# Viber Privacy Policy

### [Last Updated: March 22, 2022 - What changed?]

As part of our mission to spread good vibes, we want you to be able to share the things that matter to you most with your friends, family and anyone else around you. It's important to us that you feel comfortable and trust us with your data when using the Viber Services (as detailed under <u>Viber's Terms of Service</u>). Please take a few minutes to read this Privacy Policy, so that you understand what data we collect, what we do with it and why, how we protect it and what are your rights in relation to this data.

In general, we collect data that allows us to provide you with an optimal experience while using our Services. This includes, for example, some basic benefits like allowing other users to see the name and picture you choose to show and the more advanced ones, like processing your registration and financial data to allow you to purchase our paid solutions, if you choose to use them. It also helps us to keep our Services clear of fraud and spam, and it allows us to get a unique understanding of what additional services may be useful to you, in addition to other purposes outlined in this Privacy Policy.

Starting with Viber 6.0, Viber's core features are secured with end-to-end encryption: Viber one-on-one calls, one-on-one messages, group messages, private media sharing and linked devices. This means that the encryption keys are stored only on your devices and no one, not even Viber itself, has access to them. To learn more about Viber Encryption, follow this link: <a href="http://www.viber.com/en/security">http://www.viber.com/en/security</a>.

If you are located in the <u>European Economic Area (EEA)</u> or the UK, or you are a California resident and the General Data Protection Regulation ("GDPR") or California Privacy Protection Act ("CCPA") applies to you, as applicable, additional information that supplements this Privacy Policy is available at: <u>EU Region Privacy Notice</u>; <u>CCPA Notice</u>.

# **TABLE OF CONTENTS**

- The Data We Collect
- How We Use Your Data
- What Other Users Can See
- How We Share Your Personal Data
- International Data Transfers
- Data Retention
- Your Choices and Controls
- Your Rights Related to Your Personal Data
- Data Security and Storage
- Third-Party Websites, Apps and Back-Ups
- Children's Privacy
- Changes to this Privacy Policy
- Contact Us

# 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;
  - o 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;
- Where required under applicable law (depending on your jurisdiction), we may also collect your tax ID.

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:
  - We may collect data about links you visit through any of your messages; and with respect to your activity in communities and 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, e.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:
  - o 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 <a href="https://vb.me/ContactUs">https://vb.me/ContactUs</a>.

# 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.

# Back to top

# How We Use Your Data

At Viber, we use your personal data to provide you with the best possible Service. This includes administering your account, customizing and improving the Service we offer, processing payments, serving ads and marketing campaigns, providing you with support and

for compliance and safety reasons. We explain below the purposes for which we collect and use your personal data, as well as the types of data we use for each purpose.

You can find here information regarding the purposes for which we collect and use your personal data.

If you use our Services from the EEA or the UK, we must have a lawful basis to process your personal data. Please review our **EU Region Privacy Notice** for detailed information.

#### **Authentication and Account Administration:**

Viber uses different types of your personal data to create and administrate your Viber account in order to enable you to register, log in, activate and use the Services. This includes, for example:

- To authenticate and verify your account, as well as to make sure you do not already have a Viber account;
- To synchronize your contact list on the App (meaning, in order to show you your contacts on the Viber interface so you contact them through Viber);
- 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.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers, your photo and phone address book;
- General location;
- Data we collect automatically from your device, such as device identifiers and other device data;
- Data collected from other sources such as social media data and your contact name, as saved on other users' device.

Provide 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:

Viber uses different types of personal data in order to operate, provide and deliver to you our Services, including communication features. This includes, for example:

- 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;
- Send you operational related and service-related communications, including administrative messages that relate to your use of the Services;
- Subject to the permission you provide, enabling you to share your location with your contacts.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers, your phone address book;
- Geolocation data;
- Data we collect automatically from your device, such as device identifiers, electronic network activity data, activity data and other device data;
- Data we collect from other sources, such as social media data;
- User Submitted Content.

