

Privacy Notice for Users in the EEA and UK under the General Data Protection Regulation

[Last Updated: March 22, 2022]

This privacy notice provides more details to the information contained in [Viber's Privacy Policy](#) and applies to users in the [European Economic Area \(EEA\)](#) and the UK ("EU Region Privacy Notice"), in accordance with applicable laws.

This EU Region Privacy Notice provides you with information regarding our processing operations, our lawful basis to process your personal data, categories of third parties we share your personal data with, data transfer outside the European region, data retention, and as required under the General Data Protection Regulation and the UK Data Protection Act 2018 (and as amended by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019) (collectively "GDPR"), as well as information regarding your rights related to your personal data that Viber processes when you use our Services (as detailed under [Viber's Terms of Use](#)).

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Data Controller & Data Protection Officer

Viber Media S.à.r.l., a société à responsabilité limitée incorporated under the laws of the Grand Duchy of Luxembourg, is the controller of your personal data.

You may contact us and our Data Protection Officer, as follows:

- Our online form available at: <https://help.viber.com/en/contact> – please choose the “privacy inquiry” or “GDPR inquiry” categories.
- Using the “contact us” form on the App.
- By Email: DPO@viber.com
- By mail:
Viber Media S.à r.l.,
Attention: Data Privacy Officer
2, rue du Fossé, L-1536
Luxembourg, Grand Duchy of Luxembourg.

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The Data We Collect

The operation and use of our Viber App and Services involves collection of personal data, where the types of such data depend on the type of Service and interaction with us. For example, when you sign up for Viber, you directly provide us personal data. We also automatically collect certain personal data from our users’ device. We explain which information we collect and how we collect it below. The types of personal data collected through use of our Services, including App and website, are listed below. We note that, some types of personal data we collect are required for all Viber Services (for example, your phone number), some types may be required solely for certain Services or features you decide to use (for example, Viber Pay), and some are optional, and subject to your discretion (for example, your photo).

We do not read, listen or store your messages and/ or calls made privately:

We wish to clarify that we do not read or listen to the content of your messages and/or calls made privately via Viber and we do not store those messages (including any media files transferred therein) once they have been delivered to their destination (which on average takes less than one second). If for some reason the message was not delivered to its destination within up to 2 weeks, it will be deleted from our servers. We note that we allow you the option to back up your chat history data on your own external data backup service (like iCloud or Google Drive) – see [HERE](#) for more info on backup.

Data provided or collected through registration & under your Viber account or participation in Viber’s activities:

- **Identifiers**, such as:
 - Your mobile number (including mobile country/network code);
 - Your personal details, (e.g., name, date of birth), if you provided them;
 - Your contact details (e.g., email address), if you provided them;
 - Your account login details, such as your username and any of your password or security pin-code, which you have chosen, if any;
 - Device identifiers, as described below.
- **Your photo**, if you provided it (including any avatar, etc.).
- **Your interests**, if you chose to provide them to us.
- **Your phone address book**, meaning, the names, the phone numbers and the favorites list from your contact lists, if you approved access to them.

Geolocation data:

- **General location**, we use IP addresses we collect and additional information (e.g., phone number area codes), to estimate your general location (e.g., city level).
- **GPS based location**, we will collect the GPS location for very specific purposes (as detailed below), and solely if you gave us permission.

Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offers:

- **Purchased subscriptions, products or services:**
If you purchase credit or subscribe to a Viber Out plan on our App or websites, we will process your billing data (e.g., full name or

your user name, phone number, payment method), as well as transactions-related information (e.g., the purchasing amount; date of purchase, currency; IP address, country, first and last 4 digits of your credit card).

- **Viber Chatbot Payment Transactions:**

Transactions-related details (time and date of purchase, purchase description, purchase amount, currency, the merchant, etc.)

- **Viber Pay Services:**

- Know Your Client (“KYC”) data – including full name, date of birth, country of location, country of issuance of the national ID document, and confirmation of the KYC verification status (i.e., approved or declined);
- Transaction related information – including your digital wallet balance, tokenized version of the credit/debit card of the user, history of payment transactions (including amount, currency, date, who the merchant/recipient was). In addition, if you send or receive payments, we may have access or otherwise store the sender’s or recipient’s account details (e.g., account number);
- Your IBAN and wallet ID;
- Your email address.

Data we collect automatically from your device, e.g., data collected using cookies and other device identifying technologies (‘Cookies and Tracking Technologies’):

- **Device identifiers**, meaning identifiers for devices you have used to access our websites and application, including IP address, unique device identifiers, advertising related identifiers, MAC identifiers.
- **Electronic network activity data**, such as information stored on log files, when you access our Service and website for example, including access time and date stamp, pages viewed, IP address, the pages that directed you to our website, information related to errors and crash reports.
- **Activity data**, relating to your usage of Services, such as connection status, whether you have received and seen messages sent to you, if you are currently on another call and data related to the calls and messages that you send and receive, such as length of the call, who called who, who messaged who, and at what time, your personal preferences related to such usage (for example how often, for how long, what options are selected, etc.). Such activity data may also include:
 - With your permission, we may collect data about links you visit through any of your messages or elsewhere in the App; and with respect to your activity in communities, channels – data about the communities and channels you have visited or follow, messages you have liked, messages you have sent, the content you have viewed;
 - Items you searched and shared via Chat Extensions;

- Offers selected or redeemed.
- **Other device data**, g., data about your device's operating system, your browser, browser or operating system language, your wireless network, your mobile carrier.

