

# ARCHIVE

# LifeLock Privacy Policy

Effective: June 10, 2019 to January 1, 2020

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## Our Mission

LifeLock, Inc. ("LifeLock", "we", "our" or "us") is committed to enriching lives by protecting what matters most. This includes safeguarding your Personal Information (defined below), and treating such information with security and respect. We understand the need to feel safe when sharing information with third parties, and we have developed this Privacy Policy to help you understand our practices and how to exercise choice regarding the collection and use of your personal information.

## Scope and Other Agreements and Notices

Our Privacy Policy applies to information about you that is gathered automatically ("General Information") and to Personal Information (as defined below) that we collect directly from you online and offline, as well as information we collect about you from other sources, such as from third party partners and affiliates, which we may append to other information we collect from or about you. This Privacy Policy applies to visitors and users of our website, [www.lifelock.com](http://www.lifelock.com) (our "Site") (including the mobile app version of our Site), users of Services that we provide at no charge ("Users"), users of Services that require payment of a fee ("Members") (we refer to our Users and Members collectively as our "Customers"), and prospective Customers. [See more about information we collect and how we use and share it.](#)

In addition to this Privacy Policy, other contract terms such as our LifeLock, Inc. Service Terms and Conditions (the "Service Terms") and our [Website Terms of Use](#), will apply to you, based on the Services you select or use. If you use other Services, additional privacy terms may also be applicable.

Also, for Users of Symantec Norton products and services, please click [here](#) to find the Symantec Global Privacy Statement and related Product Privacy Notices.

**IF YOU DO NOT AGREE TO OUR PRACTICES AS DESCRIBED IN THIS POLICY, DO NOT USE OUR SITE AND SERVICES.**

## LifeLock's Commitment

We are committed to (1) working with our Customers to obtain a fair resolution of any complaint or concern about privacy concerns and our Services, and (2) supporting law enforcement and regulatory agencies committed to stopping crimes of identity theft and identity fraud. To contact us with a question or concern about our privacy practices, email us at [privacy@lifelock.com](mailto:privacy@lifelock.com) or write to us at LifeLock, Inc., Attn. Chief Privacy Officer, 60 E. Rio Salado Parkway, Tempe, AZ 85281.

## Modifications

WE MAY MODIFY OUR POLICY FROM TIME TO TIME. WE WILL POST THOSE MODIFICATIONS OF OUR WEBSITE [HERE](#) PRIOR TO THE MODIFICATIONS BECOMING EFFECTIVE. WE WILL NOTIFY YOU OF MATERIAL MODIFICATIONS TO THIS PRIVACY POLICY, INCLUDING SENDING YOU A COPY OF THE UPDATED POLICY BY EMAIL IF WE HAVE YOUR EMAIL ADDRESS ON FILE, PRIOR TO THE CHANGE BECOMING EFFECTIVE. YOUR CONTINUED USE OF THE SITE OR OUR SERVICES AFTER ANY SUCH MODIFICATION MEANS THAT YOU ACCEPT THE MODIFIED POLICY. EACH TIME YOU USE THE SITE, THE LATEST VERSION OF THE POLICY WILL BE DISPLAYED AND WILL APPLY.

## Members and Users

You need not enroll or register with us to just visit and view our Site. However, if you elect to obtain or use any of our Services you must register or enroll (or be enrolled by an authorized third party) with us, and you must agree to our [Service Terms](#), which incorporate by reference this Privacy Policy.

## Third Party Websites

Our Site may be linked to other web sites operated by one or more third-parties (collectively, "Third-Party Sites"). Certain areas of our Site may allow you to interact with Third-Party Sites and, in certain situations, you may be transferred to a Third-Party Site through a link but it may appear that you are still on our Site. The Third-Party Sites may have different privacy policies and terms and conditions and/or business practices than we do, and your use of Third-Party Sites is governed by that Third-Party Site's privacy policy and terms and conditions.

Some of our pages also utilize framing techniques to serve content to or from our partners while preserving the look and feel of our site. Please be aware that you are providing your personal information to these third parties and not to LifeLock.

## **Information We Collect**

We may collect information about you from a variety of sources, including information we gather from you directly when you register or enroll (or are enrolled by an authorized third party), use our Services, or view our Site or our online advertisements. We may also gather information from other sources as described below.

