

## PRIVACY POLICY

This privacy policy describes the policies and practices of Comodo Security Solutions, Inc. and Comodo Security Solutions Ltd. (collectively and individually referred to herein as "Comodo"), and any Comodo affiliates on whose web site this policy is posted in collecting, using, and safeguarding the personal information that may be obtained through the use of Comodo's products, services and websites (collectively, the "Services"). This privacy policy applies to each of the Comodo entities, but not to Comodo's partners or affiliates, which may have separate privacy policies. This privacy policy does not extend to any information that is beyond the control of Comodo.

By using the Services and site, you agree to the collection, use, and disclosure of your information as described in this Privacy Policy, and agree to Comodo's Terms of Use, which are incorporated by reference. If you do not agree, please do not use or access the Site.

### QUICK GUIDE TO CONTENTS

1. [WHO WE ARE](#)
2. [INFORMATION COLLECTION](#)
3. [INFORMATION USE](#)
4. [INFORMATION SHARING](#)
5. [HOW LONG YOUR INFORMATION IS RETAINED FOR](#)
6. [YOUR RIGHTS](#)
7. [CHILDREN'S PRIVACY](#)
8. [DATA SECURITY](#)
9. [INTERNATIONAL TRANSFERS](#)
10. [REVISIONS TO THIS PRIVACY POLICY](#)
11. [CONTACT US](#)
12. [EXTERNAL LINKS](#)

### 1. WHO WE ARE

Comodo is a global leader in cyber security solutions including antivirus, internet security, firewall, endpoint security, cloud based solutions and other PC security software for enterprises and consumers.

#### *Data Controller*

For residents of the European Economic Area (EEA), Comodo Security Solutions, Limited (Registration number 06505055) is the data controller responsible for your personal data.

### 2. INFORMATION COLLECTION

There are several ways we may obtain information about you, including through (A) information you provide to us directly; (B) information that we automatically collect; and (C) information we receive from third parties. This includes data that identifies you personally whether directly (i.e. your name) or indirectly (i.e. information about your online use). See more at: [CSS Information Collection](#).

### *Information You Provide*

Personal information is collected from you when you choose to share it, such as when you are prompted for information when you subscribe to the Services, use a Comodo website, download a product, sign up for email, or request further information. The information we collect may include your name, address, email address, telephone or mobile number, IP address, and – if you're making a purchase – payment information.

You may also provide us with certain information in connection with specific actions:

- **Services, Product Downloads and Access**

Enrolling in Comodo's subscription service may require you to provide certain personal information and enter into a Subscriber Agreement. Nothing in this Privacy Policy is intended to modify the terms in the Subscriber Agreement. Downloading or accessing a product will often require you to provide personal information. With your consent, this information will be used by Comodo or its affiliates to contact the customer about Comodo's products and services, including product updates and associated promotional material. This information may also be used as collated general demographic information to improve Comodo's products and services.

If you make a purchase from us, we store an anonymized token and information (such as the last four digits and expiration date of a credit card, and billing address), or other payment information (such as via PayPal or Apple Pay), depending on the form of payment you choose.

- **Forums, Bulletin Boards, Testimonials, Chat Rooms, and Surveys**

Personal information submitted through a forum, bulletin board, testimonial, or chat room operated by Comodo may be collected, used, and read by third parties, including other users. Comodo is not responsible for any information submitted through these services. We occasionally request information from customers via surveys. Participation in these customer surveys is voluntary. Survey information is used to improve this web site and our services and products.

### *Information Automatically Collected*

With your consent, Comodo may contact customers about offers and opportunities from Comodo or its business partners, to conduct surveys, and gather feedback.

Personal information includes data that identifies you personally whether directly (i.e., your name) or indirectly (i.e., information about your online use). If you are located in California, IP addresses are considered personal information.

For Comodo Security Solutions, Inc. products and services, additional information collection is described in the policy at [CSS Information Collection](#).

- **Cookies & Other Computing Information**

A cookie is a piece of data stored on a computer's hard disk containing information about the owner. Comodo may employ the use of cookies for measuring the success of advertising and affiliate network membership. Cookies may be collected automatically or passively. Our partners may use cookies. Comodo does not exercise any access or control of such cookies.

Comodo's websites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"), to evaluate the use of the Comodo site. Google Analytics places a third party cookie on your computer that is then used to compile reports of visitor traffic and internet usage. Google Analytics does not have a database of individual profiles for each visitor and only collects aggregate data.

We may automatically collect your IP address, which can be collected as part of web server logs , or other unique identifier or information from the computer, mobile device, tablet or other device you use to access the Services, including the browser type, device type, operating system, software and software version, hardware model, mobile network information, and the domain name from which you accessed the Services. We also may collect information about your use of the Site, including the date and time you visit the Services, the areas or pages of the Services that you visit, the amount of time you spend viewing or using the Services, the number of times you return to the Services, other click-stream or site usage data, emails that you open, forward or click-through to our Services, and other sites that you may visit. The data may be used to help diagnose problems with our servers, analyze trends, track users' web page, email and mobile application movements/activities, help identify or gather broad demographic information for aggregate use.