For more information regarding how we and our partners use cookies, as well as your choices and controls, please see our [Viber Ads, Cookies and Tracking Technologies' Policy](#).

[Data we collect or receive from other sources and inferred data:](#)

- **Social media data:**
 - If you sign in through third party social media sites like VK – your public profile, including name, relationship status, age, avatar, friends list, accounts you follow or who follow you, your email address, birthday, occupation history, education history, interests, current country, city, and video viewing. Access is ongoing and based on what you already share publicly;
 - Social media data received through your contacts on social media, depending upon your and your contacts' setting on such social media sites.
- **Your contact name**, as saved on other users' devices if they chose to share their contacts with us.
- **Viber may also process inferences about your account and Device identifier**, such as:
 - Inferred gender – for example, inferred from your name;
 - Inferred interests – inferred from the links you visited and your activity in communities and channels – as long as you permitted so;
 - Inferences from third party data and ads-related interactions – we may receive inferred data, linked to your device identifier (mainly, a unique device identifier generated by cookies or other tracking technologies used on our website and Services) from our trusted third-party advertisers and service providers. Such inferred data we receive may include inferences about your interests and characteristics, generated by such third parties from other websites and services you have visited (for example, whether you are interested in fintech, cars etc., which income group you might pertain to, as well as the locations you tend to visit, based on your GPS location). In addition, inferences can be generated from data on how you interact with ads displayed on our App after clicking on them and data about your activity and preferences derived from the clicks on our own ads (and the subsequent installs of our App) associated with your device identifier, delivered on third party's advertising platforms by our trusted third parties. For more information, please see our [Viber Ads, Cookies & Tracking Technologies Policy](#).

[User Submitted Content:](#)

If you choose to participate in Viber's activities (e.g., contests), or as part of your participation in communities/channels/bots' activities available on Viber, you may voluntarily publish, submit or post content such as videos, images, graphics, text, videos, etc., which may include personal data (e.g., an image of a person).

Data we collect from your communications with us, including support, customer services and other inquiries:

If you choose to contact us through any means of communications we make available, you may provide us with certain information such as your contact details (e.g., name, email, phone number, mobile carrier, country – mainly where you are not a user of our Services) and other information you voluntarily wish to provide (mainly, related to the issue you wish us to address or resolve). We will further store our contact history and correspondence with you.

Non users' data:

Mobile phone number and contact name, as saved on a Viber user's phone address book: We may process your mobile phone number even if you are not a Viber user, in the event that your phone number was included in our existing user's address book that has been provided to us (and subject to such user providing us with approval to access the device address book). We will also save the name it was saved under by our user. We do it to show our user who in their contacts is already using our Services and who is not, to allow users find and communicate with their contacts who are users or who are not users in a more efficient way, and solely for as long as a relevant Viber user's account exists on Viber. In the event you will become an active user, the existing users whose phone book included your number, will be notified that you have joined the Service and you will be automatically added to their App's contact list.

If you are not a Viber user and would like to exclude your phone number, please contact us at: <https://help.viber.com/en/contact>.

Business partners data:

When you communicate with us for business purposes as a business partner of ours, we will save your contact data provided by you (names, phone number, email, address etc.), as well as any correspondence we have had. We use trusted third-party providers to manage the maintenance and storage of such data.

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How We Use Your Data & Lawful Basis for Processing Your Personal Data

Under the GDPR, we must have a lawful basis to process your personal data. This may include collection of personal data for the purpose of performing our contract with you (for example, create your Viber account), fulfilling our legitimate interests (for example, collection of data in order to secure our Services), complying with our legal obligations, as well as, where applicable, processing personal data based on your consent (for example, when you voluntarily request to participate in our marketing activities). You can find here information regarding the purposes for which we process the types of personal data listed above, as well as our lawful basis for such processing operations.

In a summary, our lawful basis to process your personal data will be one of the following:

- **Performance of Contract:** We rely on the contractual obligations for the purpose of providing you with the Services in accordance with our [Terms of Use](#), such as, enabling you to register to, log in and/or activate the Services, to back up your data in connection with in-app purchases, or limited financial services if you use these.
- **Legitimate Interest:** We rely on legitimate interest in connection with our marketing campaigns, product development, continued improvement of existing features and provision of certain features, processing a non-user data for the contact list purposes, fraud/spam prevention, and in order to create your Rakuten account. When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected to ensure that the risk to your interests or fundamental rights and freedoms is minimized.
- **Legal Obligation, Compliance and Public Interest:** In some cases, we may also have a legal obligation to process your personal data such as fulfilling your user's rights or may otherwise need your personal data to protect your vital interests or those of another person.
- **Consent:** Where required under applicable law, we will obtain your consent to collect, use or share your data, including for the use of certain cookies on our website (as provided on the [Viber Ads, Cookies & Tracking Technologies Policy](#)). You can withdraw your consent at any time.

The table below further details the lawful basis we rely on in order to process personal data, aligned with the purpose of use. Certain types of personal data might be used for multiple purposes, and accordingly will be processed under different lawful basis.

Please note that, the actual **processing operation** per each purpose of use and lawful basis detailed in the table above, may differ. Such processing operation usually includes set of operations, made by automated means, such as collection, storage, use, disclosure by transmission, erasure or destruction, and may involve transfers of personal data to third party countries as further detailed in the [Data Transfer](#) section below.

