

TREND MICRO PRIVACY POLICY (Updated May 2012)

Trend Micro Incorporated and its subsidiaries and affiliates (collectively, "Trend Micro") are committed to protecting your privacy and ensuring you have a positive experience on our websites and in using our products and services ("Trend Micro Products and Services"). This Privacy Policy applies to Trend Micro websites that link to this Statement but does not apply to those Trend Micro websites that have their own privacy policy or to websites hosted by third parties authorized to display the Trend Micro name and/or corporate logo.

Our Privacy Policy explains the following:

- A. Why does Trend Micro collect your personal information?
- B. Collection and use of your personal information
- C. Communication preferences
- D. Sharing your personal information
- E. Security of your personal information
- F. Use of cookies and other technology
- G. Managing your personal information
- H. Collection and use of non-personal information
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A. Why does Trend Micro collect your personal information?

Trend Micro collects personal information to provide its products, services and support to its customers. Many of our services require you to set up an account and complete your purchase. This information is helpful in providing you the services and support you expect from Trend Micro and that is of interest to you.

B. Collection and use of your personal information

Trend Micro collects personal information in many ways: when you place orders on our website or purchase one of our products or services, download free evaluation software or upgrades, when you register as a customer, when you contact Trend Micro through our "Contact Us" link on our website, when you participate in a campaign or a website forum or referral promotions, when you request a quote or technical support, when you subscribe to Trend Micro newsletters or receive product updates or technical alerts, when you enter a contest, giveaway, promotion or special offer, when you provide us with feedback or opinion, or when you apply for a job online with Trend Micro.

Trend Micro collects only personal information required to respond to or address your request, improve your experience on our website, understand and meet your needs, track customer preferences, communicate with or notify you of updates or services or benefits available, award prizes, provide you with the services you request, complete a transaction or confirm an order, complete an offer or to manage, evaluate your interest in employment in the case of employment applications submitted by you, renew or terminate your subscription or to improve the products and services we provide you. This personal information may include but not be limited to name, company name, billing and shipping information, email address, phone number, credit card or payment information and other relevant information. We use your credit card or payment information to process an order or transaction and for no other purpose without your consent.

Trend Micro will maintain your personal information only for as long as you are a registered Trend Micro customer or end user or as is reasonably necessary for audit or internal purposes or as needed to provide you with information you request unless a longer retention period is required or permitted by law.

C. Communication Preferences

Trend Micro gives you the choice of receiving a variety of information that complements our products and services. You can manage your communication preferences and unsubscribe in one of the following ways: (a) Trend Micro promotional emails include instructions on how you can unsubscribe from that particular communication; or (b) sending a message via email to legalnotice@trendmicro.com or via mail to Trend Micro Incorporated, c/o Legal Department, 10101 N. De Anza Blvd, Cupertino, CA 95014, USA. Please include your name, email address and specific relevant information about the material that you no longer wish to receive. These choices do not apply to the receipt of mandatory product or service communications that are considered part of certain products or services, which you may receive periodically unless you terminate the license relating to such products or services in accordance with the application end user license agreement.

D. Sharing your personal information

Trend Micro is a global organization. Trend Micro may share personal information with its affiliated companies, resellers, distributors or partners in order to provide the high quality, localized services or offers you have requested, meet your needs or provide you with customer support. Trend Micro may engage contractors to provide certain services, such as providing technical support, handling order processing or shipping products, conduct customer research or satisfaction surveys.

For example, if you choose to purchase a license to a Trend Micro product on our website, you will be directed to the website of one of Trend Micro's e-commerce resellers, such as Digital River, in order to purchase the license. Trend Micro and the pertinent e-commerce reseller will need to share some of your personal information. Trend Micro requires that all contractors keep personal information of our customers secure and confidential and that they do not share such personal information with others or use your personal information for their own marketing purposes.

It may be necessary by law, legal process, litigation and/or requests from public and governmental

authorities within or outside your country of residence for Trend Micro to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement or other issues of public importance, disclosure is necessary or appropriate.

Trend Micro may also disclose information if we determine that disclosure is necessary to enforce our terms and conditions or protect our products or users. In addition, in the event of a reorganization, merger or sale, we may transfer any and all personal information we collect to the relevant third party.

E. Protection of personal information

As a global security leader, Trend Micro understands the importance of securing your personal information. Trend Micro has taken appropriate security measures – including administrative, technical and physical measures - to maintain and protect your personal information against loss, theft, misuse, unauthorized access, disclosure, alteration and destruction. Access to your personal information is restricted to authorized personnel only.

F. Use of cookies and other technology

Trend Micro's website, online services, interactive applications and email messages may use "cookies" and other technologies such as web beacons. Cookies are alphanumeric identifiers that Trend Micro transfers to your computer's hard drive through your web browser to enable our systems to recognize your browser to provide services. Cookies help websites work or work more efficiently and can help provide us with business and marketing information. They also enable a website to tailor information presented to you based on your browsing preferences such as language and geographical region.

