

	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	 Contextual promotional messaging (upsell, cross-promotion)
	Product and Business Improvement
	 To better understand our users' behavior and users' acquisition (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
User's email address	Service Provision (36 months)
associated with your Account	 To search for your credentials in data breaches.
	 To send a requested report to you on whether or not their credentials have leaked.
	Product and Business Improvement (36 months)
	To improve the user's overall experience

Device Data	What we use it for and for how long
Online identifiers (GUID,	Service Provision (36 months)
Device ID (Android ID), Advertising ID)	 To ensure functionalities of the product and its features
	In-product Messaging (24 months)
	To inform users of problems that will not be solved by the currently installed product

and to offer users a solution to the detected problem
Product and Business Improvement
 To better understand our users' behavior (50 months)
 To recognize reinstalls of the app on the same device (36 months)
Third-party Ads (not stored after provision)
We process Advertising ID only for IronSource which allows it to place advertisements
Service Provision (36 months)
 To ensure functionalities of the product and its features
In-product Messaging (6 months)
 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
Product and Business Improvement
 To better understand users' behavior (50 months)
 To improve the user's overall experience by developing new features and products (36 months)
Service Provision (36 months)
 Delivering geo-specific changes to app's configuration (can be controlled by both local/on-device or remote features)

	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior based on approximate location (50 months)
	 To introduce a new feature or product based on approximate location (36 months)
IMSI	Service Provision (accessed only locally)
	 For App Insights's feature Data Usage to provide data consumption of installed apps based on IMSI
` -	Service Provision (30 days)
number)	 For white-labeled versions of the app sold through partner carriers serves as unique ID connected with license
	 For customer service purpose to verify that the user contacting customer support has valid and working license for the product
Applications, for privacy	Service Provision (36 months)
features their characteristics such as permissions, signing certs, package and library info, app versions	 To define rules for malware protection
	 To enable the calculation of the privacy features and tell whether the app rating and classification you received are relevant and up-to-date

	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (36 months)
	To improve the product or its feature based on the user's feedback and use
Internet and connection	Service Provision (36 months)
	For security prerequisites
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	To better understand users' behavior (50 months)
	 To introduce a new feature or product based on previous experience (36 months)

Note that samples (files, URLs) used for malware analysis are kept in our systems as long as it is necessary to ensure proper functionality of the AV product. These samples are not connected with any identifiers or individuals and the retention periods indicated above do not apply to this use.

These are the third-party analytics tools we use for Antivirus for Mobile (Android):

Google Analytics

- Google Firebase and Crashlytics Analytics for Android
- AppsFlyer

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

The free version of Antivirus for Mobile (Android) serves relevant third-party advertisements. These are the advertising partners we use for this product:

- Google AdMob
- Amazon
- Facebook Audience Network
- InMobil
- AppLovin
- Unity Technologies
- IronSource
- Liftoff Mobile

For further information regarding our third-party ads partners, including their privacy policies, please refer to our <u>Consent Policy</u>.

Antivirus for Mobile (iOS)

Official Product Name

Avast Security & Privacy

Core Functionality

Avast Security & Privacy (hereinafter as "Antivirus for Mobile (iOS)") provides protection for your browsing, passwords, photos and Wi-Fi. The product consists of several free and paid features, such as Hack Alerts and Secure Browsing, which are described in detail below.

What are Product's Features

- **Web Shield** detects and notifies you when accessing a malicious website that could represent a potential security risk for you.
- Hack Alerts looks for leaked personal information, whether your data has been compromised in a breach and your information is exposed on the dark web. If we identify new breaches we alert you based on the email

- address you submitted. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here.
- **Photo Vault** locks your photos in an encrypted vault and secures them with a PIN, Touch ID, or Face ID so that only you have access to them.
- Wi-Fi Security automatically scans Wi-Fi networks for vulnerabilities to verify that the network you're connected to is safe. Receive alerts if any risk is detected.
- **Secure Browsing** (available only for paid version) protects your privacy by making sure no one can spy on what you're doing online with Secure Browsing VPN feature.
- Email Guardian is a cloud-based service which monitors emails from supported providers, scans when they arrive in your inbox and flags them as malicious if they contain a threat. In order to deliver its functionality and allow us to improve our products and business, this feature processes personal data, such as e-mail and its content, including attachments. When enabled, it provides protection to your device even when the device is switched off. Connecting this feature to Gmail accounts requires us to ask Google for permission to use its APIs. Google allows companies to use its APIs only if they undertake to limit its use of information accessed through the APIs. As a result, the use and transfer of information received from these Google APIs to any other product will adhere to Google API Services User Data Policy, including the Limited Use requirements. In line with the privacy-by-design principle, we use privacy-preserving techniques (in particular Presidio) to remove personal data from emails to ensure the highest level of protection. These techniques, however, cannot guarantee full effectiveness and, therefore, we still treat all data as personal.

Personal Data We Process

While using Antivirus for Mobile (iOS), we collect and process the following Service and Device Data (in addition to Account Data and Billing Data, if relevant):

Service Data	What we use it for and for how long

Information concerning URLs	Service Provision (36 months)
of websites visited (malicious and non-malicious) and referrers (previous page with link to malware-hosting site)	For Web Shield feature's detection of malicious websites
Timestamps of your	Service Provision (36 months)
connections for Secure Browsing	 To manage the number of concurrent active connections, and handle abuse
	Product and Business Improvement (36 months)
	To improve the user's overall experience
The subnet of your originating	Service Provision (36 months)
IP address for Secure Browsing	 To plan for increased network demand and capacity
IP address of the VPN server	Service Provision (36 months)
you're using for Secure Browsing	 To troubleshoot our service and plan for new network capacity
Amount of data transmitted	Service Provision (36 months)
for Secure Browsing E.G. 5GB up or down	 To plan for new network capacity and server improvements
	Product and Business Improvement (36 months)
	To improve the user's overall experience
User's email for Hack Alerts	Service Provision (36 months)
	 To send a requested report to you on whether or not their credentials have leaked
	Product and Business Improvement (36 months)

	To improve the user's overall experience
Events and product usage (app metadata, number of hack alerts checks, number	 Service Provision (36 months) To ensure continuous functionality (installations, versions, updates, settings)
and result of Wi-Fi scans, error logs and screen flow)	Product and Business Improvement
	 To understand the user's behavior (14 months)
	 To improve the user's overall experience (36 months)
Email Guardian - Email	Service Provision (seconds)
	 In order to check your email, we download the whole email message, including metadata and attachments. We keep it in our systems only during the processing, we don't store it
	Service Provision (36 months)
address of sender	To provide the functionality of malware scanning
	To evaluate senders' reputation
Email Guardian - Subject of emails, MessageIDs of emails	Service Provision (4 weeks) To ensure proper functionality and fix bugs. Stored together with the user's email address

Email	Guardian - Detection
•	hash of the email
•	hash of the userID

- email subjecthash of sender email address
- domain address of sender
- detection type and name
- name of the attachments and their hashes
- country of the user

Service Provision (36 months)

• To provide the functionality of malware scanning and to do maintenance

Product and Business Improvement (36 months)

• To do threat statistics and internal analysis

Device Data	What we use it for and for how long
OS Version	Service Provision (36 months)
E.g. iOS 13.1	For user support and troubleshooting
3	Product and Business Improvement
	 To understand the user's behavior and product development planning (14 months)
	 To improve the user's overall experience (36 months)
Mobile Security for iOS	Service Provision (36 months)
version	For user support and troubleshooting
E.G. Mobile Security for iOS version 1.2.2	Product and Business Improvement
	 To understand the user's behavior and product development planning (14 months)
	 To improve the user's overall experience (36 months)

MSISDN (Mobile number)	phone	Service Provision (30 days)	
			 For white-labeled versions of the app sold through partner carriers serves as unique ID connected with license
		 For customer service purpose to verify that the user contacting customer support has valid and working license for the product 	

These are the third-party analytics tools we use for Antivirus for Mobile (iOS):

- Google Firebase Analytics and Crashlytics for iOS
- AppsFlyer

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

AntiTrack

Official Product Name

<u>Avast AntiTrack Premium, Avast AntiTrack for Mac, Avast AntiTrack for Android</u> (collectively as "AntiTrack")

Core Functionality

As you browse the web, cookies and digital fingerprint-based tracking technologies collect and link information about your activities in order to create profiles of your behavior. This data is then shared, bought and sold by analytics and ad-tech firms. AntiTrack removes cookies and masks the device's "fingerprint" to prevent third- parties from identifying you and following your behavior across the web.

What are the Product's Features

• AntiFingerprinting stops scripts from fingerprinting the user's device and tracking their browsing behavior across the web. In particular, this

- feature relies on processing of browser version, hardware data, OS version, OS locale and AntiTrack version.
- Privacy Score provides the user with an evaluation of how private they
 are based on various in-app configurations. In particular, this feature
 relies on processing of browser version, hardware data, OS version, OS
 locale, AntiTrack version, In-app settings (such as features that are
 turned on/off).
- **Fingerprint Randomizer** will automatically change the user's digital 'Fingerprint' in regular intervals, or allow the user to manually change said 'Fingerprint'. In particular, this feature relies on processing of browser version, hardware data, OS version, OS locale and AntiTrack version.
- Browser cleanup helps the user manage browsing history and cookies by allowing the user to manually clear this information or schedule an automatic deletion at a specific time. In particular, this feature relies on processing of browser version, hardware data, Cookies, OS version, OS locale, AntiTrack version, In-app settings (such as features that are turned on or off).
- Browser protection helps users stay protected from online tracking attempts and similar threats through supported browsers. Any time a suspicious script (tracking attempt) encounters the user's 'Fingerprint', the user is notified. In particular, this feature relies on processing of browser version, hardware data, OS version, OS locale, website scripts and tracking elements, and AntiTrack version.
- Allowed Websites and whitelisting processes allows the user to add their favorite websites into the Allowed Websites list so that their stored browser data is not be cleared during the automatic and manual cookie clearing process. Additionally, no anti-tracking measures will be active on these websites once they are added to the Allowed Websites list. In particular, this feature relies on processing of whitelisted websites, browser version, hardware data, OS version, OS locale and AntiTrack version.
- System Privacy helps stop third parties from seeing, tracking, and collecting customer information from the supported operating system. Specifically, this is related to the customer's computer login security, protecting files and data on that machine, and keeping the customer's computer activities private. This provides another layer of security by giving the customer the ability to configure their Privacy Settings within AntiTrack. In particular this feature relies on processing of browser

version, hardware data, OS version, OS locale, information about operation system's keys and tasks associated with privacy risks, and AntiTrack version.

Personal Data We Process

We process only the following Service and Device Data (in addition to Billing Data for paid version or Account Data if necessary):

Service Data	What we use it for and for how long
Usage Frequency (e.g., the amount of time the application is in use)	 Service Provision (the earlier lifetime of the account and 24 months) To provide feature enhancement, customer support and product maintenance
Number of Application Launches	 Service Provision (the earlier lifetime of the account and 24 months) To provide product maintenance and customer support
License Key	 Service Provision (the earlier lifetime of the account and 24 months) To regulate access to the product, provide customer support, and administer product updates
	 Service Provision (the earlier lifetime of the account and 24 months) To show Browser Protection and Cookie Cleanup status in the product, and identify the default browser for opening the links from the app.

	 To check the browser extension status (only in supported browsers).
	 When Browser Protection feature from the product is ON, for AntiTrack to obfuscate the following properties of the browser under Anti- Fingerprinting:
	 User-Agent
	o Plugins
	o HTTP Headers
Cookies	Service Provision (the earlier lifetime of the account and 24 months)
	 To identify the "Total (number of) Cookies, and Tracking Cookies" available for a browser
	 To perform the cookie cleanup (delete the cookies, cache, and browser history).
Whitelisted websites	Service Provision (the earlier lifetime of the account and 24 months)
	To add websites into the Allowed Websites list
Website Tracker Details (Javascript, HTML documents)	Service Provision (the earlier lifetime of the account and 24 months)
	 To identify website trackers on the website that the user is visiting and determine if the Javascript/Html is a tracker or not.
	In-product messaging (6 months)
	 To update the user about tracking.