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

# Enabling Your Use of Viber Purchased Services (Viber Out Credit & Subscriptions) and Viber Chatbot Payments:

Viber uses different types of personal data in order to enable your use of the Viber Out Credit or purchase of subscriptions on our App or website, including for verification purposes. This includes, for example, sharing your email address with our third-party Payment Service Providers, to enable the processing of your payments. 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. We will further store a log that will record your purchase for operational and fraud detection purposes, and such log will include your IP address or other device identifier.

We also use certain types of data to enable you to interact and pay to third party merchants through your use of the Viber Chatbot Payments. This data will be used 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.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers:
- Financial information, such as:
  - for 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 purchase currency; IP address, country, first and last 4 digits of your credit card);
  - for Viber Chatbot payment, transactions-related details including shopping history (time and date of purchase, purchase description, purchase amount, currency, the merchant, etc.).

# **Enabling Your Use of Viber Pay Services:**

As part of the Viber Pay service, Viber provides limited financial services via a licensed partner. In order to provide this, we use certain information and share it with the licensed partner. This includes, for example:

- Identify you in order to enable you the use of the Viber Pay Services;
- Share certain KYC data you provide with the Payment Service Provider, the Payment Service Provider may in turn may in turn share this with downstream banks, payment service providers, messaging systems, i.e., SWIFT, etc., to enable the payment processing. Viber will not share information more than is strictly necessary;
- Enabling you to easily make future transfers to a beneficiary's bank account, to which you have previously made a payment transfer.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers;
- Financial information, such as Know Your Client ("**KYC**") data, transaction related information, your IBAN and wallet ID, your email address and bank account details of recipients to whom you have made a payment transfer;
- Data we collect automatically from your device, such as device identifiers.

# **Enabling and Managing Your Participation in Contests & Marketing Activities:**

If you voluntarily choose to participate in contest and other marketing activities offered by Viber, we will use different types of personal data, depending on the applicable activity, in order to enable your participation and operate such activities. This includes, for example:

• If you participate in a contest which involves a prize, we will request you to provide your physical address in order to ship it to you;

As some contests or activities are applicable solely to specific regions, 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.

The types of data we will use for such purpose will mainly include (as detailed in the "Data We Collect" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers;
- Data we collect automatically from your device;
- General location;
- User Submitted Content.

### Improving and Customizing the Service and Analytics of Viber Activity:

Viber uses different types of personal data in order to improve, enhance and evaluate the Services, as well as customize the Services. This may include, for example:

- We use activity data, and device identifiers 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 use your data provided through registration and inferred data (such as inferred gender, and inferences from ads related interactions), interests and general location to customize content we show you, including customized our offers of certain services;
- When we advertise our Services to you on third party platforms, we might 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, to look for similar users, for better ad
  measurements, as well as to learn more about your activity and preferences on our
  Services.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> We Collect" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers and your interests;
- General location;
- Data we collect automatically from your device, e.g., data collected using cookies and other device identifying technologies, such as device identifiers, electronic network activity data, activity data and other device data;
- Data we collect from other sources and inferred data, such as social media data, your contact name and inferences about your account and device identifiers.

Marketing Communications with Viber's Users & Location based Offers:

Viber uses different types of personal data in order to contact you with marketing and offers relating to products offered by the Viber Services, and our third party trusted partners, in line with applicable laws. This may include, for example:

- We will use 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;
- Subject to the permissions you have provided, we will use you GPS location data for the purpose of providing you with location-based marketing offers and communications.

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

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers and your Interests;
- Geolocation data;
- Data we collect automatically from your device, such as device identifiers, electronic network activity data, activity data and other device data;
- Data we collect from other sources and inferred data, such as social media data and inferences about your account and device identifier.