Trend Micro may use cookies to personalize web pages during your visit to our web sites; and/or remember you for easy navigation and access during return visits after registering for product and service information, sales contacts and other offers including but not limited to White papers, webcasts, events, evaluation software, etc., provide information about the previous link used by you, track your visits to our website, aggregate and analyze data about your machine, such as browser type, screen resolution, operating system; or about the Trend Micro product installed on your machine, such as product ID and days remaining to expiration and your license SKU. This information, which does not personally identify you, is used to determine what content to serve to you when you land on our pages and to provide you with the offers of Trend Micro products and services that are most relevant to you. The data collected by the cookie expires after 14 days unless you visit our website again. Cookies may also be used to serve you with banner ads if you exit our store without purchasing. These cookies expire automatically within 30 days.

If you have registered your product and created a Trend Micro account, we will match the information gathered from our cookies with any information you have given us about yourself, or that is stored in your Trend Micro account, or that we have otherwise collected about you for the purposes explained in this Privacy Policy.

If you do not want Trend Micro to deploy cookies in your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software. Rejecting

cookies may affect your ability to use of some of our products and/or services.

You can also visit <http://www.coremetrics.com/company/privacy.php#optout> for additional information on how to opt out of receiving marketing cookies.

Trend Micro also uses “web beacons” (or single pixel or clear GIFs) on our website to analyze traffic patterns such as the frequency of use of particular parts of our website. The data collected helps us learn what information is of most interest to our customers and what our customers would most like to see. You can opt-out of this analysis by disabling JavaScript on your computer but note that if you do so, some of the features on our website will not work. The information collected is generally anonymized and is not used to identify any particular user. Trend Micro has no access or control of any third party tracking technologies.

G. Managing your personal information

If you participate in a Trend Micro discussion forum on our website, you should be aware that the information you provide there will be made broadly available to others, and can be read, collected or used by other users of these forums, inside or outside of Trend Micro. This information can be used to send you unsolicited messages. You are responsible for the personal information you choose to submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please be careful and responsible when you are participating in any forum or discussion group on Trend Micro websites and note that some of these forums may have additional rules and conditions. Each participant’s opinion on a forum in our website is his or her own and should not be considered as reflecting the opinion of Trend Micro. Trend Micro is not responsible for the personal information or any other information you choose to submit in these forums.

You have the right to update your personal information on your Trend Micro account or by contacting Trend Micro as noted below. If requested, and to the extent permissible by applicable law relating to the retention of records or otherwise not required for valid business purposes (such as fulfillment of transactions), you may request that your personal information be removed from Trend Micro’s systems.

H. Collection and use of non-personal information

Trend Micro also collects non-personal information which means data that does not relate to a single, identifiable customer or end user. Trend Micro may collect, use, transfer and disclose non-personal information for any purpose. Trend Micro may collect certain information to better understand customer behavior and improved our products, services and advertising. We may also collect information regarding customer activities on Trend Micro’s website and from our products and services. This information is aggregated and used to help Trend Micro provide more useful information to our customers, to understand and analyze trends, understand which parts or pages of our website, administer the site, to learn about user behavior on the site and understand which products and services are of most interest to our customers, to gather demographic information about our customer base as a whole and to improve our customers’ experience. Trend Micro collects this information through cookies or web beacons.

Trend Micro also collects log files of traffic that visit our websites. These log files may include information such as your Internet Protocol (IP) address, browser information and language, domain name, date and time of request. We use this information to track aggregate traffic patterns throughout our website but such information does not correlate with any personally identifiable information. Trend Micro may collect and retain for a certain period IP address information of customers in order to provide technical support, obtain geo-location information, for subscription and registration purposes and to secure our networks and systems. Trend Micro treats this information as non-personal information. However, to the extent that IP addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for purposes of this Privacy Policy.

I. Third-Party websites and services

Trend Micro's website contains a number of links to websites of Trend Micro business partners or to co-branded websites that are maintained by Trend Micro and one or more of our business partners who are collecting your information pursuant to their own policies and purposes. You should carefully read the privacy policies on such websites or co-branded websites as they may differ from Trend Micro's Privacy Policy, especially as information collected on such websites is governed by the pertinent privacy policies. Trend Micro is not responsible for the content, their privacy practices or misuse of any information you provide on those websites.

J. Children

Trend Micro does not knowingly collect personal information from children under the age of 13. If we learn that we have collected the personal information of a child under the age of 13, Trend Micro will delete the information as soon as possible.

K. European Economic Area (EEA) customers

With respect to data transfers from the EEA to the United States or to other countries outside the EEA, Trend Micro has taken steps to ensure adequate protection for such data transfers in accordance with European data protection legislation. Trend Micro has entered into appropriate data transfer agreements based on the standard contractual clauses approved by the European Commission to provide adequate protection for data transfers between Trend Micro entities and between Trend Micro entities and third parties located outside the EEA, as necessary.

L. Changes to the Trend Micro Privacy Policy

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.

M. Trend Micro contact information and inquiries

If you have any questions, comments or concerns regarding this Privacy Policy or if you would like to change your communication preferences, update or review personal information we have about you or withdraw your consent for the collection, use or disclosure of your personal information, please email us at legalnotice@trendmicro.com or by sending a letter to Trend Micro Privacy Program, Trend Micro Incorporated, c/o Legal Department, 10101 N. De Anza Blvd, Cupertino, CA 95014, USA.