AntiTrack	version	Service Provision (the earlier lifetime of the account and 24 months)
		 To provide user support, troubleshoot
		In-product Messaging (6 months)
		 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
		Product and Business Improvement (24 months)
		 To better understand how users' interact with certain aspects
Install Date or Time	me	Service Provision (the earlier lifetime of the account and 24 months)
		To do license management
		In-product Messaging (6 months)
		 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
		Product and Business Improvement (24 months)
		 To know when to market new features and or products
Crash Incidents		Service Provision (the earlier lifetime of the account and 24 months)
		To ensure continuous functionality

Device Data	What we use it for and for how long

•	Service Provision (the earlier lifetime of the account and 24 months)
	To provide user support, troubleshoot
	Product and Business Improvement
	 When developing new features - to adjust the scope of the feature based upon the requirements and the functionality of certain operating systems (24 months)
	 To better understand how users' interact with certain aspects 24 months)
OS Locale	Service Provision (the earlier lifetime of the account and 24 months)
	 To segment updates by location
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (24 months)
	 To determine which segments of our users to roll out a new feature or product
	 To better understand how users' interact with certain aspects
`	Service Provision (the earlier lifetime of the account and 24 months)
	 To install the product, provide application updates, customer support
	Product and Business Improvement (24 months)
	 To better understand how users' interact with certain aspects

The third party analytics tool we use for the AntiTrack Mac platform is <u>App</u> <u>Center</u>. For further information regarding our third party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.

Battery Saver

Official Product Name

Avast Battery Saver for Windows

Core Functionality

Battery Saver is a tool designed to extend the battery life of your PC by reducing internal and external power demands.

What are Product's Features

• Battery Saver (profiles) creates a power plan profile to apply the predefined set of various settings which shall reduce the amount of power consumed by the PC.

Personal Data We Process

While using Battery Saver, we collect and process the following Service and Device Data (in addition to Billing Data or Account Data if relevant):

Service Data		What we use it for and for how long	
		Service Provision (up to 12 months)	
Events and	n vo du ot	To monitor service functionality	
Events and usage	product	In-product Messaging (12 months)	
		 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	

Product and Business Improvement			
 To better understand our users' behavior (1 months) 			
 To improve users' overall experience by developing new features or products (up to 12 months) 			

Device Data	What we use it for and for how long	
	Service Provision (up to 12 months)	
	To monitor service functionality	
Internal online identifiers (GUID,	In-product Messaging (12 months)	
MIDEX, UUID)	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	
	Service Provision (12 months)	
device (platform, computer type, vendor, model, brightness,	 To check for compatibility issues in automated crash dumps 	
wifi_status,	In-product Messaging (12 months)	
bluetooth_status, battery, capacity, state, lifetime, critical bias, cycle count, voltage,	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	
granularity,	Product and Business Improvement (12 months)	
manufacturer date)	To better understand users' behavior	
	 To introduce a new feature or product based on previous experience 	
Location	Service Provision (up to 12 months)	
(country, region, city, latitude, longitude, internet service	TOT WINDOWS	

	In-product Messaging (12 months)	
autonomous system)	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	
	Product and Business Improvement (12 months)	
	 To better understand users' behavior based on approximate location 	
	 To introduce a new feature or product based on approximate location 	
Other Avast	Service Provision (12 months)	
products/licenses on the device and their status	 To recognize what features should be enabled or disabled, what product should be installed or uninstalled 	
	In-product Messaging (12 months)	
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	

The third-party analytics tool we use for Battery Saver is <u>Google Analytics</u>. For further information regarding our third-party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.

BreachGuard

Official Product Name

BreachGuard

Core Functionality

Our goal is to enable people to take back their privacy online. Remediate past breaches and minimise the risk of abuse of their data in the future. We aim to

provide convenient solutions for everyday life online without sacrificing privacy.

- 1. Enabling users to discover and fix online privacy threats.
- 2. Prevent data collection by advertising companies and data brokers, depending on region.
- 3. Educating users about privacy and security online.

What are Product's Features

- Risk Monitor is 24/7 dark web monitoring for leaked personal information. BreachGuard leverages the most comprehensive database of the dark web it detects whether users have been compromised in a breach and their information is exposed on the dark web. If we identify new breaches we alert you based on the email address you submitted. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here. The feature also has the capability, if you consent, to scan your browser for weak, reused or breached passwords and provides instructions to fix these passwords.
- Personal info remover submits opt-out requests to data brokers in North America. This feature processes names (first name, middle name, last name), address (street, city, country, state, zip code), phone number, email and Date of Birth (DOB). The reason for this is that data broker opt-out forms require some of, if not all of the information to submit a valid opt-out request and verify that you are, in fact in their database. As a result, we collect this basic information from you to submit the opt-out requests on your behalf.
- Privacy Advisor provides updates and guidance related to online privacy, including but not limited to: recent data breaches and guides to optimize your privacy for social media sites and other common services. If you opt-in, this functionality will process your bookmarks and browsing history to improve the quality of content so we can distinguish guides which are relevant to you (we are not processing full urls but we need only the domain name).
- Identity Assist We have partnered with a third party, Generali Global Assistance, to provide Identity Assist in BreachGuard. The service consists of two sub-features, ScamAssist and Identity Resolution. ScamAssist specialists act as trusted advisors to customers by helping them identify which of the solicitations they have received are potentially fraudulent. Resolution Specialists are available 24/7/365 to educate

customers about how identity theft and cyber crimes occur, as well as provide tips and tools to help keep their identity and digital privacy secure. Note we do not process any personal data from your interaction with Generali, Generali does, see its privacy policy <u>here</u>.

Personal Data We Process

By default, BreachGuard processes locally on your system the following data:

- Names (first name, middle name, last name), address (street, city, country, state, zip code), phone number, email and date of birth to send data opt-out requests on your behalf via Personal Info Remover.
- Browser credentials (website, username, password) to scan your browser for weak, reused or breached passwords and provide instructions how to fix

This data is not sent to our environment.

While using BreachGuard service, we collect and process data in our environment about you and your device in the following situations:

Service Data	What we use it for and for how long	
	 Service Provision (6 months) To display relevant privacy guides Product and Business Improvement (6 months) For development of new features or products 	
usage (app metadata, page views, clicks,	 Product and Business Improvement (39 months) For development of new features or products 	

Device Data	What we use it for and for how long
OS Version, BreachGuard Application Version, Activation Key	Service Provision (24 months) ● For users' support and troubleshooting In-product Messaging (24 months)

E.g. Windows 10, BreachGuard v1.2.0	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem Product and Business Improvement (39 months) For development of new features or products To understand the users' behavior and product development planning
OS Locale	 Service Provision (24 months) For users' support and troubleshooting as well as rendering the data broker removal service Product and Business Improvement (39 months) For development of new features or products
e.g. Device Model (e.g. Windows 10 (13-inch 2017), RAM (Random Access Memory), GPU (Graphical Processing Unit), and Central Processing Unit (CPU)	Service Provision (24 months) • For users' support and troubleshooting Product and Business Improvement (39 months) • For development of new features or products

Cleanup

Cleanup for Desktop (Windows, Mac)

Official Product Name

<u>Avast Cleanup Premium</u>, <u>Avast Cleanup Premium for Mac</u> (collectively as "Cleanup for Desktop")

Core Functionality

Cleanup for Desktop is an ultimate tune-up program which speeds up and cleans your PC (Windows and Mac), updates installed apps, and fixes other problems.

What are Product's Features

Avast Cleanup Premium for Windows:

- Maintenance scans and deletes registry items, shortcuts, system and programs temp or unnecessary files, browser caches, history and cookies.
- **Program Deactivators** scans and disables installed third-party programs which have background, startup or scheduled tasks.
- Software, Disk or Browser Cleaner scan and temporarily hide or uninstall third-party programs, deletes unnecessary files from disk or browser history.
- **Fix Problems** scans and fixes common Windows problems which might put PC at risk (e.g. missing Windows updates, administrative shares on public folders).
- **Disk Doctor** or **Defrag** scans for potential errors and fixes system drive or defrags your system drive.
- **Software Updater** scans and updates third-party programs and their versions installed on PC.

Avast Cleanup Premium for Mac:

- Clutter Scan scans and deletes application caches, log files, trash, downloads folder, development junk. It looks for similar data on connected external drives as well. Only data on the amount of KB and cleaned is processed.
- Find Duplicates scans for duplicate files in directories selected by you.
 Only data on the amount of KB and duplicate files found and cleaned is processed.
- **Find Photos** scans photos and evaluates their quality and similarity to help you decide which you want to keep. Only data on the amount of KB and photos found and cleaned is processed.
- Uninstall Apps scans and removes applications and programs for which
 it is necessary to process app name, size, version and last date of its
 usage.

Personal Data We Process

While using Cleanup for Desktop, we collect and process the following Service and Device Data (in addition to Billing Data or Account Data if relevant):

Service Data	What we use it for and for how long
Events and product usage	Service Provision (up to 12 months)
(such as product version,	To monitor service functionality
product language, license type, days to expiration,	In-product Messaging (12 months)
number of potentia problems or detected junk)	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand our users' behavior (12 months)
	 To improve users' overall experience by developing new features or products (up to 12 months)

Device Data	What we use it for and for how long	
Internal online identifiers (GUID, MIDEX, UUID, Device ID)	 Service Provision (up to 12 months) To identify correct installation In-product Messaging (12 months) To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 	

Information		concerning	
device (plat	form, t	ypes	of
cleaning o	bjects,	objec	cts
size, app	name,	vendo	or,
version, rati	ng, certi	ification	า)

Service Provision (up to 12 months)

 To check for compatibility issues in automated crash dumps

In-product Messaging (12 months)

 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement (up to 12 months)

- To better understand users' behavior
- To introduce a new feature or product based on previous experience

Location (country, region, city, latitude, longitude, internet service provider, internet autonomous system)

Service Provision (up to 12 months)

 To set up a proper product language version for Windows

In-product Messaging (12 months)

 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement (12 months)

- To better understand users' behavior based on approximate location
- To introduce a new feature or product based on approximate location

Applications (our other products, installed applications on a user's computer)

other | **Service Provision** (up to 12 months)

- Our other apps to know which products users already have on their computer
- Third-party applications or programs installed on users' computers to improve Cleanup Sleep Mode, Software Cleanup and Software Updater functionality

In-product Messaging (12 months)

 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement (up to 12 months)

- To improve the users' overall experience by developing new features and products
- To understand/estimate market opportunity for new products and new features

The third-party analytics tool we use for Cleanup for Desktop is <u>Google Analytics</u>. For further information regarding our third-party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.

Cleanup for Mobile (Android)

Official Product Name

<u>Avast Cleanup</u>, <u>Avast Cleanup Premium</u> (collectively as "Cleanup for Mobile (Android)")

Core Functionality

Cleanup for Mobile (Android) detects and removes unnecessary files to free up storage space. Equally, it can stop running processes to optimize device performance.

What are Product's Features

- **App Overview** allows to browse installed and pre-installed applications, provides functionality to uninstall or stop. In particular, this feature relies on processing device provided stats about other apps. These stats are processed locally (on device) in order to provide the service.
- **Media Overview** provides an overview of files broken down by type (eg images, audio files, video). This feature does not need any specific data processing outside of operations made locally (on device).
- Battery Saver allows you to select conditions where desired actions (system settings changes) should be applied by this product. For example one can automatically decrease screen brightness when at home. Location based condition require permission to get location data, however these data are never transmitted from the device and all are processed locally.
- Cloud Transfers allows you to backup their files to an external cloud storage. We are using Google Drive and Dropbox APIs to do so, e.g. you can login using their Google or Dropbox credentials to establish such connections. Note credentials are not visible to us.