Type of Data	Purpose of Use	Lawful Basis for Processing Personal Data
<p>For full explanation, see “The Data We Collect” section above</p> <p>Data provided or collected through registration & under your Viber account:</p> <ul style="list-style-type: none"> ● Identifiers, such as: <ul style="list-style-type: none"> ● Your mobile number; ● Your personal details; ● Your contact details; ● Your account login details; ● Your photo ● Your phone address book 	<p>Authentication & Account Administration</p>	<p>Performance of Contract: Our processing of this data is necessary for performing our contract with you – meaning, to create and administrate your Viber account in order to enable you to use our Services, including:</p> <ul style="list-style-type: none"> ● In order to enable you to register to, log in and/or activate the Services; ● To authenticate and verify your account, as well as to make sure you do not already have a Viber account, we will use your phone number to send verification notice. ● Synchronizing your contact list on the App (e.g., contacts that are Viber users). ● To create your profile, customize your Viber account according to the information you have provided (i.e., name, photo, etc. including where you sign in through your social media account), and display such information as part of your profile when you use Viber Services.
<p>Geolocation:</p> <ul style="list-style-type: none"> ● General location 	-	
<p>Data we collect automatically from your device:</p> <ul style="list-style-type: none"> ● Device identifiers ● Other device data 	-	
<p>Data collected from other sources and inferred data:</p> <ul style="list-style-type: none"> ● Social media data: <ul style="list-style-type: none"> ● If you signed in through third party social media. 	-	

Data provided or collected through registration & under your Viber account:

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;
 - Your contact details;
 - Your account login details;
- **Your photo**
- **Your phone address book**

Geolocation:

- **General location**

Data we collect automatically from your device:

- **Device identifiers**
- **Electronic network activity data**
- **Activity data**
- **Other device data**

Data we collect from other sources and inferred data:

- **Social media data:**
 - If you signed in through third party social media sites – your public profile;

Providing our Services – Communication & Content Features (messaging, voice and video calls, group chats, communities, channels, bots, chat extensions, explore screen, stickers, Viber lenses, etc.), and enabling backups.

Performance of Contract:

Our processing of this data is necessary for performing our contract with you – meaning, to operate, provide and deliver our Services to you and the communication features, including:

- To allow mobile carriers to connect calls to you and from you.
- To show your online status.
- To enable you to send messages, participate in Viber calls, delete messages, etc.
- To provide you with other App's features such as operational notifications (e.g., missed calls).
- We will use your IP address to extract your approximate location, in order to enable you to use certain features that are only available in certain countries (for example, sticker packs).
- Enable you to upload and create backups of your messages on external services.
- Enable you to post and share your User Submitted Content (e.g., images and videos, etc.) on our communities, channels, and bots, where allowed by its administrator, and generally utilize our content features

As stated above, your messages will not be stored by us once they have been delivered.

-
- Social media data received through your contacts on social media, depending upon your and your contacts' setting on such social media sites;
 - Your contact name, as saved on other users' devices if they chose to share their contacts with us.

User Submitted Content

Data provided or collected through registration & under your Viber account:

- **Identifiers:**
 - Your mobile number;
- **Your phone address book**

Data we collect from other sources and inferred data:

- **Your contact name**, as saved on other users' devices if they chose to share their contacts with us.

Data provided or collected through registration & under your Viber account:

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;
 - Your contact details.

Synchronize Your Address Book

Consent:

We will obtain your consent in order to use this data for the purpose of synchronizing your contact list (meaning, in order to show you your contacts on the Viber interface so you contact them through Viber) You have the right to withdraw consent at any time, by changing the App's settings and permissions on your phone, without affecting the lawfulness of processing based on consent before its withdrawal.

Viber Out Credit, Subscription & Other Purchased Services.

Performance of Contract:

We process this data when it is necessary for performing our contract with you, meaning – to enable your use of the Viber Out Credit or purchase of subscriptions on our App or website, including for verification purposes. For example, a log with your purchase will be recorded, and such log will include your IP address or other device identifier.

When you purchase Viber Out Credit or subscriptions on our website, Viber may share certain information with our third-party Payment Service Providers, such as your email address. Your credit card number will be provided by you directly to the applicable Payment Service Provider and Viber will not have access to this data.

Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offer:

- **Purchased subscriptions, products or services:** billing data (e.g., billing address, full name or user name, phone number, account, payment method), transactions-related information (e.g., the purchasing amount date of purchasecurrency; IP address, country, first and last 4 digits of your credit card).

Data we collect automatically from your device:

- **Device identifiers**

Data provided or collected through registration & under your Viber account: **Viber Pay Services**

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;
 - Your contact details;
 - Your account login details.

Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offer:

Performance of Contract:

We process this data when it is necessary for performing our contractwith you, meaning – to enable your use of the Viber Pay services, and for example:

- We must identify you in order to enable you the use of the Viber Pay Services;
- Viber will share certain KYC data you provide with its Payment Service Provider, and they may in turn share with downstream banks, payment service providers, messaging systems, i.e., SWIFT, etc., to enable the payment processing.

Legitimate Interests:

- Know Your Client (“KYC”) data;
- Transaction related information;
- Your IBAN and wallet ID;
- Your email address.

We rely on legitimate interest in connection with the processing of bank account details of recipients to whom you have made a payment transfer, in order to enable you to easily make future transfers to such recipient’s account.

Data we collect automatically from your device:

- **Device identifiers**
- **Activity data:**
 - Offers selected or redeemed.

Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offer:

- **Viber Chatbot Payment Transactions**, meaning transactions-related details including shopping history (time and date of purchase, purchase description, purchase amount, currency, the merchant, etc.).

Viber Chatbot Payments

Performance of Contract:

We process this data when it is necessary for performing our contract with you, meaning – to enable your use of the Viber Chatbot Payments to interact and pay to third party merchants. We will use your data solely for fulfilling our role as an intermediary and we will share with Google Pay or Apple Pay or any other linked payments provider. The confirmation of the payment is provided directly to the merchant and Viber does not receive or share any payment data or registration data from Apple Pay nor Google Pay. Note that, your use of Apple Pay and Google Pay, including their use of your data, is subject to their respective terms and privacy policy which can be found here: [Google Pay](#), [Apple Pay](#).

Data provided or collected through registration & under your Viber account:

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;

Participation in Contests & Marketing Activities

Consent:

We will obtain your consent in order to use this data for the purpose of enabling you to participate in our contests or other marketing activities offered by us from time to time. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Please note that the specific types of the data listed herein that we will process may vary, depending on the contest or activity type. For example, some contests may involve a prize we need to ship to you and for this we will request you to provide your physical address. In addition, some contests or activities are applicable

- Your contact details.

Data we collect automatically from your device:

- **Device identifiers**

Geolocation:

- **General location**

User Submitted Content

Geolocation data:

- **GPS based location**

GPS Location Sharing

Consent:

We will obtain your consent in order to collect and use this data for the purpose of enabling you to share your location with your contacts. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Data provided or collected through registration & under your Viber account:

- **Identifiers**, such as:

- Your mobile number;
- Your personal details;
- Your contact details.

- **Your Interests**

Geolocation data:

- **General location**

Data we collect automatically from your device, e.g., data collected using cookies and other device

Improving and Customizing the Service & Analytics of Viber Activity

Legitimate Interest:

We rely on legitimate interest in connection with our processing of this data for the purpose of improving our services, and for example:

- We use activity data, device identifiers and IP-based location to fix, and evaluate the technical functionality and availability of the Services, as well as for statistical analysis of the usage and functionality, product development, continued improvement of existing features and provision of certain features.
- We further rely on legitimate interest in connection with our processing of this data for the purpose of customizing and personalizing our Services, and for example we use your data provided through registration and inferred data (such as inferred gender or inferences derived from ads-related interactions), interests and IP-based location to customize content we show you, including our customized offers of certain services.

When we advertise our Services to you on third party platforms, we may receive indications of which advertisement led you to join our Service based on unique device identifiers associated with your device, in order, among others, to assess the performance of our campaigns and further to look for similar users. Additional information (including how to opt-out of data collection through the use of cookies) is available on our [Viber Ads, Cookies & Tracking Technologies Policy](#) and under your choices and controls explained in [Your Rights Related to Your Personal Data](#) section below.

solely to specific regions, and for this we will use your general location (for example, according to your phone number area code), to validate your eligibility to participate in a specific contest.

identifying technologies ('Cookies and Tracking Technologies'):

- **Device identifiers**
- **Electronic network activity data**
- **Activity data**
- **Other device data**

Data we collect from other sources and inferred data:

- **Social media data**
- **Your contact name**
- **Inferences about your account and device identifier:**
 - Inferred gender;
 - Inferences from third party data and ads-related interactions.

Data provided or collected through registration & under your Viber account:

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;
 - Your contact details.

Marketing Communications & Location Based Offers

Legitimate Interest:

We rely on legitimate interest in connection with our processing of this data, for example:

- Your email address, name and inferred gender or age range, for the purpose contacting you with marketing and offers relating to products offered by Viber, and our third party trusted partners.
- Your IP address will be used to extract your general location, for the purposes of presenting offers applicable to your region.

- **Your Interests**

[Geolocation data:](#)

- **General location**
- **GPS based location**

[Data we collect automatically from your device:](#)

- **Device identifiers**
- **Electronic network activity data**
- **Activity data**
- **Other device data**

[Data we collect from other sources and inferred data:](#)

- **Social media data**
- **Inferences about your account and Device Identifier:**
 - Inferred gender.

[Data provided or collected through registration & under your Viber account:](#)

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;

Customer Service & Operational Messages

Please note that even after you have chosen to unsubscribe (see how you can do it in [Your Rights Related to Your Personal Data](#) section), we may send you service-related communications, including administrative messages that relate to your use of the Services.

Consent:

We will obtain your consent in order to collect and use GPS location data for the purpose of precise location-based marketing offers and communications. You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Performance of Contract:

We process this data when it is necessary for performing our contract with you, meaning – to communicate with you, give you information about your account, and respond to your requests and inquiries.

Legitimate Interest:

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- Your contact details;
 - Your account login details.

We rely on legitimate interest with our processing of this data for the purpose of improving our customer support (for example in order to train our customer support team, as well as internal management operations).

- **Your phone address book**

Geolocation data:

- **General location**

Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offer.

Data we collect automatically from your device:

- **Device identifiers**
- **Electronic network activity data**
- **Activity data**
- **Other device data**

Data we collect from other sources and inferred data:

- **Social media data:**
 - If you sign in through third party social media sites.

Data we collect from your communications with us, including

support, customer services and other inquiries.

Data provided or collected through registration & under your Viber account:

Safety, Security & Fraud Prevention

- **Identifiers**, such as:
 - Your mobile number;
 - Your personal details;
 - Your contact details;
 - Your account login details.

