

# PRIVACY AND COOKIE POLICY

## Privacy and Cookie Policy

By using this Ally App, you use an app built on the Chime Platform of and offered by AVG Netherlands B.V. (“**AVG**”), a private limited liability company incorporated under the laws of the Netherlands. AVG has its registered office at Gatwickstraat 9-39, 1043 GL Amsterdam, the Netherlands. AVG acts as the data controller for the processing of your personal data via the Ally App. Amped Wireless Inc., the company that offers the router bought by you, does not collect or process personal data via the Ally App.

AVG treats personal data which it receives through the Ally App with due care and is dedicated to safeguarding any personal data it receives. This Privacy and Cookie Policy is designed to advise you about the type of information that AVG collects via the Ally App and the purposes for which this information is being processed, used, maintained and disclosed. By using the Ally App, you agree to the collection, use and sharing of your personal data in accordance with this Privacy and Cookie Policy. Please note that this Privacy and Cookie Policy

does not apply to any other AVG product, service or entity. Please note that this Privacy and Cookie Policy also does not apply to the collection, use or sharing of your personal data by Amped Wireless Inc. AVG is not responsible nor liable for any collection of personal data by Amped Wireless Inc. via your router or otherwise.

## **Which personal data do you collect and why?**

When you use the Ally App, we ask you to log-in with your AVG My Account details or to register. Please note that a specific privacy policy applies to AVG My Account, which policy can be found [here](#).

To create an account, we ask you to provide your e-mail address and create a password. Your e-mail address is used to send you a verification e-mail. After you create an account you will be asked to set up a personal WiFi hotspot and to protect that hotspot with a password for security reasons. Please note that the network name of your WiFi hotspot will be publicly visible. The router will store your WiFi SSID (Service Set Identifier), the network name and the password in order to enable you to use the Ally App.

The Ally App allows you to create user profiles in order to enable various features per profile, such as among others parental controls. If you want to create user profiles, you are required to provide a name for each user;

this can be a real name or a nickname. You will have the option to upload your photo and a photo for each of the other profiles that you have created. By uploading a photo, you represent that you are legally allowed to use the photo or that you have received express consent to use the photos.

We also collect certain data about the devices that are connected to your router. We do this so that you can see which devices are connected to the router. For each device, we store the MAC address (a unique identifier of a device) and the host name of the device. The host name is the default name of the device given by the manufacturer or the name given to the device by the owner of that device. We also collect information about when devices are connected or disconnected to the router, which allows you to see when devices are on- or offline. Furthermore, we collect the MAC address of your router, which allows us to uniquely link the router to you so that you can manage your devices and profiles and for our own reporting purposes. We may also collect your browser history (information about websites visited and online activity, including curfew settings if applicable), if you enable certain features. By using analytics, we may also collect your IP address, phone number, SIM, IMEI or MEID, Router ID, AVG Product license and identification numbers, geographic location based on GPS/WiFi communications network local information.

This data is used to improve the Ally App and your user experience.

If you decide to purchase one of the paid premium features of the Ally App, we will collect financial info (which includes credit, bank and consumer-specific financial information such as transaction data) in order to process your purchase and payment.

The Ally App offers you the possibility to block certain categories of websites for a profile. We therefore store your choices, in order to provide you this specific feature.

If you contact us for assistance, we will process the contact details provided by you in order to be able to provide support.

We will treat all personal information, which is either provided to us or collected via the Ally App, in accordance with this Privacy and Cookie Policy. We also automatically collect information via the use of cookies and web beacons, such as your IP address and the time and duration of your visit. Please find more information about the use of cookies below.

The above-mentioned data may, next to the purposes already described, be processed for the following purposes:

- to improve our products and services;
- to provide support;

- to send notifications, offers and promotions;
- to keep you informed of our services, changes in our services and other services which may be of interest to you;
- to administer or otherwise carry out our obligations in relation to any agreement you have with us;
- to comply with legal and/or regulatory requirements.

## **We do not collect**

The Ally App does not collect biometrics (information about your body, including fingerprints, facial recognition, signatures and/or voice print), contact info (including list of contacts, social networking connections or their phone numbers, postal, email and text addresses – as said we may collect your contact details if you contact us in order to be able to support you) or medical info (including health claims and other information used to measure health or wellness).

## **Cookies**

In addition to the above, AVG may use cookies or similar techniques whenever you interact with the Ally App. Cookies place small text files on your device which enables us to recognize your device each time you use the Ally App.

## **Which cookies or similar techniques are used and what do they do?**

The Ally App uses the following cookies or similar techniques:

### **1. Functional cookies or similar techniques**

We are locally storing data on the Ally App in a small database that is part of the Ally App in order to offer you the functionality of the Ally App. When you delete the Ally App, these data will automatically be deleted as well.