# **Advertising:**

Viber uses different types of personal data in order to provide our advertising services (meaning, to enable the display of advertisements, including personalized advertisements provided by third party advertisers, in our App and Services), to measure and optimize the performance of ads and deliver more relevant ads. This may include, for example:

- Viber may share your device identifier (mainly, a unique device identifier generated by cookies or other tracking technologies used on our website and Services), as well as age range, inferred gender, and reduced IP address (or GPS location data if you allowed us in your settings) with third party advertising partners for the purpose of presenting you with personalized ads;
- Viber may collect and use data about links you visit through any of your messages and data about the communities and channels you have visited or follow, messages you have liked, messages you have sent and the content you have viewed, for the purpose of personalized advertising.

Additional information (including how to opt-out of data collection through the use of cookies) is available on our <u>Viber Ads, Cookies & Tracking Technologies Policy</u>.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as your interests;
- Geolocation data;
- Data we collect automatically from your device, such as device identifiers, activity data, and other device data;
- Data we collect from other sources and inferred data, such as social media data and inferences about your account and device identifier.

#### **Customer Service:**

Viber uses different types of personal data in order to provide customer service and customer support. This may include, for example:

- We will use your contact details to communicate with you, give you information about your account, and respond to your requests;
- We may use your contact history and correspondence with us for the purpose of improving our Services, training our support team as well as internal management operation.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers and your phone address book;
- Geolocation data;
- 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, such as device identifiers, electronic network activity data, activity data and other device data;
- Data we collect from other sources and inferred data, such as social media data;
- Data we collect from your communications with us, including support, customer services and other inquiries.

### Safety, Security & Fraud Prevention:

Viber uses different types of personal data for security purposes such as fraud and spam prevention. This may include, for example:

- We will collect and examine URLs included in messages or messages, which were reported by other users, or were otherwise suspected to be unsolicited and using your device 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. If your account has been blocked, you can contact our support.

The types of data we will use for such purpose will mainly include (as detailed in the "<u>Data</u> <u>We Collect</u>" section above):

- Data provided or collected through registration & under your Viber account, such as Identifiers;
- Geolocation data;
- Financial information provided or collected through your use of our limited financial services (e.g., payment solutions), or purchased subscription and offers;
- Data we collect automatically from your device, such as device identifiers, electronic network activity data, activity data and other device data.

# **B2B Communications and Engagements:**

We will use Business Partners Data (as detailed in the "<u>Data We Collect</u>" section above) for the purpose of communicating with you, or as otherwise needed to facilitate our engagement, as well as to send you our marketing offers. You have the ability to opt out of our direct marketing emails at any time (see how you can do it in "<u>Your Choices</u>" section).

### **Provide Service to Existing Users:**

We will store and use Non-User Data (as detailed in the "Data We Collect" section above) which includes 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 <a href="https://vb.me/ContactUs">https://vb.me/ContactUs</a>

# Defend our Rights, Enforce our Policies & Compliance with Legal Obligations and Public Interests:

Viber may use and share different types of personal data, and depending on the circumstances, for the purpose of defending our rights and enforcing our polices, terms and agreements, 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), as well as 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. This may include, for example:

- In the event of a dispute, claims and legal proceedings, and solely to the extent necessary for such purpose;
- We may record and log some of your actions, such as acceptance of our terms and polices, acceptance of certain offers, etc.;
- We will store an indication of your request to exercise your rights related to your personal data in order to be able to demonstrate compliance;
- We may store telecommunication data in accordance with local laws;

 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.

#### Back to top

# What Other Users Can See

When you use our Services, other Viber users can see certain data about you, for example, the fact that you are a Viber user or a user of certain Viber Services, the content you voluntarily share, your profile information (subject to your settings), your connection status, etc., as we detail and explain below.

Other users can see on Viber the following data about you:

- Unless you have changed your settings:
  - your user name and photo;
  - o 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.
- If your "Use Peer-to-Peer" option is on, other users can use technical tools to see your IP address. You can turn this option off at any time on your privacy settings.
- 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.

Back to top

# How We Share Your Personal Data

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, as well as the purpose for which the personal data is shared with such third parties.