Legitimate Interest:

We rely on legitimate interest in connection with our processing of data for security purposes such as, authentication, identity verification and fraud and spam prevention. This may include URLs included in messages and messages, which were reported as SPAM by other users, or were otherwise suspected to be unsolicited and using your operating system authentication services. We may use automated decisions to close an account based on such data and other logic we have created for this, in order to protect other users and prevent recurring breaches.

Geolocation data

Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offers:

- **Purchased subscriptions, products or services:** transactions-related information (e.g., the purchasing amount).
- **Viber Pay Services:** Know Your Client (“KYC”) data; transaction related information.

Data we collect automatically from your device:

- **Device identifiers**
- **Electronic network activity data**

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- **Activity data**

- **Other device data**

Data provided or collected through registration & under your Viber account:

- **Your interests**

Geolocation data:

- **General location**
- **GPS based location**

Data we collect automatically from your device:

- **Device identifiers**
- **Activity data**
- **Other device data**

Data we collect from other sources and inferred data:

- **Social media data**
- **Inferences about your account and Device identifier**

Business partners data

Advertising

Legitimate Interest:

We rely on legitimate interest in connection with our processing of this data to provide our advertising services (meaning, to enable the display of advertisements, provided by third party advertisers, in our App and Services), to measure and optimize the performance of ads and deliver more relevant ads, provided however, that for such purpose we will not share your data with advertisers or other third parties.

Consent:

We obtain your consent in order to use and share certain data, such as device data and identifiers, age range, inferred gender with third party advertising partners for the purpose of personalized advertisements. Additional information (including how to opt-out of data collection through the use of cookies) is available on our [Viber Ads, Cookies & Tracking Technologies Policy](#).

In addition, we will obtain your consent in order to collect and use data about links you visit and data about the communities and channels you have visited or follow, messages you have liked, messages you have sent, the content you have viewed, for the purpose of personalized advertising.

You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

B2B Communications and Engagements Legitimate Interest:

We rely on legitimate interest in connection with our processing of this data, including for direct marketing purposes – meaning, we will store your email address and use it to send you our marketing offers. You have the ability to opt out of our direct marketing emails at any time.

		<p>Performance of Contract:</p> <p>Our processing of this data might be also necessary for performing our contract with you (depending on our engagement).</p>
<p>Non-User Data</p>	<p>Provide Service to Existing Users</p>	<p>Legitimate Interest:</p> <p>We rely on legitimate interest in connection with the processing of non-Viber users' phone number (and names under which they were saved by Viber users) in the event such contact was included in our user's address book that has been provided to us, and for the purpose of showing our user who in their contacts is already using our Services and who is not, to allow the user find and communicate with their contacts who are users in a more efficient way. If you are not a Viber user and would like to be excluded from such processing, please contact us at https://help.viber.com/en/contact.</p>
<p>May include all types of data Viber stores, depending on the circumstances, as detailed under The Data We Collect section above.</p>	<p>Defend our Rights & Enforce our Policies</p>	<p>Legitimate Interest:</p> <p>We rely on legitimate interest in connection with our processing, use and sharing of data for the purpose of defending our rights and enforcing our policies, terms and agreements, for example, in the event of a dispute, claims and legal proceedings, and solely to the extent necessary for such purpose. For example – we may record and log some of your actions, such as acceptance of our terms and policies, acceptance of certain offers, etc.</p>
<p>May include all types of data Viber stores, depending on the circumstances, as detailed under The Data We Collect section above.</p>	<p>Compliance with Legal Obligations & Public Interests</p>	<p>Compliance with a legal obligation;</p> <p>We use your data where it is necessary to comply with legal obligations to which we are subject to and cooperation with regulators and law enforcement bodies – where there is a valid legal request such as binding order.</p> <p>Please see below examples of EU laws and Luxembourg laws that apply to Viber and according to which we may process, use, maintain or store your data:</p> <ul style="list-style-type: none"> • Data Protection Legislation: We will process your personal data upon your request to exercise your rights under the GDPR. We will store an indication of your access request and order to be able to demonstrate compliance. • Corporate and Tax Legislation: We may be required to provide regulators with information under applicable corporate and tax legislations. • Consumer Protection Legislation: We will process your personal data in accordance with local laws enacted under Directive EU 2019/770 on certain aspects concerning contracts for the supply of digital content and digital services. • Telecommunications: We will process telecommunication data in accordance with local laws enacted under the Eprivacy Directive and under the future e-Privacy Regulation. • Criminal Investigations and Legislation: We may be required to provide authorities with information in compliance with criminal investigations laws applicable to electronic communications provider or otherwise applicable to us.

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- **Civil Proceedings:** We may be required to provide authorities with information in compliance with regulation (EU) No 1215/2012 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters and Council Regulation (EC) No 1206/2001 of 28 May 2001 on cooperation between the courts of the Member States in the taking of evidence in civil or commercial matters.

Protection of vital interests:

We may process your data in very limited and rare circumstances, where we find it necessary and essential for the purpose of protecting your or third party's life safety and security as well as humanitarian purposes.

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Data Sharing – Categories of Recipients We Share Personal Data With

We share data with third parties, including our corporate family and with trusted companies that help us provide our Services in compliance with strict data security and privacy practices, as well as other third parties such as our advertising partners and third parties offering services through our App. We may also share personal data in limited circumstances where we are required to do so under applicable law. You can find here information about the categories of such third-party recipients, what other Viber users can see, as well as the purpose for which the personal data is shared with such third parties.