### **2. Analytics cookies**

The Ally App also uses analytics cookies placed by Google Analytics (including Google Tag Manager) to collect information about how you use the Ally App and its features. This information is used to improve the contents of the Ally App and to enhance your user experience.

## **Do you object to cookies?**

You cannot opt-out from functional cookies or similar techniques, since they are necessary to provide the Ally App to you. You can opt-out from the use of Google Analytics by changing your Privacy Settings in the Settings menu of the Ally App.

## **Do you share my data?**

AVG observes a strict duty of confidentiality about your personal information. AVG does not share, sell, rent, lend or disclose any of the personal data collected via the Ally App, other than with any of our affiliated AVG companies, without your consent, unless:

- when necessary to deliver the product or service you require such as with a payment card provider who we use to process your credit card transaction;
- when authorized by law or necessary to comply with a valid legal process;
- when required to protect and defend the rights or property of AVG, including the security of our products and services;
- when necessary to protect the personal safety, property or other rights of the public, AVG or its customers or employees; or
- in connection with a sale of all or part of our business, in order that the purchaser can continue to provide the Ally App to you.

If we are legally compelled to disclose your personal data to a third party, we will use commercially reasonable efforts to notify you in advance of a disclosure unless legally prohibited. If we are involved in a merger, acquisition or asset sale, we will abide by the Privacy and Cookie Policy, and any affected users will be informed if we transfer any personal data to a third party or if

personal data becomes subject to a different privacy policy as a result.

Furthermore, AVG may instruct third parties, located inside and outside of the European Economic Area, to perform services on our behalf with respect to the processing of your personal data. These service providers will assist us in providing information and/or services to you. It is our policy to only provide the amount of personal data that is necessary for the third parties to perform the requested service. Your personal data is provided subject to agreements which state that the service providers must keep such information confidential, that the data is not to be used for its own purposes and that all information will be used in accordance with applicable privacy legislation, including strict provisions in the light of data security.

## **Third-party websites/apps**

Periodically, the Ally App may contain links to and from websites or other external destinations managed by third parties. If you follow a link to any of these destinations (like offers on mobile app stores etc.), please note that those sites have their own privacy policy. When you are on those sites or using those apps you are subject to those policies, and should therefore read and understand them before you submit any personal data to those sites.



We may also link to co-branded websites or products that are maintained by AVG and one or more of our business partners. Please note that these co-branded websites and products may have their own privacy policy, which we encourage you to read and understand.

## **What rights do I have over my personal data?**

You have the right to ask us about the personal data we process about you, the purpose and nature of the processing, and to provide information on who we share it with.

Under California Civil Code sections 1798.83, California residents may request a notice describing what categories of personal customer information AVG shares with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. To the extent applicable to AVG, such notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: AVG Netherlands B.V., Attn. Legal Department, Gatwickstraat 9-39, 1043 GL Amsterdam, the Netherlands. Please specify that you are requesting the

California Privacy Rights Notice for AVG and allow at least 30 days for a response.

You have the right to request that we update, correct, or delete (assuming that this does not impact the services we are providing to you) your personal data at any time.

Please note that we may reject requests which risk the privacy of others or are unreasonable or repetitive, would require disproportionate effort, or would violate law.

You have the right to opt out of the use or collection of certain personal data. Please contact us via:

[chimeprivacy@avg.com](mailto:chimeprivacy@avg.com) to do so. You have the right to opt-out of receiving our emails (newsletters, product alerts, special offers etc.) or other information at any time by following the instructions [here](#) or the relevant unsubscribe process outlined in the applicable email or newsletter or by changing your Privacy Settings in the Settings menu of the Ally App. Please note that you cannot unsubscribe from some of our account-related emails, such as password reset requests and direct responses from our Customer Care team.

You have the right to expect us to protect your personal data and keep it safe. We work hard to protect AVG and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of the information we hold.

## **Changes to this Privacy and Cookie Policy**

We reserve the right to change this Privacy and Cookie Policy at any time, and will indicate the date the Privacy and Cookie Policy was most recently updated. If there have been significant changes, we will highlight any such changes, and will attempt to directly alert you when possible. We will also keep prior versions of this Privacy and Cookie Policy in an archive for your review. We encourage you to periodically review this Privacy and Cookie Policy for the latest information on our privacy practices related to the Ally App.

Changes to our privacy policy since the latest version include:

- This is the first version, dated: August 24, 2016.

## **How can I contact you?**

If have any questions about this Privacy and Cookie Policy or any of the above, please email us at [chimeprivacy@avg.com](mailto:chimeprivacy@avg.com). You may contact us by mail at:

AVG Netherlands B.V.  
Attn. Legal Department  
Gatwickstraat 9-39,  
1043 GL Amsterdam  
The Netherlands

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