Your data is kept safe with us, but we do share your personal data with third parties we trust, solely as follows:

# The Viber Corporate Family:

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 <u>HERE</u>) and our subsidiaries, for the following purposes:

- Certain types of data, such as name, personal email, avatar, phone numbers, 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;
- 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. In addition, the same will apply to users in Japan, who decided to link their email to their Viber account. Your Rakuten account or any activity related to your use of Rakuten services is governed by <u>Rakuten ID Privacy Policy.</u>

#### **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 types 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 analyze, 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 preagreed 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 communicate 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 the user, 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, 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 device identifiers (i.e., an advertising identifier associated with your device) with our third-party advertising partners (listed HERE), along with certain of your device data (e.g. language preference), 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 about you and the device you are using. This includes partners managing our advertising placements (Rakuten included) and also advertisers themselves and their agencies or third parties managing their advertising demands. 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:**

Subject to our strict data security and privacy practices and without compromising our end-to-end encryption, we may disclose certain types of your data, including, and depending on the circumstances, Activity Data, Identifiers and your phone address book, 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 needed to comply with such purpose.

#### **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 this 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.

#### Back to top



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. We take measures to ensure the transfer of such data will provide sufficient safeguards. 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, your personal data may need to be processed in countries where data protection and privacy regulations may not offer the same level of protection as in your home country. Depending on the territory from which you use our Services, we may store and process all categories of your personal data on our computers located globally, including in the United States, Asia, Europe, Russia, Australia and Brazil. In addition, our communications servers are located globally in order to enable the operation of our

communications services and we use service providers that may be located in various locations.

Transfers of your personal data will be made in accordance with applicable data protection laws, and among others, we have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal data is adequately protected.

Furthermore, as part of the Rakuten Group, Viber relies on the Rakuten Group Binding Corporate Rules to legitimize international data transfers within the Group. The Rakuten Group Binding Corporate Rules can be found at <a href="https://corp.rakuten.co.jp/privacy/en/bcr.html">https://corp.rakuten.co.jp/privacy/en/bcr.html</a>.

When personal data collected within the EEA is transferred outside the EEA, we will take the steps necessary to ensure that the transfer of such data provides sufficient safeguards, and you may exercise your rights, where applicable, to receive information on such transfer mechanism, as further detailed under our <u>EU Region Privacy Notice</u>.

# Back to top



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, your 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: <a href="https://vb.me/ContactUs">https://vb.me/ContactUs</a>). 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.

# Back to top

# Your Choices & Controls

The personal data is yours – the choice is yours too on how to customize your Viber experience. Viber users enjoy certain choices and controls related to their personal data. We explain below the controls and choices provided by Viber and how you may exercise them, including deletion of messages, privacy settings, the visibility of your online status,

limit what other users can see, unsubscribe from marketing materials and opt-out of certain personalization features.

Viber provides you with certain choice 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 may also adjust your phone
  preferences to disable the use of your GPS location data at any time.
- 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.

### Back to top

# Your Rights Related to Your Personal Data

Subject to local law, you may have certain rights regarding the personal data that Viber has collected about you. Such rights may include (depending on your jurisdiction as well as the type of data and the purpose for which the data was collected or retained) 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 opt-out of certain data collection, the right to access your personal data, the right to withdraw your consent, 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.

Viber respects your ability to exercise certain rights with regards to your personal data collected and stored. In some areas and jurisdictions, such principal rights may include all or some of the following rights:

- The right to be provided with information about our data collection and privacy practices including the sources from which we collect data, the purposes for which we collect and share data, the data we hold. This 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 access your personal data you may exercise your access right 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 request rectification the personal data we hold about you if you believe we have the wrong data about you, or that your data is incomplete, feel free to change your personal data 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 erase your personal data 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 our use of your personal data We allow you to opt out of certain processing of your data by using the <u>Viber privacy settings</u> 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 object to our use of your personal data you can object to the
  processing of certain forms of data by contacting our support. Complete this <u>online</u>
  <u>form</u> 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 <u>Viber privacy</u>
  <u>settings</u> on your mobile device.
- The right to receive your personal data in a usable electronic format and transmit it
  to an external party (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 to withdraw consent where we have collected or other process your personal data based on your consent and permissions, at any time, you have the right withdraw your consent.
- The right to lodge a complaint with your local data protection authority.