## **Information We Collect When You Visit Our Site or View Our Online Advertisements**

We LifeLock and the third parties we engage to perform analytics or advertising use cookies or similar technologies to administer and improve our Site and the content on it, including to track user movements around the Site, to gather usage information and statistics about how our Site is used, to permit users to log in or make purchases, to store user preferences, to customize content, and for marketing and advertising purposes. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We may combine the information we have automatically collected from you with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality, to develop new products and services, and to customize content and advertising to you.

The following are some examples of information we may collect with Cookies, log files, Web Beacons, GIFs, pixel tags, server logs, customer relationship management ("CRM") tools or other technologies that gather information automatically when you visit our Site or view online advertisements:

- Website pages you view
- IP address
- Emails from LifeLock that you open or forward
- LifeLock offers or links you connect to

In connection with the Site, for example during the enrollment process or upon log into your member portal, information about your computer, such as the device id and other accompanying technical attributes and characteristics, may be accessed, retained and used by us or our service provider to confirm device identification, verify your identity, and to authenticate your account.

## **Information We Collect Directly From You**

Some Personal Information is collected when you register or enroll for the Services, otherwise agree to provide information directly to us, or are enrolled for the Services by an authorized third party. Here are some of the kinds of Personal Information we may collect directly from you or an authorized third party:

- Name
- Contact information (email address, postal address, phone number)
- Social Security Number
- Date of Birth, Age, Gender
- Personal details to verify your identity, such as your mother's maiden name
- Payment and Financial Information, such as a credit card or financial account number
- Government identity information, for example, driver's license information, voluntarily identified by you in your Member portal
- Other information you may voluntarily provide for protection on the Member portal, such as your insurance information
- Product Preferences and interests
- Communication Preferences
- Contact Information for friends or family members that you wish to register as members or that you suggest we contact. Your family member may contact us at [Privacy@LifeLock.com](mailto:Privacy@LifeLock.com) to request that we remove this information from our LifeLock database.

- Other information that you may voluntarily provide in response to member surveys or studies or as part of enrollment in a new product or service
- When you call or exchange emails with us, we will retain the content of the email messages (or hard copy correspondence) as required or permitted by law and our record and information management policies. We also may retain recordings of our phone messages or phone calls with you.

## **Information we collect from other sources ("Third Party Information")**

We may obtain information about you from third party sources, such as the companies we work with to provide service to you (i.e., our service partners), affiliates such as our subsidiary, ID Analytics and other companies that we acquire or merge with, data aggregators or public databases. Here are examples of this kind of Third Party Information:

- Name
- Age
- Postal Address
- Phone Number
- Marital status and number of children
- Other information which may help us determine your risk of identity theft such as online behavior, purchase behavior, interests and other consumer and market research data
- Information used to populate our membership registration forms
- Information such as your social security number and date of birth, obtained from our subsidiary, ID Analytics, other affiliates or service partners.

## How We Use and Share Your Information

This summary tells you how we use your information, if we share it and why. It also explains how you can make decisions about these actions and how we will respond to those requests. We will share your personal information with third parties only in the ways that are described in this privacy policy, or otherwise where we have your consent. We do not sell your personal information to third parties. When we share your Personal Information with third parties as described below, we put in place contracts with them that include confidentiality restrictions on their use of your information and that require them to notify us if your Personal Information is lost, stolen or otherwise wrongly disclosed.

<b>Why do we USE your information?</b>	<b>Do we SHARE this information with others?</b>	<b>What information is shared?</b>	<b>Can you limit this sharing?</b>
To understand Site demographics and use of the Internet	Yes. We share with our affiliates and third party service providers to help improve our products, service offerings, Site, and technology	General Information	You may block cookies through your browser settings, which prevents us from collecting certain information about your use of our Site and our Services. We may still collect information about your use of our Services, such as when you log in, and analyze this information to help understand the use of our Site.
In the course of providing Services you request, verifying your identity, notifying you of new features, Services, or changes in our business or to process, and fulfilling or billing your orders or requests.	Yes with the following: <ul style="list-style-type: none"> <li>• other members registered under your account</li> <li>• our Affiliates</li> <li>• third party service providers, for example insurance companies, customer rewards programs, payment verification services, and financial institutions</li> <li>• Government agencies and law enforcement (in</li> </ul>	General Information; Personal Information	No. This is necessary to provide the Services, including updates about features and functionalities of the products and services to which you subscribe. The information requested may differ depending on the Service(s) you select. This use of your information is separate and distinct from marketing uses, which you may opt-out of, and which are discussed below.