Personal Data We Process

While using Cleanup for Mobile (Android), we collect and process the following Service and Device Data (in addition to Billing Data for paid version):

Service Data	What we use it for and for how long
Identifier of the content (message) being delivered	Service Provision (36 months) • To monitor service functionality
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

	Product and Business Improvement (14 months) • To monitor messaging performance
	• To monitor messaging penomiance
IP address	Service Provision (36 months)
	 Replaced with city/country for delivering geo- specific changes to app's configuration (both local or remote)
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (14
	months)
	To monitor messaging performance
Events and product usage	Service Provision (36 months)
	 To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	To better understand our users' behavior and users' acquisition (14 months)

•	To consider roadmap for type of features
	and products we want to develop in future
	(36 months)

Device Data	What we use it for and for how long
Online identifiers (GUID, Device ID (Android ID), Hardware ID, Profile ID, Advertising ID)	 For counting users, ensuring functionality and stability In-product Messaging (24 months) To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem Product and Business Improvement To better understand our users' behavior (14 months) To recognize reinstalls of the app on the same device (39 months) Third-party Ads (not stored after provision) We process Advertising ID only for IronSource which allows it to place advertisements
Information concerning computer or device (carrier, OS version, OS build number, hardware ID, device model, device brand, device manufacturer, device API level)	 Service Provision (36 months) To ensure functionalities of the product and its features In-product Messaging (6 months) To inform users of problems that will not be solved by the currently installed product and

	to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand our users' behavior (14 months)
	 To determine whether a new feature or product should be developed for subset of users (36 months)
` `	Service Provision (36 months)
longitude and latitude)	 Delivering geo-specific changes to app's configuration (both local or remote)
	 Related to Battery Profile feature, as users can set being in a certain location as a trigger to automatically launch a Battery saving profile.
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior based on approximate location (14 months)
	 To introduce a new feature or product based on approximate location (36 months)
Applications	Service provision (36 months)
	 To provide insights, such as usage stats to help identify unused apps (storage cleaning opportunity), drain impact (battery, data) to help identify apps that have significant effect on device resources, or notification stats to

	help identify "noisy" apps which can be "muted" by links to system settings
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (14 months)
	To better understand users' behavior
Internet and connection	Service provision (36 months)
	 For functionality of our features, providing error messaging
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (14 months)
	 To introduce a new feature or product based on previous experience (36 months)

These are the third-party analytics tools we use for Cleanup for Mobile (Android):

- Google Firebase Analytics and Crashlytics for Android
- AppsFlyer

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

The free version of Cleanup for Mobile (Android) serves relevant third-party advertisements. These are the advertising partners we use for this product:

- Google AdMob
- Amazon
- Facebook Audience Network
- InMobi
- AppLovin
- Unity Technologies
- IronSource

For further information regarding our third-party ads partners, including their privacy policies, please refer to our <u>Consent Policy</u>.

Driver Updater

Official Product Name

Avast Driver Updater

Core Functionality

Driver Updater provides scan and potential update or fix of outdated drivers on a users' PC to optimize it for better performance and avoid potential crashes or malfunctions.

Personal Data We Process

While using our Driver Updater services, we collect and process data about you in the following situations:

Service Data	What we use it for and for how long

Identifier of the content (message) being delivered	Service Provision (12 months)
	To monitor service functionality
	In-product Messaging (12 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (12 months)
	To monitor messaging performance
Events and product usage	Service Provision (12 months)
	 To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product
	In-product Messaging (12 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (12 months)
	To better understand our users' behavior
	To introduce a new feature or product based on previous experience

Device Data	What we use it for and for how long
Online identifiers (GUID, MIDEX, UUID, Device ID)	 Service Provision (12 months) For ensuring continuous functionality and breaking down entries in database

	In-product Messaging (12 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (12 months)
	To better understand our users' behavior
	 To introduce a new feature or product based on previous experience
Information concerning device (type, vendor, model, manufacturer, version)	Service Provision (12 months)
	To check for compatibility issues in automated crash dumps
10.0.0,	In-product Messaging (12 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (12 months)
	To better understand users' behavior
	 To introduce a new feature or product based on previous experience
	Service Provision (12 months)
drivers (driver version, updated	To monitor service functionality
date, name, matching	In-product Messaging (12 months)
device id, driver rank, driver flags)	 To inform users of problems that will not be solved by the currently installed product

	and to offer users a solution to the detected problem
	Product and Business Improvement (12 months)
	To better understand our users' behavior
	 To introduce a new feature or product based on previous experience
Location	Service Provision (12 months)
(country, region, city, latitude, longitude, internet service provider, internet	version for vyindows
autonomous system)	In-product Messaging (12 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (12 months)
	 To better understand users' behavior based on approximate location
	 To introduce a new feature or product based on approximate location
	Service Provision (12 months)
products/licenses on the device and their status	 To recognize what features should be enabled or disabled, what product should be installed or uninstalled
	In-product Messaging (12 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

The third-party analytics tools we use for Driver Updater for Desktop is <u>Google Analytics</u>. For further information regarding our third-party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.

Family Space

Official Product Name

Avast Family Space

Core Functionality

Avast Family Space is a free mobile application for Android and iOS which keeps your kids safe both online and off with its advanced parental controls and location features.

Personal Data We Process and Features

While using Family Space, we process the following Service and Device Data (in addition to Billing Data and Account Data):

1. Location feature

Parents are able to install the parent's app on their own device and kids app on children's devices. After activation, parents are able to locate their children on demand or set up automatic location alerts based on time or geofencing. Parents have the option to share their own location as well.

Location Data Feature	What we use it for and for how long
Child location	Service Provision (12 months)
	 We collect the child's geolocation GPS coordinates while the app is running in the foreground and background in order to show parents the child's current location, last- known location, and location history

	parents New Product Development (12 months)
	 such as home or school Time spent at unsaved locations may be used to recommend a new saved location to
	 Parents can enter a saved location for use in geofencing alerts. They can be alerted when a child enters or exits that saved location,
Saved locations	Service Provision (12 months)
	We track behavior such as turning this setting on or off, but we don't send location coordinates to third party analytics services
	Product and Business Improvement (up to 24 months)
	Parents can find a setting to share their location with all family members, other parents or off. The setting is off by default
Parent location	Service Provision (12 months)
	We use this data to train machine learning algorithms to notify parents when a child is in an unexpected place at a given time
	Product and Business Improvement (12 months)
	If the child has more than one device paired, location data is only collected from the most recently-used device
	 Children can also send their location from within the app. For example, Check-In and Pick Me Up are features that send the current location

• :	Saved Locations may be used in machine
l	learning location anomaly detection. For
(example, when a child is at a saved location,
i	it may not warrant an alert about unexpected
I	behavior

Product and Business Improvement (up to 24 months)

 We track feature usage data to third parties for analytics, but not names or locations of saved places

2. Activity feature

Parents are able to view web and app activity from their children's devices. The summary view categorizes connections made by category and the list view shows specific usage information.

Activity Data Feature		What we use it for and for how long
DNS connections and app usage	, device	 When the child device is connected to our VPN, the device's IP address and DNS connection information are stored by our partner for 24 hours and then by us for 12 months. We also collect information about whether the device is locked, and whether the screen is on. On Android we also collect device and app usage information from the system. Together these records are used to present a summary and list view of your child's device, web, and app usage We collect the list of installed apps from the child's device to display to parents. We may notify the parent when a new

<u></u>
app is installed. We do not share the complete app list with any third parties.
 We may alert parents to activity that might warrant attention, such as activity during late night hours, accessing objectionable content, or spending a lot of time on a new activity
 We may also display the same information to child app users for greater transparency
Product and Business Improvement (12 months)
We use DNS usage history to develop machine learning models which will be used to notify the parent in case of usage anomalies that might warrant attention
 We use this data to develop machine learning models to predict how much time the child spends in each app, and on each device

The third-party tool which we use for DNS lookup and content blocking is Akamai. For further information regarding this partner, please refer to their Privacy Policy.

3. Controls feature

Parents are able to block access to unwanted apps and websites individually or by category. Parents can pause and restore Internet access on demand.

Controls Data Feature	What we use it for and for how long
Settings	Service Provision (the lifetime of account)
	To store parents' settings of blocked apps

and websites in order to synchronize them across devices and apply the rules to children's devices
 We may provide the option to limit the time spent in each app, content category or device
Product and Business Improvement
We track feature usage data to third parties for analytics (up to 24 months)
Service Provision (the lifetime of account)
 To store logs of when parents paused and resumed child access to the internet in order to provide customer support and understand usage behavior
Product and Business Improvement
 We track feature usage data to third parties for analytics (up to 24 months)

4. Family setup

As a family app running on multiple devices, configuring your family profile is a required step.

Family Setup Data	What we use it for and for how long
Names and photos	 Service Provision (the lifetime of account or profile) Parents can enter any name and photo they wish for each family member. This information is then displayed on the devices of other family members as well

	Product and Business Improvement (up to 24 months) • We track usage information to third parties for analytics, but we don't send names or photos
Email addresses of secondary parents	 Service Provision (the lifetime of account or profile) The primary parent must enter the email address of additional parents who wish to join the family. This is a security measure taken to ensure that only the invited parent is able to join. Email verification is required of all parents
Roles	 Service Provision (the lifetime of account or profile) Each family member is assigned a Child or Parent role, depending on the configuration when family members are invited to join the family
MSISDN (mobile phone number)	 Service Provision (30 days) For white-labeled versions of the app license sold through partner carriers serves as unique ID connected with For customer service purpose to verify that the user contacting customer support has valid and working license for the product

We use third-party analytics tools for additional product insights. You can opt out of this collection in the product settings. These are the third-party analytics tools we use for Family Space:

- Amplitude
- Google Firebase and Crashlytics

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

HackCheck

Core Functionality

HackCheck is a website that allows users to input their email address into a form and check to see if their passwords have been stolen and published on the dark web. The email address is also registered for 24/7 monitoring and alerting which will send the user an email as soon as a password leak has been detected. Users can unsubscribe from this monitoring anytime.

Lastly, HackCheck offers some security tips and directions when or if your passwords have been compromised.

What are Product's Features

- Has my password been stolen? which checks the database operated by our partner SpyCloud against the email address the user provided to see if the user's passwords have been leaked and sends an email to the user if the passwords leaked.
- 24/7 Automatic Email Alerts which monitors the SpyCloud database and will send the user an email anytime their passwords show up in the SpyCloud database.

Personal Data We Process

If you wish to use the HackCheck, you submit your email address so we can send you alerts about the passwords that have leaked based on results from SpyCloud Database. This email address is used by us for the purposes of service provision, cross-promotion of our other products and optimization of the service to help us understand how you use our product (e.g. number of detections per email).

Your email address is stored for as long as you use our service, as it is necessary for us to provide it. Should you choose to unsubscribe from our email list your email will be deleted and you will not receive any further emails from us.

The database of leaked passwords is operated by our partner SpyCloud. For further information please refer to its privacy policy <u>here</u>.

Business Hub

Official Product Name

Avast Business Hub

Core Functionality

The Business Hub makes it easy to deploy various protection services to multiple devices, manage all devices from one place, mix and match device types, schedule regular scans, and quickly add more devices.

Please note that through the Business Hub certain settings related to privacy are managed by and information from managed devices is accessible to the administrator of the console or the Managed Service Provider you chose. You, as a user, are informed about the role of the administrator during the installation. Businesses are responsible for informing you about this fact and instructing administrators about best practices to ensure users' privacy.

What are Product's Features

- Monitor Device Security uses the console to monitor the health of all managed devices from one place, reviews the number of blocked threats, schedules regular scans, and more.
- Management Dashboard activates devices, adds devices to groups, configures antivirus settings, and views blocked threats from an easy-toread dashboard.
- Master Agent selects a device as the Local Update Server where all updates can be downloaded and saves bandwidth by scheduling and distributing updates to all endpoints in your network when it's convenient.
- Tasks sets up security tasks for all managed endpoints, such as scans, messages, updates, and shutdowns to ensure optimal security for the entire network.
- **Updates** remotely downloads and distributes virus and program updates to all devices from one console to save time and bandwidth.
- **Notifications** receives instant email notifications on any security threats or network issues that need your attention, including outdated antivirus applications, extended device inactivity, and additional device update.

- Reporting views detailed reports that include blocked threats, task lists, and protected devices, making it simple to improve security and customize protection.
- Subscriptions Overview lists all valid subscriptions and licenses.
- **Network Discovery** scans your network for connected devices to bring visibility over what devices should be taken care of.
- Cloud Backup securely stores selected data in the cloud as backup in case of data loss or disaster resulting in data loss/damage.
- Remote Control enables IT admins to quickly and securely connect to a user's device, access files and applications, and help troubleshoot issues in real time.
- Patch Management scans for missing operating system updates and third-party application patches and enables remote installation of those patches to resolve application vulnerabilities of endpoints.
- **Content Filtering** boosts productivity and security by controlling your employees' internet usage and allowing to restrict their access to specific websites or website categories.
- USB Protection is a service allowing you to control access to USB flash drives, external HDDs, optical discs, memory cards, digital cameras, smartphones (Windows only), tablets (Windows only), and other devices that have storage capabilities. With this service, removable devices won't be able to access your end users' data without permission.