If you are using our Services from the EEA, UK or you are a California resident, you might have additional rights related to your personal data. Please see our <u>EU Region Privacy</u>
<u>Notice</u> and <u>CCPA Notice</u>, as applicable.

We provide you with the ability to independently exercise certain choices and controls in connection with your personal data – please see details under the "Your Choices" paragraph

above. If you wish to further exercise your rights, please contact us as specified under "Contact Us" section below. We will contact you if we need additional information from you in order to honor your requests.

#### Back to top



At Viber, we take information security seriously and have strict security measures in place to ensure that your account and your personal data are safe. Here you can find information regarding the security measures we have in place.

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal data we process. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal data. We evaluate these measures on a regular basis to ensure the security of the processing. To learn more about our security measures, follow this link: <a href="http://www.viber.com/en/security">http://www.viber.com/en/security</a>.

# Back to top

# Third-Party Websites, Apps and Back-Ups

Our App may contain links to other third-party websites or you may access Apps from a third-party website. We are not responsible for the data collection by such third parties, and their privacy practices and polices shall govern your personal data processed by them.

### Third parties' websites and apps:

If you access or Services and App from any third-party website or other digital source, or access any third-party site from our Services and App, note that, your use and the personal data collected will be subject to such third party's practices and we do not monitor, nor are we responsible for the privacy practices of these third parties.

#### Back-ups:

If you voluntarily choose to back up your Viber conversations, such back-ups are made by independent third parties and kept on your device's service according to operating system's (Google/iOS) terms and policies and are no longer protected by Viber's end-to-end encryption nor Viber has any control over it. This is also true for using Viber Desktop - where your conversations are kept on your personal computer under your security definitions.

# **TrueDepth APIs:**

Starting the end of June 2021 we added a new face lens feature that uses camera capabilities in order to add graphic elements on the user's face. Some lenses can make use of TrueDepth API. TrueDepth API is only active when those lenses are running. It is a very specific feature and none of the Viber lenses will be using it at the moment. Types of lenses

that might use it are virtual try-on, which we don't have. Viber does not collect any data from these sensors or ever store it anywhere. The data never leaves the user's device (so cannot be, and is not, shared by Viber with third parties) and is only used for lens operation.

### Back to top



Our Services are not intended for children under the age of 13 and we do not knowingly collect personal data from individuals under this age.

Our Services are not intended for children under the age of 13. Therefore, we do not knowingly collect personal data via our websites, applications, services, or tools from anyone under 13. In the EEA, certain default privacy settings will be applied to users under the age of 16 and can only be changed if the legal guardian instructs so in writing.

# Back to top

# **Changes to this Privacy Policy**

We may make changes to this Privacy Policy 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 policy (except for technical tweaks), we will notify you of the changes. Where changes to this Privacy Policy will have a fundamental impact on the nature of the collection or use of your personal data, 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. The last modification date of this privacy policy will be reflected in the "Last Updated" header above.

### Back to top

# Contact Us

- Our online form available at: <a href="https://vb.me/ContactUs">https://vb.me/ContactUs</a> please choose the "privacy inquiry" category.
- 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.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your local data protection authority or to the data protection authority of Luxembourg using their website <a href="https://cnpd.public.lu/en.html">https://cnpd.public.lu/en.html</a>.

In the event you read this policy in any language other than English, you agree that in the event of any discrepancies, the English version shall prevail.

Current Privacy Policy PDF Version Viber Privacy Policy March 2022

Previous Privacy Policy PDF Version <u>Viber Privacy Policy November 2019</u>

Previous Policy PDF Version Viber Privacy Policy May 2018

Previous Policy PDF Version Viber Privacy Policy March 2017

Previous Policy PDF Version Viber Privacy Policy September 2016

Previous Policy PDF Version Viber Privacy Policy June 2014