	<p>helping address identity theft)</p> <ul style="list-style-type: none"> <li>• consumer reporting agencies</li> </ul>		
<p>When we, or our affiliates, send you marketing material about services, promotions or other material which may be of interest to you, through e-mail, interactive voice response telephone technology, direct mail or other means.</p>	<p>Yes, with our affiliates and to third party service providers who are under contract with us to provide our direct mail or other marketing efforts</p>	<p>General Information. Personal Information such as Name, Address, Email Address, or Phone Number Third Party Information</p>	<p>Yes, by opting out of communications in your preferences or by contacting us at 1-800-543-3562 or edit your <a href="#">email preferences</a> or by regular mail at Attn.: Marketing, 60 East Rio Salado Parkway, Suite 400, Tempe, AZ</p>
<p>Behavioral or Interest-based Advertising (to send you focused advertising)</p>	<p>Yes, with service providers and network advertisers (as described under "Behavioral or Interest-based Advertising")</p>	<p>General Information Elements of your Personal Information such as Name, Address, Email Address, and Phone Number. Third Party Information</p>	<p>Yes, you may exercise your options to not receive behavioral advertising, including targeted ads about LifeLock products on certain third party sites, as described in "Tracking and Interest Based Advertising" below. Exercise your choice to limit use of your information by LifeLock for behavioral advertising purposes <a href="#">here</a>.</p>
<p>To develop new products and services</p>	<p>Yes, with our affiliates for their own product and service development and with consultants or other third parties under contract with us to develop products and services, such as engineers, web developers and the like</p>	<p>General Information Third Party Information</p>	<p>No</p>
<p>As part of our thought leadership on the impact and risk of identity theft, and for education</p>	<p>Yes, with our affiliates and third parties but this information will not be used to identify any single individual</p>	<p>Aggregate information that is derived from your Personal Information, meaning general statistics, summaries and the like</p>	<p>No</p>

To investigate misconduct or a crime, to comply with law, or when we believes it is necessary to protect our rights, property or safety or that of others	Yes, with law enforcement, attorneys, officers of the court, arbitrators, mediators and others involved in any judicial proceeding, court order, similar legal process or the like	General Information Personal Information Third Party Information	No
To conduct data analysis and research relating to the risk and prevention of identity theft and related crimes	Yes, with our affiliates and third parties under contract with us to protect the information; to law enforcement or other government entity	General Information Personal Information Third Party Information	No
In connection with our sale, purchase, merger or reorganization	Yes, with the acquiring, purchasing, or other applicable entity, including, without limitation, legal and financial advisors and other persons or entities as appropriate	General Information Personal Information Third Party Information	No

## Security Standards

The security of your Personal Information is important to us and we have put into place multi-layered technical, physical and procedural measures to help keep it safe. For example, we keep Personal Information encrypted during transit and at rest using strong encryption technology and employ proactive monitoring and other tools to protect against unauthorized access. We work with third parties on an ongoing basis to keep our practices current and undergo annual third party audits that examine our practices on security and privacy.

Despite our mutual efforts, you understand and agree that perfect security does not exist and understand that there is a certain amount of risk inherent in providing and receiving services over the internet. The Services depend upon your commitment to keep your Personal Information safe. You agree to use your Personal Information in a reasonable way and to avoid recklessly disclosing your Social Security number, financial account numbers or other Personal Information to those that could improperly use or disclose it. For example, take care not to visit sites that may transmit malware, or to respond to “phishing” scams, unsolicited emails, or pop-up messages requesting your Personal Information. You may have the opportunity to participate in contests, blogs, promotions or other functions by way of the Site. Use caution when deciding to disclose your information in such a submission as these functions may be provided by a Third Party Website and subject to terms which are different than those stated in this Privacy Policy.

If you have any questions about the security of your Personal Information or the security of the site, or to report a potential security issue, please go to [lifelock.com/security](https://lifelock.com/security). If you have a potential security issue, please describe the matter in as much detail as possible and include any other data that might be helpful. If you are having problems accessing your account, please contact our Member Support Center.

## **Referrals**

If you choose to use our referral service to tell a friend about our Site, we will ask you for your friend's email address. We will automatically send your friend a one-time email inviting him or her to visit the Site. We store this information for the sole purpose of sending this one-time email. Your friend may contact us at [Privacy@Lifelock.com](mailto:Privacy@Lifelock.com) to request that we remove this information from our database.