- **Location**

We collect general information about where traffic and purchases on our Services are coming from around the world. This is used at an aggregate level (that does not identify individual users) to create reports to better understand our engagement with users.

- **Permissions**

With your express permission, certain Comodo Services, such as Comodo Mobile Security and Comodo Anti-Theft, allow the applications access to Global Positioning Data (GPS), cellular network, Google Analytics or other similar data. When requested by you, these applications also specifically access, modify and delete personal data and may send emails or messages from your device. Please review the end-user licensing agreement for each application or product and the associated permissions to obtain further details for a particular Service.

### ***Information from Third Parties***

We may also receive personal information from third parties.

#### *Third Party Features*

In the event that third party features and functionalities are incorporated in or made available in or through Comodo products, then the policies of those third parties apply. Please visit each third party's license agreement and privacy policy to better understand their terms of use and data collection practices.

### **3. INFORMATION USE**

We may use the information we collect from and about you for a variety of business purposes; in general to provide the services, improve customer experience and engagement and develop the Services. We are committed to protecting and maintaining the privacy of your information and we will process your data only in accordance with applicable data protection law and this Privacy Policy.

We will have a lawful basis for processing your data if:

- we need to process your information in order to provide you with the products or service you have requested or to enter into a contract;
- you have consented to such processing;
- we have a legitimate interest for processing your data – *e.g.*, for fraud prevention; direct marketing; network and information systems security; data analytics; enhancing modifying or improving our services; identifying usage trends; determining the effectiveness of promotional campaigns; and advertising personalisation of the service using data to make it easier and faster for you to place orders; and/or
- we are legally obliged to process it.

We may use your information when we have a lawful basis for processing such information, including for customer services and transactional purposes, and advertising customization and analytics purposes.

We may also use the information we collect from and about you for any of the following purposes:

- To respond to your inquiries, fulfill orders, and contact and communicate with you when necessary;
- To enhance your online experience, including as a way to recognize you and welcome you to the Services;
- To review the usage and operations of our Services, develop new products or services, and conduct analysis to enhance or improve our content, products, and services;
- To provide you with customized Services content, targeted offers, and advertising on the Services, via email, or across other websites, mobile applications, social media or online services;
- To contact you with information, newsletters and promotional materials from Comodo or on behalf of our partners and affiliates;
- To use your data in an aggregated non-specific format for analytical and demographic purposes (this processing may involve profiling – for example to create audiences based on demographic or location based information for marketing and customization purposes);
- To protect the security or integrity of the Services and our business, such as by protecting against and preventing fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users;
- To use and disclose your credit/debit card information only to process payments and prevent fraud; and
- For other purposes disclosed at the time you provide your information or otherwise with your consent.

Additionally, if you use the Services to connect with third party services you authorize us to use information from and about you, on your behalf, to interact with these third party services based on your requests.

#### **4. INFORMATION SHARING**

Comodo will share aggregated demographic and other information with our partners and affiliates (such as our sponsors, partners, advertisers, advertising networks, advertising servers and analytics companies or other third parties in connection with marketing, promotional, and other offers, as well as product information). It may also be shared in the event of the sale of a business or business assets. Your information may also be shared with third parties we identify at the time you provide your personal information or otherwise with your consent. You have the option to opt-in to receive direct marketing from these selected third parties.

Information provided to Comodo will be protected by Comodo and not sold or rented to any unrelated third parties without your express consent, except that Comodo may disclose data to its affiliates and business partners who have established similar privacy standards, when legally obligated to do so, or if disclosure is required to protect the rights over Comodo, Comodo's customers, or the users of Comodo's services. Comodo may also share aggregate demographic data that does not contain any personal information.

#### **5. HOW LONG YOUR INFORMATION IS RETAINED FOR**

We will keep your personal data for as long as we need it for the purpose it is being processed for. For example, we will retain your information for as long as your account is active or as needed to provide you services; and after that, we will keep the personal information for a period which enables us to handle or respond to any complaints, queries or concerns relating to your account. Your information may also be retained so that we can continue to improve your experience with us.

We retain the identifiable data we collect directly for marketing purposes for as little time as possible, after which we employ measures to permanently delete it or, in some cases, anonymize or de-identify the data. We will periodically review the personal information we hold and delete it securely, or in some cases anonymize it, when there is no longer a legal, business, or consumer need for it to be retained.

#### **6. YOUR RIGHTS**

We respect your privacy rights and provide you with reasonable access and rights to the personal data that you may have provided through your use of the Services. If you live in the European Economic Area (EEA), and wish to access, amend, delete, or transfer any personal information we hold about you, you may contact us as set forth in the "Contact Us" section.

You may update, correct, or delete your account information and preferences at any time by accessing your Account settings page on the Service. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain personal information with us, in which case we may not be able to provide to you some of the features and functionality of the Services.

At any time, you may object to the processing of your personal information, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact [privacy@comodo.com](mailto:privacy@comodo.com). You also have a right to lodge a complaint with data protection authorities.