Categories of Recipients	Additional Information
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The Viber Corporate Family	<p>We may share the data we collect about you with the Viber corporate family, including our parent company, Rakuten Group Inc., and its and our affiliates (as listed HERE), and subsidiaries, for the following purposes:</p> <ul style="list-style-type: none">• Certain types of data, such as name, email, photo, phone numbers and Viber unique ID, may be disclosed in order to provide joint content and our Services (e.g., registration, coordination of membership accounts between the Viber corporate family, transactions, analytics and customer support).• Additionally, we may share certain types of data about you as may be necessary to help detect and prevent potentially illegal acts, violations of Viber policies, fraud and/or data security breaches.• We share data with Viber's subsidiaries due to our global operations, as we have teams and offices located worldwide, and each such subsidiary may operate the services or other functions (such as development, etc.) for a certain region.
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- Further, we share data with our affiliated company, Rakuten Marketing LLC, as our service provider for our marketing and advertising activities.

For users registering to Viber from November 20, 2019 – details provided during your registration will be shared with Rakuten group to create the Rakuten account and/or to link your Rakuten account with your Viber account. Your Rakuten account or any activity related to your use of Rakuten services is governed by [Rakuten ID Privacy Policy](#).

Our Service Providers

We share your personal data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions. This includes the following categories of service providers:

- **Advertising and marketing service providers**, who help us with advertising measurements and app installations;
- **Data storage providers**, with whom we entrust the hosting and storage of our data;
- **Customer support providers**, who help us perform such functions as customer support and customer service;
- **Data analytics and data management providers**, who help us improve, personalize and enhance our Services;
- **Measurement partners**, who help us with measurements, tracking and targeting;
- **Payment and fintech services providers**, who enable processing payments and fintech actions on our app;
- **Data security partners**, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations.

Where we share information with services providers and partners, we ensure they only have access to such information that is strictly necessary in order for us to provide the Services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only, while ensuring compliance with all applicable data protection regulations (such service providers may use other non-personal data for their own benefit).

Third-Parties Offering Service Through our App

As part of Viber’s Services, we allow third parties to create communities and channels on Viber, and develop through the use of Viber’s API their own bots, chat extensions and integrate into Viber explore screen in order to connect with

Viber users (“**Third Party Communications**”).

In the event you voluntarily choose to interact with the Third-Party Communications through your use of the Services, such third parties may receive certain data about you, such as your user’s name, photo, country, some device data and Viber unique ID. These third parties are not processing the data on our behalf and are considered “independent

controllers” of such data for the purposes of the GDPR, meaning, their use of your data shall be subject to their policies and privacy practices.

Advertising Partners

To enable the limited advertisements on our Services, we may share data with our third-party advertising partners, and advertising service providers. This includes partners managing our advertising placements (Rakuten included) and also advertisers themselves and their agencies or third parties managing their advertising demands. The list of our advertising partners is available [HERE](#)

We will share with such advertising partners a unique device identifier (i.e., an advertising identifier associated with your device) along with age range, inferred gender, country, city, reduced IP address (or GPS location data if you allowed us in your settings) and certain technical or aggregated data (e.g., your language preference).

Your unique advertising identifier is created by your mobile device’s operating system and you can change it or choose not to share it at any time. If you want to know more, read our [Viber Ads, Cookies & Tracking Technologies Policy](#).

Legal and Law Enforcement

We may disclose certain data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to terror acts, criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other Viber user to legal liability, and solely to the extent necessary to comply with such purpose.

This disclosure is subject to our strict data security and privacy practices and without compromising our end-to-end encryption. It may include, depending on the circumstances, certain types of your Activity Data, Identifiers and phone address book.

Corporate Transactions

In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale) we will share the data we store with our acquiring company.

We will obligate the acquiring company to assume the rights and obligations as described in our Privacy Policy (including this notice), and we will notify you of such corporate changes in your data processing.

Limited Payment Services

If you use our Viber Pay services, we will share with our third-party payment processor KYC related data such as your name, date of birth, contact details, country, etc.

If you use our Viber Chatbot Payment, we will share with Google Pay or Apple Pay or any other linked payments provider the following information: (i) name of the payment service provider merchant; (ii) price of the items purchased and currency; and (iii) the description of the items purchased. The confirmation of the payment is

provided directly to the merchant and Viber does not receive or share any payment data or registration data from Apple Pay nor Google Pay. Note that, your use of Apple Pay and Google Pay, including their use of your data, is subject to their respective terms and privacy policy which can be found here: [Google Pay](#), [Apple Pay](#).

If you use our Viber Out Credit and subscriptions, we will share your email address with our payment processor, for the purpose of verification and fraud detection.

Other Users

When you use our Services, other users can see certain data about you:

- Unless you have changed your settings:
 - your user name and photo;
 - your phone number (if you are in communication with them);
 - your connection status;
 - whether you have received and seen messages sent to you.
- If you are currently on another call.
- If they are part of the call with you, data related to the calls and messages you have sent and received such as length of the call, who called who, who messaged who, and at what time, the type of call (audio/video) and whether you answered the call on your primary or another device.
- For disappearing messages, we will notify the other users of any screenshots you've taken (so please respect the vibe and do not take them).
- When you join Viber, the contacts in your address book that are already Viber members may be informed that you're now on Viber too.
- A reminder about your birthday on the date of your birthday.
- When you join Viber Pay, the contacts in your address book that are already Viber members may be informed that you're now using Viber Pay. In addition, Viber users will see an indication whether you are a Viber Pay user.