## **Single Sign-On**

You can log into our Site using sign-in services such as an Open ID provider or online banking account. These services will authenticate your identity and provide you the option to share with us certain Personal Information. If you choose to share your Personal Information, such as your name, email address, or bank account information, we will collect this information, use it to pre-populate your account profile, and combine it with any other information that we collect about you.

## **Social Media**

Our Site may include Social Media Features, such as the Facebook Like button and widgets, such as the "Share this" button or interactive mini-programs that run on our Site. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly and for other purposes. Social Media Features and Widgets are displayed on our Site, but are hosted by the third party identified in the widget. These Social Media Features and Widgets are subject to their own privacy policies, not this one, and their privacy practices may differ from those on this Site.

## Testimonials

We display personal testimonials of customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at [Privacy@LifeLock.com](mailto:Privacy@LifeLock.com)

## Children's Privacy

We believe it is important to provide added protection for children on the internet and encourage parents and guardians to work with their children to understand how to be safe online. Our Site is not intended for the use by anyone under the age of eighteen (18) but parents or guardians may enroll minors for certain Services we offer. Other than as specifically described herein, we do not want or intend to collect or request Personal Information from anyone under the age of eighteen on this Site.

## Marketing

If you provide us with your email address or mailing address, you may receive marketing messages and materials from us or our affiliates. You have choices on what communications you want to receive from us. Marketing materials for our Services may also be included in messages you receive from our partners (which may include your employer if they offer our services as part of their employee benefits) or service providers that offer our services as part of a special offer. If you choose not to receive marketing communications that we send, we will honor your request. However, we will continue to communicate with you as needed to provide the Services, respond to your inquiries or otherwise relay service related messages. You may still receive information about our Services through other parties using their own mailing lists.

You can stop receiving promotional email or postal communications from us by following the instructions included in each communication, [by changing your preferences in your member portal](#), or by contacting us at 1-800-543-3562 or by regular mail at Attn.: Marketing, 60 East Rio Salado Parkway, Suite 400, Tempe, AZ.

## Do-Not-Track

Currently, we do not honor browser requests not to be tracked online (known as "Do Not Track"). You may opt-out, however, of being tracked for purposes of online advertising as set forth in the section below (Behavioral or Interest-Based Advertising). You also may opt-out of the collection of information through cookies and other tracking technologies through your browser settings, as described in this Privacy Policy.

## Behavioral or Interest-based Advertising

We partner with third parties to either display advertising on our Site or to manage our advertising on other websites. For example, we use third parties such as network advertisers to display advertisements on our Site and other websites you may visit. Network advertisers are third parties that display advertisements based on your visits to our Site as well as other websites. This enables us and these third parties to advertise more effectively by displaying ads for products and services in which you might be interested. Third party ad network providers, advertisers, sponsors and/or traffic measurement services may use some of the technologies described in this policy, such as cookies, JavaScript, web beacons (including clear GIFs) to measure the effectiveness of their ads and to personalize advertising content to you. This helps us, and them, provide advertising content to you that is more relevant and tailored to your interests. As with links to other websites that may be found on our Site, these Tracking Technologies are governed by each third party's privacy policy, not this one.

We may provide these third-party advertisers with non-personally identifiable information about your usage of our Site and our Services, as well as aggregate or non-personally identifiable information about visitors to our Site and users of our Services. We do not provide these third parties with your Personal Information. If you don't want us to show you interest-based ads or share interest-based behavioral data with third parties, you can opt out (see below). Understand that even after opting out you will still see online ads. Opting out only means that network members from whose ad networks you have opted out will no longer deliver targeted content to you. You may continue to see interest-based advertisements from other parties from whom you have not opted out, or from companies that have not adopted the self-regulatory standards for Online Behavioral Advertising that we follow. You will also continue to receive generic ads that aren't targeted based on your visits to multiple websites.

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"). For more information and available choices for third-party ad networks operated by NAI and DAA members, please visit their respective websites: [www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp) (NAI) and [www.aboutads.info/choices](http://www.aboutads.info/choices) (DAA). Opting out of these networks does not otherwise limit the collection of Personal or General Information described elsewhere in this Policy.

As noted, we also participate in third party ad networks and use cookies to improve the performance of our advertising on third-party websites, including to display ads about LifeLock products on these sites. You may control our use of the General Information we collect about your activities on our Site to display targeted LifeLock advertising during your visits to third party websites. To opt out of receiving these targeted LifeLock ads, click [here](#). Opting out of participation in LifeLock's targeted advertising

does not opt you out of our use of General Information for other purposes, such as analytics supporting optimization of our Site or development of new Products and Services.