Personal Data We Process

We process only the following Data (in addition to Account Data and Billing Data, if you purchased paid services or products from us):

Device Data	What we use it for
Internal online identifiers (Device ID)	 Service Provision For ensuring continuous functionality and breaking down entries in database Product and Business Improvement To better understand our users' behavior To introduce a new feature or product based on previous experience
Device name, brand, type, removable device name and serial number (for USB Protection)	To better identify and manage devices

	To determine whether it supports installation of Avast services
Information concerning computer or device (OS build, display)	 Service Provision To check for compatibility issues in automated crash and agent log dumps Product and Business Improvement To better understand users' behavior To introduce a new feature or product based on previous experience
Applications	Service Provision ■ To determine which application needs to be updated, to provide support and troubleshooting
Files, content	Service Provision • To provide cloud backup
Internet and connection / Network data / Number of devices on Network	 Service Provision For security prerequisites (e.g. DNS settings check, port restrictions enabling or remote deployment) Product and Business Improvement To introduce a new feature or product based on previous experience
Location, IP and MAC addresses	Service Provision • For admins to have a possibility to localize their devices
Device status (last connection to Avast)	Service Provision • For admins to see which devices were active and when and determine the risk profile
Location	Service Provision • To set up a proper product language version In-product Messaging

	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem Product and Business Improvement To better understand users' behavior based on approximate location To introduce a new feature or product based on approximate location
Language, time zone	Service Provision

Service Data	What we use it for
Identifier of the content (message) being delivered	
Detections	Service Provision • For administrators to review and analyze what threats were detected in the network, files or emails
URLs	Service Provision • For protection, detection and blocking of malicious or restricted content
Our other products/licenses on the device and their status	Service Provision • For administrators to have an overview of running services and expiration dates

	•
Events and product usage	 To provide reporting capability for admins and to ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product In-product Messaging To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem Product and Business Improvement To better understand our users' behavior To introduce a new feature or product based on previous experience
Audit Logs	Service Provision ∉ To provide record of changes in application and endpoints

Admin and User Data	What we use it for
Name, surname, email address, locales	Service provision • To provide access and services, possibility to send reports or notifications about security events or product updates
User access rights	Service provisionTo provide access to the product

Company Data	What we use it for
Name, business, finance and tax details and contact information	
Business type	Service Provision ■ To offer the right solution based on the type of the company

We will process the data described above only as long as necessary for the purposes we described. We delete the data we collected within 60 days after the termination of the service.

We cooperate with the following third parties when providing our services:

- The Cloud Backup service is provided in cooperation with Infrascale Inc. See their Privacy Policy.
- The Remote Control service is provided in cooperation with XLAB d.o.o. See their Privacy Policy.

The third-party analytics tool we use for the Business Hub are <u>Google Analytics</u>, <u>Hotjar</u>, <u>Medallia</u>. For further information regarding our third-party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.

CloudCare

Official Product Name

Avast Business CloudCare

Core Functionality

CloudCare makes it easy to deploy various protection services to multiple devices, manage all devices from one place, mix and match device types,

schedule regular scans, and quickly add more devices It also allows you to purchase subscriptions and manage them conveniently from a single platform.

Please note that, through CloudCare, certain settings related to privacy are managed by and information from managed devices is accessible to the administrator of the console or the Managed Service Provider you chose. You, as a user, are informed about the role of the administrator during the installation. Businesses are responsible for informing you about this fact and instructing administrators about best practices to ensure users' privacy.

What are Product's Features

- Dashboard allows you to monitor the status of the managed devices, including their security, allocation of subscriptions and service usage.
- Alerts allow you to configure and customize alerts which, if triggered by certain events, will be sent to selected users by email and/or texted to mobile numbers (available for selected wireless service providers).
- Devices provide detailed information on the status and active services for each enrolled device. It gives you the tools to deploy CloudCare services to more devices.
- **Policies** give you the ability to define sets of rules and settings for each service that will be enforced on the endpoint devices.
- Account and services allow you to view and manage the information we store about your company, users and companies that you added to the platform. It also allows you to buy and manage subscriptions that entitle you to use particular service on a particular set of devices.
- **Community forum** allows CloudCare partners to discuss their issues, needs, and provide feedback on CloudCare. This forum is also attended by our customer care staff.
- Master Agent selects a device as the Local Update Server where all updates can be downloaded and saves bandwidth by scheduling and distributing updates to all endpoints in your network when it's convenient.
- **Updates** remotely downloads and distributes virus and program updates to all devices from one console to save time and bandwidth.
- **Reports** provide on-demand summary of blocked threats, task lists, and protected devices, making it simple to improve security and customize the protection.
- Online Backup securely stores selected data in the cloud as backup in case of data loss or disaster resulting in data loss/damage.

- Remote Control enables IT admins to quickly and securely connect to a user's device, access files and applications, and help troubleshoot issues in real time.
- **Patch Management** scans for missing operating system updates and third-party application patches and enables remote installation of those patches to resolve application vulnerabilities of endpoints.
- Secure Web Gateway inspects all web connections using DNS-layer protection and full web proxy. It also inspects full SSL and non-SSL paths for risky and new sites.
- Content Filtering boosts productivity and security by controlling your employees' internet usage, helps prevent devices from accessing malicious content, and allows the admin to restrict access to specific sites or content categories.

Personal Data We Process

We process the following Data (in addition to Account Data and Billing Data, if you purchased paid services or products from us):

Device Data	What we use it for
Internal online identifiers (Device ID)	Service Provision • For ensuring continuous functionality and breaking down entries in database
	Product and Business Improvement To better understand our users' behavior To introduce a new feature or product based on previous experience
Device name, brand, type,	 Service Provision For users to better identify devices detected on the network To determine whether it supports installation of Avast services
Information concerning computer or device	Service Provision • To check for compatibility issues in automated crash and agent log dumps
	Product and Business Improvement To better understand users' behavior

	To introduce a new feature or product based on previous experience
Applications	Service Provision • To determine which application needs to be updated, to provide support and troubleshooting
Files, content	Service Provision To provide Online Backup
Location, IP and MAC addresses	Service Provision • For admins to have a possibility to localize their devices
Device status (last connection to Avast)	Service Provision • For admins to see which devices were active and when and determine the risk profile
Location	Service Provision • To set up a proper product language version
	In-product Messaging ■ To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	 Product and Business Improvement To better understand users' behavior based on approximate location To introduce a new feature or product based on approximate location
Language, time zone	Service Provision • To set the right language settings

Service Data	What we use it for
Identifier of the content (message) being delivered	
Detections	Service Provision • For administrators to review and analyze what threats were detected in the network, files or emails
URLs	Service Provision • For protection, detection and blocking of malicious or restricted content
Other Avast products/licenses on the device and their status	Service Provision • For administrators to have an overview of running services and expiration dates
Internet and connection / Network data / Number of devices on Network	
	Product and Business Improvement To introduce a new feature or product based on previous experience
Events and product usage	Service Provision • To provide reporting capability for admins and to ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product
	In-product Messaging ■ To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

	 Product and Business Improvement To better understand our users' behavior To introduce a new feature or product based on previous experience
Audit Logs	Service Provision • To provide record of changes in application and endpoints

Admin and User Data	What we use it for
Name, surname, email address, locales	Service provision • To provide access and services, possibility to send reports or notifications about security events or product updates
User access rights	Service provision To provide access to the product

Company Data	What we use it for
Name, business, finance and tax details and contact information	
Business type	Service Provision • To offer the right solution based on the type of the company

We will process the data described above only as long as necessary for the purposes we described. We delete the data we collected within 60 days after the termination of the service.

We cooperate with the following third parties when providing our services:

• The Cloud Backup service is provided in cooperation with Infrascale Inc. See their Privacy Policy.

- The Remote Control service is provided in cooperation with XLAB d.o.o.
 See their <u>Privacy Policy</u>.
- The Secure Web Gateway service is provided by Zscaler, Inc. See their Privacy Policy.
- Payments are processed by our partner BrainTree. See their <u>Privacy</u> <u>Policy</u>.

News Companion

Product Name

Avast News Companion - free browser extension for Chromium-based browsers across all platforms.

Core Functionality and Features

Avast News Companion helps you to check your sources for biases and accurate reporting. It alerts you when sites have a known political bias. Bias categories range from Left to Right, but we'll also tell you about scientific, satiric, and questionable sources. With this extension you make sure you're reading the facts. Avast News Companion uses algorithms that analyze factual reporting, and check the statements from the articles against fact-checking databases. Based on that you'll get alerted about misleading claims or incorrect news. We have a full list of the websites where we track reading. Download it here.

Personal Data We Process

While using Avast News Companion, we collect and process the following Service and Device Data:

Service Data	What we use it for and for how long
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Selected URLs	Service Provision (30 days) ■ To display claims related to articles read on selected news websites you're visiting Product and Business Improvement (up to 36 months) ■ To improve users' overall experience by developing new features or products by analyzing aggregated URLs counts
User's feedback (rating, comments)	 Service Provision (36 months) To tell whether the site rating and classification you received are relevant and up-to-date Product and Business Improvement (36 months) To improve the product or its feature based on the user's feedback
Events and product usage (open extension, rated site, change settings)	To measure user's behavior in UI and how

Device Data	What we use it for and for how long
Internal extension identifier (GUID)	 Service Provision (up to 36 months) To monitor service functionality and provide users with reading reports Product and Business Improvement (36 months) To measure product telemetry, and calculate statistics
Extension information (installation source and time, version and campaign ID)	

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The third-party analytics tool we use for News Companion is Mixpanel. For further information regarding our third-party analytics partner, including its privacy policy, please refer to our <u>Privacy Policy</u>.



Official Product Name

Avast Omni

Core Functionality

Omni provides protection and insights for all connected devices in the home and on the go, through a combined hardware-software solution that easily connects to the existing home router without impacting Wi-Fi performance.

What are Product's Features

- Home Network Protection enables users to find out which people and what devices are connected to their home network. Omni provides alerts if unusual behavior is detected on any device, and blocks hackers trying to access any device. It connects to the home router, meaning users do not need to replace their router or compromise on their choice of router.
- On-the-go Security extends Antivirus protection seamlessly to mobile devices including Windows, Mac, Android and iOS to secure them outside the home.
- Parental Controls serve families to filter content and apps that children can access including social media and videos. They can also pause gaming or the internet at any time. Geo-location services help keep track

of children with the option to set up alerts for when they leave or arrive at certain places.

Personal Data We Process

Avast Omni integrates features of <u>Family Space</u>, <u>Antivirus for Desktop</u>, <u>Antivirus for Mobile (Android)</u>, <u>Antivirus for Mobile (iOS)</u> and Network Security. For further information regarding data associated with Avast Omni please see portraits of those products.

Network Security

In order for Avast Omni to protect devices on user's local network, we collect and process the following Service and Device Data (in addition to Account and Billing Data, if relevant):

Service Data	What we use it for and for how long
Identifier of the content (message) being delivered	Service Provision (36 months)
	To monitor service functionality
	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (up to 50 months)
	To monitor messaging performance
IP address	Service Provision (36 months)
	 Part of malware infection file, replaced in 30 days with city/country to detect the approximate location of malicious software
Samples, files	Service Provision (36 months)

	 For protection, analysis, detection, blocking, quarantining and deleting of malicious software
Detections	Service Provision (36 months)
	 For protection, detection, blocking, quarantining and deleting of malicious software
URLs and referrers	Service Provision (36 months)
	 For protection, detection, blocking, quarantining and deleting of malicious software
Events and product usage	Service Provision (36 months)
	 To ensure functionality (installations, versions, updates, settings), map how users interact with the app and improve its design or flows
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behaviors (up to 50 months)
	 Learnings from one product usage data may have an effect on the design or layout of the new one (36 months)

Device Data	What we use it for

Online identifiers (GUID, Device ID, MAC address)	Service Provision (36 months)
	 For ensuring continuous functionality and breaking down entries in database
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (up to 50 months)
	 To introduce a new feature or product based on previous experience (36 months)
MSISDN (Mobile phone	Service Provision (30 days)
number)	 For white-labeled versions of the app sold through partner carriers serves ss unique ID connected with license
	 For customer service purpose to verify that the user contacting customer support has valid and working license for the product
Information concerning	Service Provision (36 months)
computer or device	To check for compatibility issues in automated crash dumps
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

	Product and Business Improvement
	To better understand users' behavior (up to 50 months)
	 To introduce a new feature or product based on previous experience (36 months)
GEO data / locale data	Service Provision (36 months)
	 Setting up a proper product language version for Windows
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (36 months)
	To introduce a new feature or product based on country
	Service Provision (36 months)
SW / antiviruses present	To determine how Antivirus should behave
Applications on the device	Service Provision (36 months)
	 Used for defining rules of how Antivirus should behave in relation to other SW installed (e.g. exceptions in scanning, filtering, notifications, applying Do not Disturb rules)
	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed product

	and to offer users a solution to the detected problem
Other Avast products/licenses on the device and their status	Service Provision (36 months)
	 To recognize what features should be enabled or disabled, what product should be installed or uninstalled
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
Internet and connection /	Service Provision (36 months)
Network data / Number of devices on Network	 Security prerequisites (e.g. DNS settings check, port restrictions enabling or disabling Security status check of devices on the network)
	In-product Messaging (6 months)
	 Suitable offering in case these products might increase security or privacy of the given connection, network type etc.
	Product and Business Improvement (36 months)
	 To introduce a new feature or product based on previous experience
Browsers (installed, default)	Service Provision (36 months)
	For opening content in given browser
	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed product

and to offer users a solution to the detected problem

Product and Business Improvement

- To better understand users' behavior (up to 50 months)
- To introduce a new feature or product based on previous experience (36 months)

Note that samples (files, URLs) used for malware analysis are kept in our systems as long as it is necessary to ensure proper functionality of the AV product. These samples are not connected with any identifiers or individuals and the retention periods indicated above do not apply to this use.