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- **Your public posts:** If you post information on our public spaces such as communities or channels, it may be searchable and available to anyone on Viber. You can always delete your posts on those public spaces, but Viber cannot control and is not responsible for what other users do with this information (e.g., store on their devices, publish on Viber or outside of it etc.), thus, we recommend you do not disclose your personal data through the content of your posts.

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Data Transfer

Due to our global operations, your personal data will be shared with Viber corporate family, as well as our service providers and business partners around the world including outside the EEA and UK. We take measures to ensure the transfer of such data will provide sufficient safeguards, as required under the GDPR. These measures include compliance with Binding Corporate Rules of the Rakuten Group, as well as contractual commitments of our partners and service providers. We further explain below why we transfer personal data, the measures we take to ensure your personal data will be secure upon transfer, and your rights in this regard.

Due to our global nature and operation, your personal data may need to be processed in countries that may not offer the same level of protection as in your home country. When personal data collected within the EEA and the UK is transferred outside these locations, we will take the steps necessary to ensure that the transfer of such data provides sufficient safeguards, as required under the GDPR.

- We store and process all categories of your personal data on our computers and servers. Your data will be stored in our servers located in the US, however note that, our communications servers are located globally in order to enable the operation of our communications services.
- As part of the Rakuten Group, the transfer of your personal data to entities which are a part of our Viber corporate family (whether located in the EEA and UK or not), are made in accordance with the Rakuten Group Binding Corporate Rules to legitimize international data transfers within the Group. The Rakuten Group Binding Corporate Rules can be found at <https://corp.rakuten.co.jp/privacy/en/bcr.html>
- Some of our service providers and business partners are located in various locations, including outside of the EU, EEA or UK. In such events, transfers of your personal data will be made in accordance with applicable data protection laws, and as specifically, without derogating from the above, all transfers of personal data outside the EU, EEA or UK are also subject to the provisions of the Standard Contractual Clauses (known as “SCC”) approved by the European Commission (and the equivalent for the UK, where

applicable) available [HERE](#). Where SCC is not sufficient, we ensure supplementary measures are placed, such as encryption in transfer and at rest.

You may exercise your rights, where applicable, to receive information on such transfer mechanisms detailed above, by contacting us through our **online form available at: <https://help.viber.com/en/contact>** (please choose the “privacy inquiry” or “GDPR inquiry” categories), or through additional means of communications we have provided under this notice.

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Data Retention

As we have explained above, we process personal data for various purposes. Accordingly, we only keep personal data as long as required to fulfill the purpose for which the data was collected, or, in some instance, where we have other necessities to retain the personal data, for example, where required by law. We explain below the criteria used by us to determine the retention of your personal data (meaning, for how long we store it and when we delete it, aligned with the type of data and purpose of collection).

The criteria used by us to determine Viber’s retention periods are as follows:

- **The type of personal data and purpose of collection** – unless otherwise specified, we retain data as long as it is necessary and relevant for us to achieve the purposes for which the personal data was collected. For example:
 - Personal data required to be retained in order to maintain your Viber account and to enable you the use of Viber Services – these types of data, including your mobile number, and phone address book, will be retained for as long as you maintain your Viber account.
 - Personal data you have voluntarily provided during registration or through your account – these types of data, including your photo, date of birth, email address and interests, will be retained for as long as you maintain your Viber account.
 - The details of your communication with our customer support team will be stored for 10 years.
 - Call Detail Records (CDRs) of your calls and messaging activity are kept as a raw data for 24 months from creation. CDRs may include, for example, you phone number and device identifiers (i.e., IP address, unique device identifier).
 - We delete any message once delivered, or after 14 days if delivery attempts throughout this period was not successful.

If you decide to delete your Viber account, the CDRs and communications with our customer support will be retained as detailed above, and we will further retain records of purchases you have made (using Viber Pay, purchasing subscriptions, etc.), for the periods required under applicable laws, or as needed in accordance with our fraud monitoring program.

All other types of data related to your Viber account will be deleted, unless we are required to further retain the data, subject to the criteria detailed below. We may keep activity data on a non-identifiable basis to improve our Services. Your posts on channels and communities may remain available if you do not delete them. Please note that deletion of the App (i.e., uninstall the App from your device) will not delete your account. Please see information and instruction regarding your account deletion [HERE](#).

- **Compliance with our legal obligations** – we are required to retain certain types of data in order to comply with our obligations under applicable laws. For example, we need to retain transactions information to comply with tax legislation. In addition, we may retain certain types of personal data in the event we are required to do so subject to a binding legal request or a court order. Further, subject to EU Directive 2002/58/EC we are required to retain certain personal data (such as phone number) to convey messages and calls.
- **Dispute, claims and legal proceedings** – if you have a dispute with us, we may retain certain types of personal data as necessary and applicable to your claims, including any legal proceedings between us, until such dispute was resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods. In addition, in the event you request to exercise your rights, we will maintain the applicable correspondence for as long as needed to demonstrate compliance, and usually in accordance with applicable statutory limitation periods.
- **Retention for Non-users' data** – If you are not a Viber user, and we process your data to enable Viber users to communicate with you via Viber Services, we will retain such data as long as it is relevant to Viber users, or until you have requested us to stop processing your phone number. You can request to exclude your phone number (by contacting us at: <https://help.viber.com/en/contact>). Furthermore, if one of our users used our Viber Out Services in order to communicate with you (i.e., call you through Viber), we will retain a log of such call (Call Detail Records – CDR – as detailed above), which will include your phone number, for 24 months from creation.

