

Privacy Policy for Trend Micro Products and Services

Effective March 2018

This Privacy Policy does not apply to you if you are a citizen or resident of the European Union, European Economic Area or the United Kingdom (please refer to our European Privacy Policy).

Trend Micro Incorporated and its subsidiaries and affiliates (collectively, "Trend Micro" or "we") provides this Privacy Policy 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.

Description of the product/service

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. This data and information can also include personal data.

What information do you provide?

Product license data

When you install and activate our products, you provide personal data such as your:

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

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

Information and personal data for using and interacting with Trend Micro's products and services

You provide the following types of information and personal data when you use and interact with our products and services, including customer support. The specific information and personal data that you provide will depend on the particular product or services used. Providing these types of information and personal 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 as well as enabling us to provide support that you request.

- Product information, such as MAC address, device ID,
- Public IP address of the user's gateway to the Internet

- 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
- Customer behavior
- Information from suspicious e-mail, including sender and receiver email address, and attachments
- Detected malicious file information
- Detected malicious network connection information
- Debug Logs
- Network Architecture/Topology
- Screen capture of errors

If you do not want to provide personal data to Trend Micro, please refer to your product documentation for further details on how to disable those features that collect and send feedback to Trend Micro, if applicable.

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

Our products use the personal data that you provide to perform security and threat detection related services and functions such as:

- Analyze data sent to/from your device(s) to isolate and identify threats, vulnerabilities, suspicious activity, and attacks;
- Assess the reputation of a device or file to advise you on whether access should be granted;
- Analyze email to protect against spam and other suspicious content;
- Virus protection;
- Intrusion detection, prevention, and protection;
- Threat prevention and prediction;
- Network defense;
- Identify sources and methods of targeted attacks
- Deliver updated protection against malicious threats

We may use information that you provide to us for other business purposes, including

- Internal record keeping
- Compliance with the law and requests from government bodies
- Product and service development
- Keeping you informed about our products, services and promotions
- Provide customer support, manage subscriptions, and respond to requests, questions, and comments

All the personal data stated above are necessary to enter into the contract with Trend Micro and to use Trend Micro's products and services so that you are obliged to provide such personal data, otherwise, we can neither perform our contract with you nor provide our products and services to you.

How do we protect your information?

We use administrative, organizational, technical, and physical safeguards, including access controls, premise security measures, secure data destruction and incident response plans to protect the information that you provide to us. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability.

Where do we process your data?

We may process your personal data at data centers in the United States as well as other locations around the world operated by Trend Micro, affiliates of Trend Micro or data processors engaged by Trend Micro who carry out data processing on behalf of Trend Micro. When you connect to our services, you may be sending your information outside your country to a jurisdiction that may not provide equivalent levels of data protection as your home jurisdiction

Data retention

We will keep information that you provide to us for as long as you are a registered subscriber or user of our products or for as long as we have another business purpose to do so and, thereafter, for no longer than is required or permitted by law.

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 authority or other government investigation, provided this is permissible under applicable data protection law.

Changes to the Trend Micro Privacy Policy

This Privacy Policy was last updated on January 2017. Trend Micro will occasionally update this Privacy Policy to reflect changes in our products and services and customer feedback. When we make changes to the Privacy Policy, we will revise the date at the top of the Privacy Policy. If there are material changes to this Privacy Policy or in how Trend Micro will use your personal information, Trend Micro will

notify either by prominently posting a notice of such changes prior to implementing the change or by directly sending you a notification.

Trend Micro contact information and inquiries

If you have any questions, requests, comments or concerns regarding this Privacy Policy, please email us at 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.