The third-party analytics tools we use for Omni are:

- Amplitude on iOS and Android
- Google Fabric Crashlytics on iOS and Android
- AppsFlyer Analytics for iOS and Android
- Google Analytics

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

Avast One

Avast One for Mobile (Android)

Official Product Name

<u>Avast One Essential</u>, <u>Avast One Individual</u>, <u>Avast One Family</u> (collectively as "Avast One (Android)")

Core Functionality

Avast One (Android) provides a comprehensive set of features protecting users against potential security and privacy threats, and features for optimizing device's performance.

What are Product's Features

- Device Scan scans your device or a specific file for malware apps and files and various types of security vulnerabilities.
- Malware Shields constantly scans all new apps and files being downloaded to the device for malware.
- **VPN** feature protects your privacy by encrypting your online communication so no one can spy on what you're doing online. It allows you to pick a specific location to be connected from.
- Wi-Fi Scan enables you to scan your network for vulnerabilities and encourages you to connect to VPN if any issues are detected.
- **Web Shield** detects and notifies you when accessing a malicious website that could represent a potential security risk for you.
- Data Breach Scan and Monitoring looks for leaked personal information, whether your data has been compromised in a breach and your information is exposed on the dark web. If we identify new breaches we alert you based on the email address you submitted. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here.
- Performance Scan analyzes the space on your device and displays the amount of storage space that is being used by junk files. Also, it detects apps running in the background of your device that can be stopped in order to free up the device's memory and speed it up.
- Online Safety Score analyzes data collected by Avast One such as files scanned for malware and websites scanned for dangerous links and provides you with an insight into your behavior.
- Email Guardian is a cloud-based service which monitors emails from supported providers, scans them the minute they hit your inbox and flags them as malicious if they contain a threat. This feature processes for its functionality, products and business improvement personal data, such as e-mail and its content, including attachments. When enabled, it provides optimal protection even when your device is switched off. To connect to Gmail accounts we need to ask Google for permission to use its APIs. Google allows companies to use its APIs only if they undertake to limit its use of information accessed through the APIs. As a result, Product's use and transfer to any other product of information received from these Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements. In line with the privacy-by-design principle, we use privacy-preserving techniques (in particular Presidio) to remove personal data from emails to ensure the highest level of

- protection. These techniques, however, cannot guarantee full effectiveness and, therefore, we still treat all data as personal.
- Scam Protection warns you if you tap a dangerous link from any email, SMS, or messaging app.

Personal Data We Process

While using Avast One (Android), we collect and process the following Service and Device Data (in addition to Account Data and Billing Data for paid version):

Service data	What we use it for and for how long
Identifier of the content (message) being delivered	Service Provision (36 months)
	To monitor service functionality
	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (50 months)
	To monitor messaging performance
IP address	Service Provision (36 months)
	 To detect the approximate location of malicious software. For free Antivirus, IP address is replaced at activation with city/country. For free and paid Antivirus, it is a part of malware infection file replaced in 30 days with city/country
Samples, files	Service Provision (36 months)
	For the functionality of malware scanning and analysis

Detections	Service Provision (36 months)
	For the functionality of malware scanning
Information concerning URLs of websites visited (malicious and non-malicious) and referrers (previous page with link to malware-hosting site)	Service Provision (36 months) • For Web Shield feature's detection of malicious websites
User's email address(es) for Identity leaks scanning and monitoring	 Service Provision (36 months) To send a requested report to you on whether or not their credentials have leaked (one time or regularly depending on users preferences)
	Product and Business Improvement (36 months)To improve the user's overall experience
Timestamps of connections	Service Provision (35 days)
for VPN	 To calculate peak times of service demand in order to plan the network capacity
	To manage the number of concurrent active connections, and handle abuse
	To troubleshoot our service
Amount of data transmitted for	Service Provision (35 days)
VPN	 To plan for new network capacity and server improvements
	To calculate a free usage quota

Events and product usage	Service Provision (36 months)
	 To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	 Contextual promotional messaging
	Product and Business Improvement
	 To better understand our users' behavior and users' acquisition (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
Email Guardian - Email	Service Provision (seconds)
	 In order to check your email, we download it whole, together with metadata and attachments. We keep it in our systems only during the processing, we don't store it
	Service Provision (36 months)
address of sender	For the functionality of malware scanning
	To evaluate senders' reputation

Email Guardian - Subject of emails, MessageIDs of emails	 Service Provision (4 weeks) To ensure proper functionality and fix bugs. Stored together with the user's email address
Email Guardian - Detections	Service Provision (36 months)
 hash of the email 	For the functionality of malware scanning
 hash of the userID 	and maintenance
email subject	Product and Business Improvement (36 months)
 hash of sender email address 	Threat statistics and internal analysis
 domain address of sender 	
 detection type and name 	
 name of the attachments and their hashes 	
country of the user	

Device Data	What we use it for and for how long
Online identifiers (GUID, Device ID (Android ID), Advertising ID)	Service Provision (36 months) To ensure functionalities of the product and its features
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement

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	 To better understand our users' behavior (50 months)
	 To recognize reinstalls of the app on the same device (36 months)
Information concerning device	Service Provision (36 months)
(carrier, OS version, OS build number, Hardware ID, device model, device brand, device	 To ensure functionalities of the product and its features
manufacturer, device API	In-product Messaging (6 months)
level)	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
Location (city/country,	Service Provision (36 months)
longitude and latitude)	 Delivering geo-specific changes to app's configuration (both local or remote)
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	 Delivering geo-specific promotional messaging
	Product and Business Improvement
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	 To better understand users' behavior based on approximate location (50 months) To introduce a new feature or product based on approximate location (36 months)
Installed applications	Service Provision (36 months)To define rules how Antivirus should behave
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
Internet and connection	Service Provision (36 months)
	For security prerequisites
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (50 months)
	 To introduce a new feature or product based on previous experience (36 months)

Note that samples (files, URLs) used for malware analysis are kept in our systems as long as it is necessary to ensure proper functionality of the AV

product. These samples are not connected with any identifiers or individuals and the retention periods indicated above do not apply to this use.

These are the third-party analytics tools we use for Avast One (Android):

- Google Firebase and Crashlytics Analytics for Android
- AppsFlyer

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

Avast One for Mobile (iOS)

Official Product Name

Avast One Essential, Avast One Premium, Avast One Individual, <u>Avast One Family</u> (collectively as "Avast One (iOS)")

Core Functionality

Avast One (iOS) provides a comprehensive set of features protecting users against potential security and privacy threats, and features for optimizing device's performance.

What are Product's Features

- VPN feature protects your privacy by encrypting your online communication so no one can spy on what you're doing online. The paid version of Avast One Premium allows you to pick a specific location to be connected from.
- **Web Shield** detects and notifies you when accessing a malicious website that could represent a potential security risk for you.
- Photo Vault locks your photos in an encrypted vault and secures them with a PIN, Touch ID, or Face ID so that only you have access to them.
- Data Breach Monitoring looks for leaked personal information, whether your data has been compromised in a breach and your information is exposed on the dark web. If we identify new breaches we alert you based on the email address you submitted. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here.

- Online Safety Score analyzes data collected by Avast One such as files scanned for malware and websites scanned for dangerous links and provides you with an insight into your behavior.
- Email Guardian is a cloud-based service which monitors emails from supported providers, scans when they arrive in your inbox and flags them as malicious if they contain a threat. In order to deliver its functionality and allow us to improve our products and business, this feature processes personal data, such as e-mail and its content, including attachments. When enabled, it provides protection to your device even when the device is switched off. Connecting this feature to Gmail accounts requires us to ask Google for permission to use its APIs. Google allows companies to use its APIs only if they undertake to limit its use of information accessed through the APIs. As a result, the use and transfer of information received from these Google APIs to any other product will adhere to Google API Services User Data Policy, including the Limited Use requirements. In line with the privacy-by-design principle, we use privacy-preserving techniques (in particular Presidio) to remove personal data from emails to ensure the highest level of protection. These techniques, however, cannot guarantee full effectiveness and, therefore, we still treat all data as personal.

Personal Data We Process

While using Avast One (iOS), we collect and process the following Service and Device Data (in addition to Account Data and Billing Data for paid version):

Service data	What we use it for and for how long
Identifier of the content (message) being delivered	Service Provision (36 months) • To monitor service functionality
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (50 months)

	To monitor messaging performance
IP address	 Service Provision (36 months) To detect the approximate location of malicious software. For free Antivirus, IP address is replaced at activation with city/country. For free and paid Antivirus, it is a part of malware infection file replaced in 30 days with city/country
Information concerning URLs of websites visited (malicious and non-malicious) and referrers (previous page with link to malware-hosting site)	 Service Provision (36 months) For Web Shield feature's detection of malicious websites
User's email address(es) for Identity leaks scanning and monitoring	 Service Provision (36 months) To send a requested report to you on whether or not their credentials have leaked (one time or regularly depending on users preferences) Product and Business Improvement (36 months) To improve the user's overall experience
Timestamps of connections for VPN	Service Provision (35 days) • To calculate peak times of service demand in order to plan the network capacity

	 To manage the number of concurrent active connections, and handle abuse
	To troubleshoot our service
Amount of data transmitted for	Service Provision (35 days)
VPN	 To plan for new network capacity and server improvements
	To calculate a free usage quota
Events and product usage	Service Provision (36 months)
	 To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Contextual promotional messaging
	Product and Business Improvement
	 To better understand our users' behavior and users' acquisition (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
Email Guardian - Email	Service Provision (seconds)
	 In order to check your email, we download the whole email message, including metadata and attachments. We

	keep it in our systems only during the processing, we don't store it
Email Guardian - Hash of email address of sender	 Service Provision (36 months) To provide the functionality of malware scanning To evaluate senders' reputation
Email Guardian - Subject of emails, MessageIDs of emails	Service Provision (4 weeks) • To ensure proper functionality and fix bugs. Stored together with the user's email address
 hash of the email hash of the userID email subject hash of sender email address domain address of sender detection type and name name of the attachments and their hashes country of the user 	 To provide the functionality of malware scanning and to do maintenance Product and Business Improvement (36 months) To do threat statistics and internal analysis

Device Data	What we use it for and for how long	ı

Online identifiers (GUID,
Device ID (Apple Bundle ID),
Advertising ID)

Service Provision (36 months)

 To ensure functionalities of the product and its features

In-product Messaging (24 months)

 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement

- To better understand our users' behavior (50 months)
- To recognize reinstalls of the app on the same device (36 months)

Information concerning device (carrier, OS version, OS build number, Hardware ID, device model, device brand, device manufacturer, device API level)

Service Provision (36 months)

 To ensure functionalities of the product and its features

In-product Messaging (6 months)

 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem

Product and Business Improvement

- To better understand users' behavior (50 months)
- To improve the user's overall experience by developing new features and products (36 months)

Location (city/country,	Service Provision (36 months)			
longitude and latitude)	Delivering geo-specific changes to app's configuration (both local or remote)			
	In-product Messaging (6 months)			
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 			
	 Delivering geo-specific promotional messaging 			
	Product and Business Improvement			
	 To better understand users' behavior based on approximate location (50 months) 			
	 To introduce a new feature or product based on approximate location (36 months) 			
Installed applications	Service Provision (36 months)			
	 To define rules how Antivirus should behave 			
	In-product Messaging (6 months)			
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 			
Internet and connection	Service Provision (36 months)			
	For security prerequisites			
	In-product Messaging (6 months)			
	 To inform users of problems that will not be solved by the currently installed 			

product and to offer users a solution to the detected problem

Product and Business Improvement

- To better understand users' behavior (50 months)
- To introduce a new feature or product based on previous experience (36 months)

These are the third-party analytics tools we use for Avast One (iOS):

- Google Firebase and Crashlytics Analytics for iOS
- AppsFlyer

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

Avast One for Desktop (Windows)

Official Product Name

<u>Avast One Essential</u>, <u>Avast One for Windows</u> (collectively as "Avast One (Windows)")

Core Functionality

Avast One (Windows) provides a comprehensive set of features protecting users against potential security and privacy threats, and features for optimizing device's performance.