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[Your Rights Related to Your Personal Data](#)

Under the GDPR, you have certain rights regarding the personal data that Viber has collected about you. Such rights may include (depending on the type of data and our lawful basis for processing) the right to know which types of data we collect and why we collect it (as we detail under this notice), the right to request rectification of your personal data, the right to request us to delete your personal data, the right to restrict processing of personal data, the right to data portability, the right to access your personal data, the right to object to the processing of certain forms of data, the right to appeal automated decisions and profiling, the right to withdraw your consent at any time, as well as the right to lodge a complaint to a supervisory authority. We further explain below the operational meaning of each such right, as well as when and how you may exercise your right.

The Right to Be Informed

This EU Region Privacy Notice and [Viber's Privacy Policy](#) describes our practices in detail using simple language. Everything you need to know is here. If you have more questions, feel free to contact our [support team](#).

The Right to Rectification

If you believe we have the wrong data about you, or that your data is incomplete, feel free to change it at any time through the profile settings on your Viber settings on your mobile device. If you can't find what you are looking for, [contact us](#).

The Right to Erasure

We have made it easy for you to delete your historical data on the App, while continuing to use the App. Simply tap on the [delete your data](#) button in your privacy settings. We will delete the data which we are not otherwise required to keep or is necessary for the provision of the Service. And no need to worry – deleting your data won't remove the chats on your Viber App on your phone.

Note that when you deactivate the Viber account your data and chats are automatically deleted from your devices.

The Right to Restrict Processing

We allow you to opt out of certain processing of your data by using the [Viber privacy settings](#) on your mobile device. You can decide which processing operations you want to opt-out of. You can also change the settings on your mobile device operating system at any time to prevent us gaining access to certain data such as your accurate location – but this may negatively impact on your user experience.

The Right to Data Portability

We have created a [request your data button](#) in Viber's privacy settings on your mobile device to make a simple way for you to access the data connected to your account. Once it is ready, you will receive a file from Viber containing this data.

The Right of Access

You may access your data by using the [request your data button](#) in Viber's privacy settings on your mobile device. If you have further questions [contact us](#).

The Right to Object

You can object to the processing of certain forms of data by contacting our support. Complete this [online form](#) and explain your special circumstances. If you receive emails from us, you can always opt out on the bottom of the email, or by contacting our support. We also allow you to opt out of certain processing of your data by using the [Viber privacy settings](#) on your mobile device.

The Right to Appeal Automated Decisions and Profiling

We may make an automated decision to block a user, in case we suspect this user is using our services for illegal acts or acts that violate our terms of use. If you believe that your account was unlawfully blocked, you can contact our [support team](#).

The Right to Withdraw Consent

Where we have collected or other process your personal data based on your consent, at any time, you have the right withdraw your consent.

If you would like to further understand or exercise your rights, please contact us by:

- Our online form available at: <https://help.viber.com/en/contact> – please choose the “privacy inquiry” or “GDPR inquiry” categories.
- Using the “contact us” form on the App.
- Email: DPO@viber.com

- **By mail:**
Viber Media S.à r.l.,
Attention: Data Privacy Officer
2, rue du Fossé, L-1536
Luxembourg, Grand Duchy of Luxembourg.

We will contact you if we need additional information from you in order to honor your requests.

You have the right to submit a complaint with our lead supervisory authority or any other competent data protection supervisory authority. Our lead supervisory authority is the National Commission for Data Protection – Grand-Duchy of Luxembourg.

In addition to the above, Viber provides you with certain choices and controls you may exercise, related to your personal data, as follows:

- We enable you to delete or edit your messages anytime, even after they have been sent (they will be deleted or appear edited for you, your friend and our Services).
- You can also control your privacy settings within the App to change the visibility of your online status.
- You can disable the “seen” notification so that other users do not know whether you’ve read a message yet.
- You can choose not to share your photo and/or birthday or not to allow other users to look you up by name, which are available within the App.
- You can also make additional choices on your phone’s settings by changing our App’s permissions such as GPS location sharing, access to contact list and more.
- If you do not wish to receive Viber marketing notifications, you may adjust your system settings to decline notifications from Viber, or submit a request to our support. And if you subscribed to receive promotional emails from Viber, you can unsubscribe in any such email at any time.
- Sending a message to a bot, subscribing to a bot will allow admins of that bot to send you notifications and personal messages. If you do not wish to receive such notifications, you may adjust your account settings to decline them or opt-out at any time from receiving further notifications.
- You can choose to allow or to not allow customization and personalization of our Services provided to you based on your personal data, by changing your personal data toggles in the privacy setting within the App.

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Changes to this EU Region Privacy Notice

We may make changes to this EU Region Privacy Notice from time to time. If we do (except for minor tweaks), we will notify you via our App and website.

We may modify or update this privacy notice from time to time.

If we change this privacy notice (except for technical tweaks), we will notify you of the changes. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g., to object to the processing). The last modification date of this privacy policy will be reflected in the “Last Updated” header above.

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Current Privacy Notice for EEA and UK users under the GDPR PDF Version [Viber GDPR Privacy Notice March 2022](#)

Previous GDPR Privacy Rights PDF Version [GDPR Privacy Rights November 2019](#)