### ***Cookies, Tracking Options and California Do Not Track Disclosures***

*For California Residents:* Certain parts of our Services require cookies. You are free to adjust your device or Internet browser settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features on the Services or take full advantage of all of our offerings. Please refer to your device's settings or your Internet browser's "Help" section for more information on how to delete and/or disable your device or browser from receiving cookies or controlling your tracking preferences.

Our system may not respond to Do Not Track requests or headers from some or all Internet browsers. We may use cookies or other technologies to deliver more relevant advertising and to link data collected across other computers or devices that you may use.

### ***Interest-Based Advertising Choices***

To understand your choices for receiving more relevant advertising provided on the Service or across other websites and online services, please review the information below:

To learn more about such interest-based advertising, and to opt out of such collection and use for interest-based advertising by the Digital Advertising Alliance (DAA) participating companies, please visit <http://www.aboutads.info/choices/>. To opt out from the use of information about your online activities for interest-based advertising by Network Advertising Initiative (NAI) member companies, please visit <http://www.networkadvertising.org/choices/>.

- If you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available [here](#).
- On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

Even if you opt out, you still may receive advertising from us that is not customized based on your use of the Services or usage information, or advertising from other third parties if they are not a DAA or NAI participating company.

### ***Other Choices Concerning the Use and Disclosure of Your Information***

You may occasionally receive information on products, services, and special deals from Comodo or may receive informational newsletters. Customers are given the opportunity to 'opt-out' of having information used for purposes not directly related to the Comodo service at the point where the information is requested. Customers who consented to receive marketing from Comodo may also elect not to receive additional promotional communications using the opt-out link provided in each promotional email or by emailing [optout@comodo.com](mailto:optout@comodo.com). Customers may not opt-out of receiving service announcement updates as they contain important security information about the services.

If you receive marketing communications from one or more Comodo affiliates, you must opt-out individually from each of the affiliates from which you are receiving brand-specific marketing communications.

### ***Your California Privacy Rights***

If you are a California resident, you may request information about our disclosure of personal information to third parties or affiliated companies for their direct marketing purposes. To make such a request, please contact us. You must put the statement “Your California Privacy Rights” in the subject field. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

Non-affiliated third parties are independent from Comodo and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.

## **7. CHILDREN’S PRIVACY**

Comodo sites, products and services are not directed to children under the age of 13 (up to age 16 in some countries) and we do not knowingly collect personal information from children under the age of 13 (up to age 16 in some countries). If we become aware that a child under the age of 13 (up to age 16 in some countries) has provided us with personal information, we will take steps to delete such information from our files as soon as possible.

## **8. SECURITY**

Comodo protects information both online and off-line. The transmission of information, including any payment information, is encrypted and protected using secure sockets layer (SSL) technology. Stored customer information is kept in a secure environment where access is restricted to employees who need the information to perform a specific job (for example billing administration or the development team). Employees are required to use password-protected screen-savers and keep their computers up-to-date.

## **9. INTERNATIONAL TRANSFERS**

Comodo is a global business and it, or its service providers, may process, transfer, and store information about our users on servers located in a number of countries outside the European Economic Area (EEA), including in the United States. Since we are committed to protecting your information, we take steps to ensure that there are appropriate safeguards in place when we transfer that data.

In the course of providing Services or otherwise, your data will be transferred to numerous countries including the United States. In some of these locations, data protection laws may be less stringent than in your country. To ensure that your data is adequately protected, we transfer your data subject to suitable safeguards being in place.

In particular, where we transfer your information outside the EEA, we rely on standard EU Model Clauses approved by the European Commission and we transfer the information in accordance with applicable laws and using adequate and appropriate safeguards.

To find out more about how we safeguard your information (including obtaining a copy of such safeguards) in relation to transfers outside the EEA, please contact us at [DPO-GDPR@comodo.com](mailto:DPO-GDPR@comodo.com).

## **10. REVISIONS TO THIS PRIVACY POLICY**

Comodo reserves the right to revise this privacy policy at any time. Any revisions will be made by posting the changes to the website. Customers must check the website periodically to be aware of any changes to the privacy statement. Your continued use of the website or Service constitutes your acceptance of those changes.

## **11. CONTACT US**

If you have any questions or concerns about this Privacy Policy or our practices, you may contact us at:

For individuals outside the European Economic Area:    For individuals in the European Economic Area:

Comodo Security Solutions, Inc.  
1255 Broad Street  
Clifton, New Jersey, U.S.A.

Attention: Privacy Coordinator  
Email: [privacy@comodo.com](mailto:privacy@comodo.com)

Comodo Security Solutions, Ltd.  
3rd Floor, 26 Office Village,  
Exchange Quay  
Trafford Road, Salford,  
Manchester, M5 3EQ, United Kingdom  
Attention: Data Protection Officer  
Email: [DPO-GDPR@comodo.com](mailto:DPO-GDPR@comodo.com)

## **12. EXTERNAL LINKS**

The Comodo website contains links to external websites which are outside the scope of this privacy statement. Comodo is not responsible for the privacy practices of such other sites and does not control the accuracy of information displayed by such websites.

*Effective as of May 25, 2018*