What are Product's Features

Security

- CommunityIQ is a threat monitoring service for Windows and Mac which sends information about a threat detected in your device to our server, so we can observe how the threat spreads and block it. This is vital for the functioning of our Antivirus and our ability to keep your device secure.
- CyberCapture detects and analyses rare, suspicious files on your Windows. If you attempt to run such a file, CyberCapture locks the file from your PC and sends it to our Threat Lab where it is analysed

- in a safe, virtual environment. All files are uploaded over an encrypted connection, which means your data is inaccessible to hackers.
- File Reputation provides a real-time comparison with an up-todate list of malware databases of executable files sourced from users of Windows who agree to participate in the service. FileRep processes files or their hashed versions to evaluate which are infectious and updating virus databases.
- Web Shield scans data that is transferred when you browse the internet in real-time to prevent malware from being downloaded and run on your computer. By default, Web Shield is on and configured to provide optimal protection when switched on.
- File Shield scans programs and files saved on devices for malicious threats in real-time before allowing them to be opened, run, modified, or saved
- o **Email Guardian** (on the web) is a cloud-based service which monitors emails from supported providers, scans when they arrive in your inbox and flags them as malicious if they contain a threat. In order to deliver its functionality and allow us to improve our products and business, this feature processes personal data, such as e-mail and its content, including attachments. When enabled, it provides protection to your device even when the device is switched off. Connecting this feature to Gmail accounts requires us to ask Google for permission to use its APIs. Google allows companies to use its APIs only if they undertake to limit its use of information accessed through the APIs. As a result, the use and transfer of information received from these Google APIs to any other product will adhere to Google API Services User Data Policy, including the Limited Use requirements. In line with the privacy-bydesign principle, we use privacy-preserving techniques (in particular Presidio) to remove personal data from emails to ensure the highest level of protection. These techniques, however, cannot guarantee full effectiveness and, therefore, we still treat all data as personal.
- Email Guardian (on your device) scans for threats in your incoming and outgoing email messages and attachments. Scanning applies only to messages sent or received using mail management software, such as Microsoft Outlook, Apple Mail or Mozilla Thunderbird.

- **VPN** feature protects your privacy by encrypting your online communication, so no one can spy on what you're doing online. It allows you to pick a specific location to be connected from.
 - VPN reminders remind users to connect to the VPN based on the type of the visited URL with an option to turn it off.
- Personal Identity Scan and Monitoring looks for leaked personal information, whether your data has been compromised in a breach and your information is exposed on the dark web. If we identify new breaches we alert you based on the email address you submitted. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here. The feature also has the capability, if you consent, to scan your browser for weak, reused or breached passwords and provides instructions to fix these passwords.

Performance

- Disk Cleaner detects and removes junk files from your PC.
- App Optimizer detects apps that slow you down and allows the user to temporarily disable it when not in use.
- Software Updater detects a list of outdated software applications and gets them up-to-date.
- o **Driver Updater** detects outdated drivers and gets them up-to-date.
- Online Safety Score analyzes data collected by Avast One such as files scanned for malware and websites scanned for dangerous links and provides you with an insight into your behavior.
- Platinum version also includes credit monitoring, transaction monitoring, social media monitoring, alerts to help you determine if your identity has been compromised and specialist support. These features are provided in cooperation with Sontiq, Inc. We share your name, surname, license ID and email with Sontiq so that they can prepare the service for you. The data processing within the product is governed by this <u>Privacy Notice</u>.

Personal Data We Process

While using Avast One (Windows), we collect and process the following Service and Device Data (in addition to Account Data and Billing Data for paid version):

Service data	What we use it for and for how long

Identifier of the content	Compies Brazisian (20 months)
Identifier of the content (message) being delivered	Service Provision (36 months)
(message) being delivered	To monitor service functionality
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (50 months)
	To monitor messaging performance
IP address	Service Provision (36 months)
	 To detect the approximate location of malicious software. For free Antivirus, IP address is replaced at activation with city/country. For free and paid Antivirus, it is a part of malware infection file replaced in 30 days with city/country
Samples, files	Service Provision (36 months)
	 For the functionality of malware scanning and analysis
Detections	Service Provision (36 months)
	For the functionality of malware scanning
Information concerning URLs of websites visited (malicious and non-malicious) and referrers (previous page with link to malware-hosting site)	 Service Provision (36 months) For Web Shield feature's detection of malicious websites In-product Messaging (with option to optout)

	To recommend user to turn on the VPN for better protection
User's email address(es) for Identity leaks scanning and monitoring	 Service Provision (36 months) To send a requested report to you on whether or not their credentials have leaked (one time or regularly depending on users preferences) Product and Business Improvement (36 months) To improve the user's overall experience
Timestamps of connections for VPN	 Service Provision (35 days) To calculate peak times of service demand in order to plan the network capacity To manage the number of concurrent active connections, and handle abuse To troubleshoot our service
Amount of data transmitted for VPN	 Service Provision (35 days) To plan for new network capacity and server improvements To calculate a free usage quota
Events and product usage	 Service Provision (36 months) ■ To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product In-product Messaging (24 months)

	To inform users of problems that will not be solved by the currently installed
	product and to offer users a solution to the detected problem
	 Contextual promotional messaging
	Product and Business Improvement
	 To better understand our users' behavior and users' acquisition (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
Email Guardian - Email	Service Provision (seconds)
	 In order to check your email, we download the whole email message, including metadata and attachments. We keep it in our systems only during the processing, we don't store it
	Service Provision (36 months)
address of sender	 To provide the functionality of malware scanning
	To evaluate senders' reputation
Email Guardian - Subject of	Service Provision (4 weeks)
emails, MessageIDs of emails	 To ensure proper functionality and fix bugs. Stored together with the user's email address
Email Guardian - Detections	Service Provision (36 months)
 hash of the email 	To provide the functionality of malware
 hash of the userID 	scanning and to do maintenance

•	email subject			and	Busin	ess Impr	ovem	ent (36
•	hash of sender email address	mont •	,	do	threat	statistics	and	internal
•	domain address of sender		ana	alysis				
•	detection type and name							
•	name of the attachments							

and their hashes

country of the user

Device Data	What we use it for and for how long		
Online identifiers (GUID,	Service Provision (36 months)		
Device ID (Android ID), Advertising ID)	 To ensure functionalities of the product and its features 		
	In-product Messaging (24 months)		
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 		
	Product and Business Improvement		
	 To better understand our users' behavior (50 months) 		
	 To recognize reinstalls of the app on the same device (36 months) 		
Information concerning device	Service Provision (36 months)		
(carrier, OS version, OS build number, Hardware ID, device model, device brand, device	 To ensure functionalities of the product and its features 		
	In-product Messaging (6 months)		

manufacturer, device API level)	To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem				
	Product and Business Improvement				
	 To better understand users' behavior (50 months) 				
	 To improve the user's overall experience by developing new features and products (36 months) 				
Location (city/country,	Service Provision (36 months)				
longitude and latitude)	 Delivering geo-specific changes to app's configuration (both local or remote) 				
	In-product Messaging (6 months)				
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem 				
	 Delivering geo-specific promotional messaging 				
	Product and Business Improvement				
	 To better understand users' behavior based on approximate location (50 months) 				
	 To introduce a new feature or product based on approximate location (36 months) 				
Installed applications	Service Provision (36 months)				
	 To define rules how Antivirus should behave 				

	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
Internet and connection	Service Provision (36 months)
	For security prerequisites
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (50 months)
	 To introduce a new feature or product based on previous experience (36 months)
Email Guardian (on the	Service Provision (1 month)
 device) - Detections email subject sender email address email content or attachment detection type and name 	 For protection, detection, blocking, quarantining and deleting of malicious software

Note that samples (files, URLs) used for malware analysis are kept in our systems as long as it is necessary to ensure proper functionality of the AV product. These samples are not connected with any identifiers or individuals and the retention periods indicated above do not apply to this use.

Avast One for Desktop (Mac)

Official Product Name

Avast One Essential, Avast One for Mac (collectively as "Avast One (Mac)")

Core Functionality

Avast One (Mac) provides a comprehensive set of features protecting users against potential security and privacy threats, and features for optimizing device's performance.

What are Product's Features

Security

- CommunityIQ is a threat monitoring service for Windows and Mac which sends information about a threat detected in your device to our server, so we can observe how the threat spreads and block it. This is vital for the functioning of our Antivirus and our ability to keep your device secure.
- CyberCapture detects and analyses rare, suspicious files on your Mac. If you attempt to run such a file, CyberCapture locks the file from your Mac and sends it to our Threat Lab where it is analysed in a safe, virtual environment. All files are uploaded over an encrypted connection, which means your data is inaccessible to hackers.
- File Shield looks for malware on your device and secures it before it can harm you
- Ransomware Shield secures your most important folders and your files within.
- Quarantine locks away suspicious and dangerous files found during scans
- Web Hijack Guard ensures that the websites you visit are legitimate and safe.
- Web Shield scans data that is transferred when you browse the internet in real-time to prevent malware from being downloaded and run on your computer. By default, Web Shield is on and configured to provide optimal protection when switched on.
- Email Guardian (across all devices) is a cloud-based service which monitors emails from supported providers, scans them the minute they hit your inbox and flags them as malicious if they contain a threat. This feature processes for its functionality, products and business improvement personal data, such as e-mail

and its content, including attachments. When enabled, it provides optimal protection even when your device is switched off. To connect to Gmail accounts we need to ask Google for permission to use its APIs. Google allows companies to use its APIs only if they undertakecomply with their rules to limit its use of information accessed through the APIs. As a result, **the p**roduct's use and transfer to any other product of information received from these Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements. In line with the privacy-bydesign principle, we use privacy-preserving techniques (in particular Presidio) to remove personal data from emails to ensure the highest level of protection (this applies to Email Shield, too). These techniques, however, cannot guarantee full effectiveness and, therefore, we still treat all data as personal.

- Email Guardian (only on particular Mac device) scans for threats in your incoming and outgoing email messages and attachments. Scanning applies only to messages sent or received using mail management software, such as Microsoft Outlook, Apple Mail or Mozilla Thunderbird.
- **VPN** feature protects your privacy by encrypting your online communication so no one can spy on what you're doing online. It allows you to pick a specific location to be connected from.
 - VPN reminders remind users to connect to the VPN based on the network you are connected to with an option to turn it off.
- Data Breach Monitoring looks for leaked personal information, whether your data has been compromised in a breach and your information is exposed on the dark web. If we identify new breaches we alert you based on the email address you submitted. This is done in cooperation with our partner SpyCloud which checks your credentials against its repository of stolen accounts. For further information please refer to its privacy policy here. The feature also has the capability, if you consent, to scan your browser for weak, reused or breached passwords and provides instructions to fix these passwords.
- Clear Browsing Data deletes browsing items that can be used by third parties to create a long term record of your browsing history.
- Performance
 - Disk Cleaner detects and removes junk files from your Mac.
 - App Uninstaller shows apps that you have not used in a long time and helps you to completely unistall them.
 - Photo Cleaner Scans your photos to find duplicate and low quality pictures and helps you to remove them.

• Online Safety Score analyzes data collected by Avast One such as files scanned for malware and websites scanned for dangerous links and provides you with an insight into your behavior.

