

## Privacy Notice for Trend Micro Products and Services

*Effective January 2017*

Trend Micro Incorporated, 225 East John Carpenter Freeway, Suite 1500, Irving, TX 75062, USA ("Trend Micro" or "we") provides this Privacy Notice to help you understand the types of information that you provide to Trend Micro, what we do with that information and how we protect that information when you use Trend Micro's products and services.

With Trend Micro products and services, you can increase the protection for your digital data from hackers, spammers, spyware, malware and other online threats. Because of the fast and constant evolving nature of online threats and malware, it is necessary to configure our products and services to constantly provide data and information from your devices to enable us to stay ahead of malicious activities and protect your devices and data.

### **What information do you provide?**

#### **Product license data**

When you install and activate our products, you provide information such as:

- name
- phone number
- email address
- device ID
- operating system
- license key

We use this information to ensure that your license to our solutions is valid and to contact you regarding renewals, technical issues and new product information.

#### **Smart Feedback data**

You provide the following types of information and data if you enable certain features such as Smart Feedback, a key feature of our Smart Protection Network (SPN). Providing these types of information and data enables you to participate, share and leverage Trend Micro's global database of threat related intelligence to rapidly identify and defend against potential threats within your unique network environment, as described in more detail below.

Product information

Public IP address

Mobile/PC environment

Metadata from suspicious executable files

URLs, Domains and IP addresses of websites visited

Metadata of client/device managed by gateway product

Application behaviors

Information from suspicious e-mail, including sender and receiver email address, and attachments

Detected malicious file information

Detected malicious network connection information

## How does Trend Micro use the data that you provide to us?

Trend Micro uses Smart Feedback collected data to understand threat behavior and reveal trends that lead to stronger security solutions.

- **Faster responses to threats:** SPN delivers our latest protection to you in real time. Compared to traditional signature updates, this approach dramatically reduces your window of vulnerability from (potentially) days to mere minutes.
- **Strong defense against targeted attacks:** Attackers have moved away from launching large scale attacks to focus on more specific and “personal” targets. Smart Feedback allows us to identify new sources and methods of attack.
- **Hidden threats revealed:** Using data collected from around the globe, Trend Micro uses big data analytics to identify critical relationships during an attack and shed light on well-hidden threats. This data also helps Trend Micro find zero-day vulnerabilities to deliver updated protection much more rapidly.
- **Improved results:** The real-time statistics collected by SPN improve the overall quality and performance of Trend Micro solutions

## How do we protect your information?

Trend Micro designs SPN to limit the collection of personal information as much as reasonably possible, by collecting data that cannot identify an individual where this is sufficient, stripping out specific personal information and keeping only redacted behavior profiles. Unavoidably, your computer will also send some information to SPN that can be connected to you, e.g. location information for mobile devices, or file names bearing identifiable details. But, even if and where information can theoretically be connected to an individual person, we do not normally try to make such connection for data reported by you and other users to SPN.

Beyond data aggregation and redaction, SPN also takes additional measures to keep data secure. SPN transfers data using SSL encryption in addition to destination server authentication. We also deploy other technical, administrative and organizational measures to protect the security of personal data, including access controls, premise security measures, secure data destruction and incident response plans.

## Where do we process your SPN data?

We process SPN data at data centers in the United States. When you connect to our services, you may be sending your information outside your country.

## SPN Data retention and deletion

Trend Micro retains Smart Feedback data only as needed for examining and updating the Smart Protection Network and other legitimate business purposes. Trend Micro regularly deletes Smart Feedback data every 6 months.

### **How do we share your data?**

We do not share data that you provide to us, except with service providers that help us perform and improve services for you; with your consent; as necessary to perform our contractual obligations to you; in order to protect your, our and others' rights and interests; in connection with a sale or reorganization of our business, if and to the extent permissible by law and as required to cooperate with any legal process and any law enforcement or other government inquiry. This means that we may provide information that we collect from you if that information is relevant to a court subpoena or to a law enforcement or other government investigation, provided this is permissible under applicable data protection law.

If you have any questions, requests, comments or concerns regarding this Privacy Policy, please email us at [legal\\_notice@trendmicro.com](mailto:legal_notice@trendmicro.com) or by sending a letter to Trend Micro Privacy Program, Trend Micro Incorporated, c/o Legal Department, 225 East John Carpenter Freeway, Suite 1500, Irving, TX 75062, USA.