Note: If your browser is configured to reject cookies when you visit the opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your opt-out may no longer be effective. Additional information is available on NAI's and DAA's websites accessible by the above links.

## **Special Notice to California Consumers**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information to third parties for the third parties' direct marketing purposes. We may share your Personal Information with our affiliates for direct marketing, but we do not sell it to or share it with unaffiliated third parties. You may request a list of our affiliates by contacting us at LifeLock, Attn.: Marketing, 60 East Rio Salado Parkway, Suite 400, Tempe, AZ. You may make one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. Please allow up to thirty (30) days for a response.

## **Your Access to Your Information**

Upon request LifeLock will provide you with information about whether we hold any of your personal information. You may access, update, and correct the Personal Information you have provided to us on the Site by logging into your member portal and selecting the account or member information options. If you are not a member and want to know what Personal Information we have about you, you need to contact us in writing by postal mail with this request at the address set out in the "Contact Us" paragraph below. We will respond to your inquiry within ten business days. If you cancel your Services, we may retain your information in accordance with this section. We will retain your information as follows:

- for as long as your membership is active
- as needed to provide you Services
- as required by company policy or legal obligation
- as needed to resolve disputes
- as needed to enforce our agreements

## Contact Us

If you have any questions about this Policy, please contact us at 1-800-LifeLock (543-3562), at [privacy@lifelock.com](mailto:privacy@lifelock.com), or by mail at LifeLock, 60 East Rio Salado Parkway, Suite 400, Tempe, AZ 85281, Attn.: Chief Privacy Officer. You hereby agree that we may use and disclose any suggestions, ideas, concepts, or information (other than your Personal Information) that you provide to us regarding the Privacy Policy, our business, or any other matter, without obligation to you or any third party.

## Definitions Used in this Policy

**Cookies.** Cookies are small text files that are stored by a user's web browser on the hard drive of a user's computer. Cookies can "remember" what information ("Cookie Information") a user accesses on a particular web page to simplify subsequent interactions with that website by the same user, or cookies can use that information to streamline the user's transactions on related websites. The cookies we use on our Site may be "session" cookies that are erased when you leave the Site, or they may be "persistent" cookies that remain on your computer's hard drive after you leave the Site. We also use a cookie installed by Google, Inc. to provide us with usage information regarding the Site. The cookies we use do not capture your Personal Information. We may also set cookies when you register at the Site, and may do so without notice to or permission from you or any third party.

**General Information** refers to information about your use of the Site that is gathered automatically. General Information does not identify you individually, but helps us better understand how the Site is used.

**Our, We or Us** refers to LifeLock, Inc.

**Personal Information** means information, or a combination of pieces of information, that reasonably could allow us to identify you. Personal Information includes things like your name, address, date of birth, social security or driver's license number.

**Third Party Information** refers to information that may be gathered on our behalf or which we lawfully obtain from third parties outside of this Site.

**Tracking Technologies** refers to technologies such as Cookies, JavaScript, Web Beacons (including clear GIFs), E-Tags, Local Storage (HTML5), and Flash Local Storage Object (LSO) cookies.

**Site** refers to this website, [www.lifelock.com](http://www.lifelock.com)

**Services** refers to the services offered by LifeLock through [www.lifelock.com](http://www.lifelock.com) and offline, including our identity protection services, credit monitoring services, mobile applications or other products or services for which you must register or enroll, as well

as any on-line promotions that are associated with our Services, unless we tell you otherwise.

**Web Beacons / Gifs.** We employ (either directly or through one of our third party advertising partners) a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our Site by educating us on what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. To learn more about our advertising company's use of clear gifs, please visit the following sites:

- AOL: <http://adinfo.aol.com/about-our-ads/>
- Conversant Inc.: <http://www.conversantmedia.com/legal/privacy/>
- Yahoo: <https://policies.yahoo.com/us/en/yahoo/privacy/topics/webbeacons/index.htm>
- Criteo: <http://www.criteo.com/privacy/corporate-privacy-policy/>
- YieldMo: [https://admin.yieldmo.com/static/docs/privacy\\_policy.html](https://admin.yieldmo.com/static/docs/privacy_policy.html)

We also use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

**You or Your** refers to you as a Member or User of our Site or Services.