Personal Data We Process

While using Avast One (Mac), we collect and process the following Service and Device Data (in addition to Account Data and Billing Data for paid version):

Service data	What we use it for and for how long
Identifier of the content	Service Provision (36 months)
(message) being delivered	To monitor service functionality
	In-product Messaging (6 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement (50 months)
	To monitor messaging performance
IP address	Service Provision (36 months)
	 To detect the approximate location of malicious software. For free Antivirus, IP address is replaced at activation with city/country. For free and paid Antivirus, it is a part of malware infection file replaced in 30 days with city/country
Samples, files	Service Provision (36 months)
	For the functionality of malware scanning and analysis

Detections	Service Provision (36 months)		
	For the functionality of malware scanning		
Information concerning URLs of websites visited (malicious and non-malicious) and referrers (previous page with link to malware-hosting site)	 Service Provision (36 months) For Web Shield feature's detection of malicious websites In-product Messaging (with option to optout) To recommend user to turn on the VPN for better protection 		
User's email address(es) for Identity leaks scanning and monitoring	 Service Provision (36 months) To send a requested report to you on whether or not their credentials have leaked (one time or regularly depending on users preferences) Product and Business Improvement (36 months) To improve the user's overall experience 		
Timestamps of connections for VPN	 Service Provision (35 days) To calculate peak times of service demand in order to plan the network capacity To manage the number of concurrent active connections, and handle abuse To troubleshoot our service 		
Amount of data transmitted for VPN	 Service Provision (35 days) To plan for new network capacity and server improvements 		

	To calculate a free usage quota
Events and product usage	Service Provision (36 months)
Lvollo and product dodgo	To ensure continuous functionality (installations, versions, updates, settings) and map how users interact with our product
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Contextual promotional messaging
	Product and Business Improvement
	 To better understand our users' behavior and users' acquisition (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
Email Guardian (across all devices) - Email	Service Provision (seconds) • In order to check your email, we download it whole, together with metadata and attachments. We keep it in
	our systems only during the processing, we don't store it

Email Guardian (across all devices) - Hash of email address of sender	 Service Provision (36 months) For the functionality of malware scanning To evaluate senders' reputation
Email Guardian (across all devices) - Subject of emails, MessageIDs of emails	, ,
 Email Guardian (across all devices) - Detections hash of the email hash of the userID email subject hash of sender email address domain address of sender detection type and name name of the attachments and their hashes country of the user 	 For the functionality of malware scanning and maintenance Product and Business Improvement (36 months) Threat statistics and internal analysis

Device Data	What we use it for and for how long
Online identifiers (GUID, Device ID (Android ID), Advertising ID)	 Service Provision (36 months) To ensure functionalities of the product and its features In-product Messaging (24 months)

	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem Product and Business Improvement To better understand our users' behavior
	 (50 months) To recognize reinstalls of the app on the same device (36 months)
Information concerning device	Service Provision (36 months)
(carrier, OS version, OS build number, Hardware ID, device model, device brand, device	 To ensure functionalities of the product and its features
manufacturer, device API	In-product Messaging (6 months)
level)	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand users' behavior (50 months)
	 To improve the user's overall experience by developing new features and products (36 months)
Location (city/country,	Service Provision (36 months)
longitude and latitude)	 Delivering geo-specific changes to app's configuration (both local or remote)
	In-product Messaging (6 months)
	To inform users of problems that will not be solved by the currently installed

product and to offer users a solution to the detected problem
 Delivering geo-specific promotional messaging
Product and Business Improvement
 To better understand users' behavior based on approximate location (50 months)
 To introduce a new feature or product based on approximate location (36 months)
Service Provision (36 months)
 To define rules how Antivirus should behave
In-product Messaging (6 months)
 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
Service Provision (36 months)
For security prerequisites
In-product Messaging (6 months)
 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
Product and Business Improvement
 To better understand users' behavior (50 months)

	 To introduce a new feature or product based on previous experience (36 months)
Email Guardian (only on particular Mac device) - Detections • email subject	Service Provision (1 month) • For protection, detection, blocking, quarantining and deleting of malicious software
 sender email address 	
email content or attachment	
detection type and name	

Note that samples (files, URLs) used for malware analysis are kept in our systems as long as it is necessary to ensure proper functionality of the AV product. These samples are not connected with any identifiers or individuals and the retention periods indicated above do not apply to this use.

Online Security & Privacy

Official Product Name

Online Security & Privacy

Core Functionality

Online Security & Privacy is a browser extension (or plug-in) available for Chrome, Firefox, Edge, Safari, and also Avast Secure Browser. Whenever you visit a website we check if the site isn't malicious or phishing. We are able to provide you with this functionality by processing URLs.

What are Product's Features

- **Antivirus** checks the links in search results so the user knows if the page is trying to spread malware.
- Anti-phishing identifies and blocks phishing sites trying to steal your data.
- Anti-tracking blocks annoying tracking cookies that collect data on your browsing activities.
- Marking Search Results shows if the site is safe or not even before the user visits it.
- Advertising Data Collection opts out from ads based on user personal interests. By opting out of interest-based advertising it means the company or companies from which you opt out will no longer show ads that have been tailored to your interests.
- **Privacy Advisor** allows optimizing privacy settings on the most popular online platforms via step-by-step guidance.
- Global Privacy Control is a <u>third-party solution</u> we have implemented in the settings, the user can send web companies he visits a "GPC" signal that he wants to opt out of website selling or sharing his personal information. See the specifics here.
- Cookie Manager automatically accepts or declines cookie consent preference banners while users browse the web.

Personal Data We Process

While using Online Security & Privacy, we process the following Service and Device Data (in addition to Account Data and Billing Data for paid features):

Service Data	What we use it for and for how long
URL	Service Provision (24 months)
	 To check if URLs and the preceding referral domains or URLs (as applicable) are malicious or not to identify its source for threat analysis
	To ensure the functionality of cookie consent manager (allowed websites, troubleshooting)
Usage data	Service Provision (24 months)
(open extension, rated site, disabled trackers,	

change blocked)	settings,	site	 To ensure functionality (installations, versions, updates, settings), map how users interact with the app and improve its design or flows
			Product and Business Improvement (24 months)
			 To measure user's behavior in UI and how user interacts with the extension

Device Data	What we use it for and for how long
Internal extension identifier (GUID)	 Service Provision (24 months) To distinguish unique malware hits and evaluate it in our systems Product and Business Improvement (24 months) To measure product telemetry and calculate statistics
Information on computer or device (hardware ID, browser, OS)	 Product and Business Improvement (24 months) To obtain usage statistics
Extension information (installation source and time, version and campaign ID)	Product and Business Improvement (24 months) To obtain usage statistics, evaluate our messages and perform feature A/B testing
Location / Country	Service Provision (24 months) • To detect country specific malware campaigns
	 Product and Business Improvement (24 months) To measure product telemetry and calculate statistics
Language	Service Provision (24 months)

	 To make sure we communicate in right language
	Product and Business Improvement (24 months)
	 To measure product telemetry and calculate statistics
Antivirus Status	Service Provision (24 months)
	 To being able to turn on Bank Mode which works only when Avast Antivirus is installed and offers to user to open page in a safe sandbox environment on sensitive sites (banking)

Passwords Official Product Name

<u>Avast Passwords</u>, <u>Avast Passwords for Mac</u>, <u>Avast Passwords for iOS</u> and <u>Avast Passwords for Android</u> (collectively as "Passwords")

Core Functionality

Passwords captures, stores in an encrypted storage and automatically fills passwords, credit cards and notes entered by you.

The product consists of several components that differ by platform:

- Windows Avast Passwords browser extensions for Google Chrome, Mozilla Firefox, Avast Secure Browser and Microsoft Edge are paired with Avast Antivirus
- Mac Avast Passwords browser extensions for Google Chrome, Mozilla Firefox and Safari are paired with standalone Avast Passwords for Mac application

 Mobile - standalone Avast Passwords for iOS and Avast Passwords for Android applications

What are Product's Features

- Password Guardian immediately receives a notification if any of your stored passwords are found leaked online to keep your identity safe. The functionality also reports weak and duplicate passwords.
- Logins and Credit Cards stores your usernames and passwords in an encrypted vault and secure them with a master password or operating system login credentials so that only you have access to them.
- **Secure Notes** provides the same encryption as Logins and Credit Cards to any notes added in the application.

Personal Data We Process

Passwords and its components store encrypted information, so that only you as the user who stored this information has access to it. Avast cannot decrypt and read the data.

Unencrypted Service and Device Data are detailed as follows (in addition to Billing Data or Account Data, if relevant):

Service data	What we use it for and for how long
Events and product usage (app metadata, number of hack alerts checks, number and result of Wi-Fi scans, error logs and screen flow)	 Service Provision (24 months) To encrypt data synchronization Product and Business Improvement (39 months) For development of new features or
Information about user interaction with web pages	products Service Provision (60 days raw data) To improve quality of login and password change forms recognition
	onango romo rocognidon

Device Data	What we use it for and for how long
Random extension identifier	 Service Provision (24 months) For users' support and troubleshooting Product and Business Improvement (39 months) For development of new features or products
Operating System Version,	Service Provision (24 months)
Avast Antivirus / Avast Passwords application Version, Browser Version, Extension Version	 For users' support and troubleshooting Product and Business Improvement (39 months) For development of new features or products
Config name / Config AB test	Service Provision (24 months) To propagate various configurations based on different configuration sets entry values

SafePrice

Official Product Name

Avast SafePrice

Core Functionality

SafePrice is a browser extension available for Chrome, Firefox, Edge and Safari. Whenever you visit an online shop or product site, SafePrice will show relevant price comparison and discount coupons.

- Discount coupons and other promotional offers are typically provided by store owners to incentivize purchases. This means that these coupons are relevant to specific domains, and sometimes specific pages only. In order to be able to offer relevant coupons, we need to check the current page URL against a list of available offers.
- Price Comparison looks for specific portions of the HTML code which allows it to identify basic information about the product you are shopping for – product name, SKU and current price. We then compare this information with a database of prices provided by our partners, and offer cheaper prices for the same product where available.

Information about available offers, coupons or cheaper prices is obtained from Ciuvo. We request this content based on the information obtained from the page, your language settings, country level location and search query within SafePrice. Once you click on the offer, your request will be processed by Ciuvo according to its privacy policy.

Personal Data We Process

While using SafePrice, we process the following Service and Device Data:

Service Data	What we use it for and for how long	
URL and referrers	Service Provision (36 months)	
	 To display discount coupons and price comparison offers relevant to the website that you are visiting 	
Search query	Service Provision (36 months)	
	 If submitted you, to search for relevant products and discount coupons 	
Product name and price	Service Provision (36 months)	
	 To display price comparison offers relevant to the product that you are shopping for 	

	Service Provision (36 months)
(ratings, comments)	 To tell whether the offers you received are relevant and up-to-date, and collect product feedback
	Product and Business Improvement (36 months)
	 To develop new products based on the user's feedback

Device Data	What we use it for and for how long
Internal extension identifier (GUID)	 Service Provision (36 months) For ensuring continuous functionality and breaking down entries in database Product and Business Improvement (36 months) To measure product telemetry and calculate statistics
Information on computer or device (browser)	Product and Business Improvement (36 months)To obtain usage statistics
Extension information (installation source and time, version and campaign ID)	 To make sure our offers are relevant and
Country	 Service Provision (36 months) To make sure our offers are relevant, and collect statistics on SafePrice usage by country

Language	Service Provision (36 months)	
	 To make sure our offers are relevant, and collect statistics on SafePrice usage by language 	

SafePrice does not process Account or Billing Data.

Secure Browser

Secure Browser for Desktop

Official Product Name

<u>Avast Secure Browser</u> ("Secure Browser for Desktop")

Core Functionality

Secure Browser for Desktop is a product currently offered for PC Windows and for macOS users.

- Browser Security & Privacy Center is built in Security & Privacy Center which is a curated collection of some key security and privacy features, tools and settings, organized into one management console making it easier for you to control and manage your online privacy and security.
- WebShield protects you from accessing dangerous websites, such as fake sites, sites that have harmful programs such as adware, spyware, ransomware, viruses, all types of other malware that aim at stealing your information. It includes https scanning that decrypts and scans encrypted traffic of selected websites to detect potential malware contained on sites using https connections. All scanning occurs locally on your PC during the HTTPS connection, and no one outside of your device can read or decipher the connection.
- Privacy Cleaner cleans all your browser history, all cookies including 3rd party, cached images, and other tracking scripts with just one click, to ensure that your online activity is private as well as free up space on your device.

- Privacy Guard is a built-in extension that helps make your online experience cleaner, faster, safer, and more private. It comprises Adblocker (stops ads from loading), Anti-tracker (blocks tracking scripts and cookies), and Anti-Fingerprint (disguises your browser fingerprint to help prevent websites from tracking you) features all in one. Privacy Guard collects and displays the number of blocked 3rd party calls from external sources.
- Sync means you can sign into the browser using your Avast ID or Google account. Your browsing data (including bookmarks, history, settings, open tabs, passwords, address, phone numbers, and payment information) will be then backed up and available across all your devices. If you sign into the browser using your Avast ID, we receive information that you sync across devices in encrypted form, and we are not able to access it or read it.
- Built-in VPN (virtual private network) that creates an encrypted connection between your device and the internet, securing your browsing data against eavesdroppers, trackers, and hackers. This VPN feature does not track or store connection timestamps, session information, bandwidth usage, traffic data, IP addresses, or other similar data. Using a VPN helps keep you more private and secure but you are still accountable for everything you do online.
- Avast Addons Store is an online store created and maintained by Avast that allows you to view and install a wide range of extensions. On installation of each extension, you will be asked what data you can share with the extension. Extensions are addons that are built to extend the functionality of the browser itself or integrate an existing service with the browser.
- Extension Guard is a built-in extension that helps protect against spammy, fake, or malware browser extensions.
- Webcam Guard helps protect against unauthorized access to your device camera.
- Video Downloader is an extension that allows you to convert and download videos from YouTube and other social media platforms.
- HackCheck see the HackCheck section.
- Accuweather widget used to display weather information on the new tab page based on the approximate location (derived from the IP address) and device model/OS.

Personal Data We Process

By default, Secure Browser for Desktop processes locally on your system the following data:

- Browsing history information; for example Secure Browser for Desktop may store the URLs of pages that you visit, a cache of text, images and other resources from those pages. If the pre-rendering feature is turned on, a list of IP addresses linked to those pages may also be stored for some period of time;
- Name, surname, email or passwords to help you fill out forms or signs in to sites you visit;
- Permission that you have granted to websites;
- Cookies or data from websites that you visit;
- Data saved by add-ons;
- Record of what you downloaded from websites;
- IP addresses are not stored, only used for product localization and analytics purposes based on approximate location (city/country level);

This data is not sent to our environment. You can manage this data within Secure Browser for Desktop in the Settings page.

However, if you enable the Sync feature, we will process relevant browsing data in our environment to ensure the sync across your devices.

In our environment we process the following Service and Device Data (in addition to Account Data and Billing Data, if relevant) while using Secure Browser for Desktop:

Service Data	What we use it for and for how long
	•
Subset of URLs and referrers	Service Provision (36 months)
	 For the WebShield feature, a
	subset of URLs is processed in
	our backends for protection,
	detection, blocking,
	quarantining and deleting of
	malicious software or attacks.
	Service Provision (36 months)
Events and product usage	 To ensure functionality
_	(installations, versions,

	updates, settings), map how users interact with the application and improve its design or flows In-product Messaging (24 months) • To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business
	 To better understand our users' behavior (up to 60 months) Findings about product have an effect on the design or layout of the new one (36 months)
	Product and Business
User's feedback ratings	 Improvement (36 months) To improve the product or its feature based on the user's feedback
User's feedback comments	 Service Provision (36 months) To ensure functionality and prevent crashes based on the user's feedback Product and Business Improvement (36 months) To improve the product or its
	feature based on the user's feedback
Sync data (bookmarks, history, settings, open tabs, passwords, adder ss, phone numbers, and	Service Provision (3 months) • If you enable the Sync feature to ensure the sync of browser data across devices. If you

payment information (name on card,	disable the Sync feature, data
card number, expiration date))	is deleted within 3 months.
Secure Browser VPN events (such as "upgrade now" clicks, "free trial" clicks (called "application event identifier"))	Service Provision (36 months) If you enable the VPN feature to ensure the functionality (installations, versions, updates, settings), map how users interact with the application and improve its design or flows Product and Business Improvement (36 months) If you enable the VPN feature, for product improvements, and development planning as we aim at developing best-in-class products

e Provision (36 m For ensuring functionality and br	continuous
entries in database duct Messaging (To inform users that will not be so currently installed to offer users a so detected problem ct and vement	(24 months) of problems olved by the product and olution to the Business
	Fo inform users hat will not be sourrently installed o offer users a solution of the content of

	 To introduce a new feature or product based on previous experience (36 months)
Information concerning computer or device	Service Provision (36 months)
	 Product and Business Improvement To better understand users' behavior (60 months) To introduce a new feature or product based on previous experience (36 months)
Location (on a city/country level)	Service Provision (36 months) • Setting up a proper product language version for Windows In-product Messaging (6 months) • To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem Product and Business Improvement • To better understand users' behavior (50 months)

	To introduce a new feature or product based on country (36 months)
Extensions installed in the browser	To define rules of how the Browser should behave in relation to extensions installed (e.g. exceptions in scanning, filtering, notifications, whitelisting, blacklisting) In-product Messaging (6 months)
Our other products/licenses on the device and their status (e.g. our antivirus product)	Service Provision (36 months) • To recognize what features should be enabled or disabled, what product should be installed or uninstalled Product and Business Improvement (60 months) • To better understand users' behavior
Browsers (installed, default)	Service Provision (36 months) • To provide import functionality, improve user onboarding and product experience

Product	and	Business
Improver	ment	
 To 	better unde	erstand users'
beh	avior (60 moi	nths)
 To 	introduce a r	new feature or
pro	duct based	on previous
exp	erience (36 n	nonths)

The third-party analytics tools we use for Secure Browser for Desktop are:

- Google Analytics
- Mixpanel

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

Secure Browser for Desktop cooperates with these search engines:

- Google
- Yahoo
- Bing
- Seznam.cz
- Yandex.ru

For further information regarding these search engines please refer to their privacy policies under the links above.

Secure Browser for Desktop serves advertisements in cooperation with:

- Sovrn
- AdMarketplace
- Mocha
- Amazon
- Priceline
- AliExpress

For further information regarding these partners please refer to their privacy policies under the links above.

Secure Browser for Mobile

Official Product Name

<u>Avast Secure Browser for Android</u> and <u>Avast Secure Browser for iOS</u> (collectively as "Secure Browser for Mobile")

Core Functionality

Secure Browser for Mobile is a private mobile browser offered for Android and iOS users.

- Browser Security & Privacy Center is built in Security & Privacy Center which is a curated collection of some key security and privacy features, tools and settings, organized into one management console making it easier for you to control and manage your online privacy and security.
- **Adblock** stops ads being shown in your browser using publicly available blocking lists. AdBlock usually does not remove ads, it already prevents them from being loaded and thus also speeds up browser experience.
- Anti-Tracking prevents the user from being tracked across websites by avoiding tracking cookies to be created. This is done using publicly available blocking lists. Anti-Tracking usually does not remove the tracking cookies, instead it prevents them from being loaded and created and thus also speeds up browser experience.
- Anti-Fingerprinting prevents the user from being tracked across websites using browser fingerprinting techniques. As fingerprinting itself cannot be prevented or avoided, this feature prevents being tracked by altering the digital fingerprint of the user's browser in a way that thirdparty sites cannot re-identify it.
- Web Shield protects you from accessing dangerous websites, such as fake sites, sites that have harmful content such as adware, spyware, ransomware, viruses, all types of other malware that aim at stealing your information.
- **Built-in VPN** (virtual private network) creates an encrypted tunnel between your device and the internet, securing your browsing data against eavesdroppers.
- Security Scanner feature will scan the device, its internet connection and browser configuration (otherwise known as Browser Shields) for threats

- and vulnerabilities, process the findings, and display a result screen with potential improvements.
- Nuke cleans your browser history, cached images, cookies including both first-party and third-party cookies, and other junk with just one click for a specified domain, to keep your activity on that domain private and free up disk space.
- Remove Site Data cleans your browser history, site cookies, and offline data with the current site with just one click, to keep your activity private and free up disk space.
- Video Downloader enables you to download videos from supported websites to your device.
- **Media Vault** allocates your files, including those you download during your browsing sessions, to the browser application's encrypted file system. These files are stored on your device and are accessible through the browser application.
- Secure Mode encrypts your DNS queries, stops ads being shown in your browser, prevents your browsing history from being stored, and removes any tracking cookies (both first-party cookies and third-party cookies) or web cache you pick up during that browsing session.
- Secure & Private Mode creates an encrypted tunnel between your device and the internet, encrypts your DNS queries, stops ads being shown in your browser, prevents your browsing history from being stored, and removes any tracking cookies (both first-party cookies and third-party cookies) or web cache you pick up during that browsing session.
- **PIN Protection** secures your device against real world threats from local attacks by locking access to the browser application on your device with a unique code only you know. Your PIN Code is encrypted on disk and is not stored on any servers.
- **Sync** means you can sign into the browser using your Avast ID. Your browsing data (including bookmarks, history, settings, open tabs, passwords, address, phone numbers, and payment information) will be then backed up and available across all your devices. All backed-up data is encrypted with an industry standard cryptographic scheme, and can only be decrypted by the user.
- Privacy Statistics are showing the users' the advantage of our AdBlock and VPN through numbers, by presenting the number of ads blocked, number of malware blocked by our Web Shield, amount of browsing data protected by our VPN.

By default, Secure Browser for Mobile processes locally on your system the following data:

- Browsing history information; for example Secure Browser for Mobile may store the URLs of pages that you visit, a cache of text, bookmarks, zones, images and other resources from those pages.
- Permission that you have granted to websites;
- Cookies or similar technologies such as pixel tags and web beacons from websites that you visit;
- Records of what you downloaded from websites when using Media Vault.

This data is not sent to our environment. You can manage this data within Secure Browser for Mobile under the "Browsing Mode Settings" and "Data Settings" section of the Security & Privacy Settings page.

If you enable the Sync feature, we will process Sync data in our environment to ensure the sync across your devices.

In our environment we process the following Service and Device Data while using Secure Browser for Mobile (in addition to Account Data and Billing Data, if relevant):

Service Data	What we use it for and for how long
IP address	Service Provision (per session)
	 Replaced with country for delivering geo-specific changes to configuration (both local or remote)
	 For prerendering feature functionality, if activated

Events and product usage	Service Provision (36 months)
	 To ensure functionality (installations, versions, updates, settings), map how users interact with the application and improve its design or flows
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	 To better understand our users' behavior (up to 24 months)
	 Findings about product have an effect on the design or layout of the new one (24 months)
Sync data (bookmarks, history,)	Service Provision (3 months)
	 If you enable the Sync feature to ensure the sync of browser data across devices

Device Data	What we use it for and for how long

Online identifiers (GUIDs, Device	Service Provision (24 months)
IDs)	 To ensure functionality (installations, versions, updates, settings) and to track users subscription trials and purchases
	In-product Messaging (24 months)
	 To inform users of problems that will not be solved by the currently installed product and to offer users a solution to the detected problem
	Product and Business Improvement
	To better understand our users' behavior (24 months)
	 To introduce a new feature or product based on previous experience (24 months)
Information concerning computer	Service Provision (36 months)
or device	To check for compatibility issues in automated crash dumps
	Product and Business Improvement
	 To better understand users' behavior (24 months)
	 To introduce a new feature or product based on previous experience (48 months)

These are the third-party analytics tools we use for Secure Browser for Mobile:

- Google Firebase Analytics and Crashlytics for Android
- Appsflyer

For further information regarding our third-party analytics partners, including their privacy policies, please refer to our <u>Privacy Policy</u>.

Secure Browser for Mobile cooperates with these search engines:

Google

Secure Browser for Mobile serves advertisements in cooperation with:

- Sovrn
- AdMarketplace
- Mocha
- Amazon
- Priceline
- AliExpress

For further information regarding these partners please refer to their privacy policies under the links above.

Secure Identity

Official Product Name

Avast Secure Identity

Core Functionality

Secure Identity helps keep yourself safe with the advanced identity protection - including credit monitoring, alerts to help you determine if your identity has been compromised and specialist support.

Personal Data We Process

The product is provided in cooperation with Sontiq, Inc. We share your name, surname, license ID and email with Sontiq so that they can prepare the service for you. The data processing within the product is governed by this PrivacyNotice.

SecureLine

Avast SecureLine VPN (collectively as "VPN")

We are a leading provider of security and privacy tools and therefore we are deeply committed to protecting and respecting your privacy. Our <u>VPN Policy</u> (together with any other documents referred to in it) sets out the basis on which any data we collect from you, or that you provide to us, will be processed by us.

WebTrails

Official Product Name

WebTrails

Core Functionality

WebTrails is a browser extension (or plug-in) available for Chrome. It provides an alternative view of browsing history with detailed analysis and visualisations of privacy leaks and behaviour patterns. All reports are generated locally in the browser and no data is sent out to any remote servers.

All analyses are performed on-demand, on the device and with the data stored in your browser. No history data for these analyses is stored.

- **PII leak detection** looks for any personal data (e.g., plaintext names, emails) in URLs visited, based on the Chrome browsing history.
- **Habits** generates browsing behaviour habits charts, based on URLs.
- Social, Search, Video and Locations provides detailed usage reports.
 Location information is derived from the URLs.

Personal Data We Process

While using WebTrails, we process the following Service and Device Data:

Service Data	What we use it for and for how long
URLs and access time stored in your Chrome browsing history	 Service Provision (not stored by us) To generate detailed reports and provide users with insights into their browsing behaviour and habits.

WebTrails does not process Account, Billing and Device Data.