

# Historical record of VirusTotal Privacy Policies

<b>Privacy Policy (February 2017 - May 2018)</b>	<b>1</b>
Collection and use of submitted files, URLs and personal information	2
How we use information we collect	2
Information we share	3
Data Transfers	4
Information security	4
Your Rights	4
Application	5
Enforcement	5
Changes	5
Contact Us	5
<b>Privacy Policy (September 2012 - February 2017)</b>	<b>7</b>
Collection and use of submitted files, URLs and personal information	7
How we use information we collect	7
Information we share	8
Information security	9
Your Rights	9
Application	9
Enforcement	9
Changes	9
Contact Us	9

## Privacy Policy (February 2017 - May 2018)

At VirusTotal, we are keenly aware of the trust users place in us and our responsibility to protect the privacy of user information. As part of this responsibility, we make public what information we collect when someone uses our products and services, why we collect it and how we use it to improve user experience and cybersecurity.

This Privacy Policy sets out the privacy practices of Rotarua Limited ("Rotarua"), a company incorporated under the laws of Ireland with registered number 507502, that owns and develops VirusTotal products and services, including the services offered by the Virustotal.com website ("VirusTotal"). Please make sure that you read this Privacy Policy carefully. By accessing or using VirusTotal, you consent to our use of your personal information in the ways described below.

## Collection and use of submitted files, URLs and personal information

Information we collect to provide you with the services includes:

- **Information you submit in connection with using our services.** This includes the files, URLs, and other information you submit for scanning, information you provide when you join and participate in the VirusTotal community (such as profile information, comments, mentions, and votes), and any information you provide when contacting VirusTotal.
- **Device information:** We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).
- **Log information:** When you use our services or view content provided by VirusTotal, we may automatically collect and store certain information in server logs. This may include: details of how you used our service; Internet protocol address; device event information such as crashes, system activity, hardware settings, browser type, standard HTTP request headers, including but not limited to user agent, referral URL, language preference, date and time; and cookies that may uniquely identify your browser or your VirusTotal Account.
- **Payment information:** To the extent you purchase any premium services offered by VirusTotal, we may collect or receive your credit card and other payment information.
- **Cookies and Local Storage:** We and our partners use various technologies to collect and store information when you visit the website, and this may include sending one or more cookies or randomly generated identifiers to your device. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. Cookies may store user preferences and other information. We use cookies to remember user preferences, such as language, provide users with customized experiences, based on account type, and to prevent abuse. We also use third-party analytics tools (including Google Analytics) to assist us with analysing and improving our services. The "help" portion of the toolbar on the majority of browsers will direct you on how to prevent your browser from accepting new cookies, how to command the browser to tell you when you receive a new cookie, or how to fully disable cookies. However, some of VirusTotal's website features or services may not function properly without cookies. We may also collect and store information using mechanisms such as browser web storage (including HTML5) and application data caches.

## How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new services, and to protect VirusTotal and our users.

This includes using the information to:

- analyse and scan the files and other content you submit;
- develop new services and service features;
- create, publish and update the scan reports available on VirusTotal, including comments, mentions and trusted ratings;
- develop and provide information to the VirusTotal Community;
- create and administer your account;
- understand and improve how our users use and interact with VirusTotal services;
- protect and secure the VirusTotal site and services, including the networks and systems through which we provide the services; and
- process payments for premium services offered by VirusTotal.

When you contact VirusTotal, we may keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services where you have agreed to this. We may also send you administrative messages.

## Information we share

When you submit content to VirusTotal for scanning, we may store it and share it with the anti-malware and security industry (normally the companies that participate in VirusTotal receive content that their engines do not detect as potentially harmful and are catalogued as harmful by at least one other engine). The samples can be analysed by automatic tools and security analysts to detect malicious code and to improve antivirus engines. Our service terms require participating anti-malware and security companies to adhere to VirusTotal's Best Practices when using the samples.

Files, URLs, comments and any other content submitted to or shared within VirusTotal may also be included in premium services offered by VirusTotal to the anti-malware and ICT security industry, with the sole aim of improving research and development activities, expecting it to lead to an overall safer internet and greater end-user protection. Participants include a broad range of cybersecurity professionals focused on product, service, and system security and security products and services.

In addition, we may also share your information in the following circumstances:

- When you sign up to VirusTotal. Your profile, including name, nickname and any information you choose to add to your profile, such as profile picture, will be publicly available on the VirusTotal community. Your activity within the VirusTotal Community, such as comments on files uploaded to VirusTotal, users who mention you in a post to VirusTotal, and users you have “trusted” or who have “trusted” you, will also be included as part of your public profile.
- For external processing. We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- For legal reasons. We will share personal information with affiliates and companies, organisations or individuals outside of VirusTotal if we believe that access, use, preservation or disclosure of the information is reasonably necessary to:
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable Terms of Service, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
  - protect against harm to the rights, property or safety of VirusTotal, our affiliates or users or the public as required or permitted by law.

We may share aggregated, anonymised information publicly and with our partners – like the anti-malware and security industry. For example, we may share information publicly to show statistical trends about the general use of our services.

In the event that VirusTotal is involved in a merger, acquisition or asset sale, we may disclose your personal data to the prospective seller or buyer of such business or assets. You should not share files, URLs, comments or any other content with VirusTotal unless you have authority to share it.

## Data Transfers

VirusTotal processes personal information on servers in many countries around the world. We may process, transfer and/or store your personal information on a server located outside the country where you live. By using VirusTotal you authorise us to transfer your personal information to our affiliates in the United States and to other jurisdictions where the servers we use may be based. Please note that the privacy protections in the United States and other jurisdictions may not be equivalent to those under your local law and the rights of governmental and law enforcement authorities to access your personal information may also differ. When we transfer your information abroad, VirusTotal will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## Information security

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Your Rights

We will let you know if we plan to process your personal data for marketing purposes when we collect it. You can change your mind at any time by contacting us through our contact page.

You have the right to request access to personal information we hold about you. Your right of access can be exercised in accordance with the Data Protection Acts 1988 and 2003 and any successor laws. Any access request may be subject to a statutory fee to meet our costs in providing you with details of the information we hold about you. To submit a request for access to your information, please visit our contact page and provide details so that we can identify your information.

You also have the right to request, in accordance with law, the amendment or deletion of your personal information held by VirusTotal, including the deletion of your account. If you have a VirusTotal account, you may be able to make these changes by logging into your VirusTotal account. If you require further assistance or you do not have a VirusTotal account, please visit our contact page and submit your request.

Please note that we may retain your personal information where necessary for accountability, traceability or for legal reasons disclosed above. We may also reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

## Application

Our website may, from time to time, contain links to and from the websites of our partners and members of the VirusTotal Community. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Enforcement

We will regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Any changes we may make to our Privacy Policy in the future will be posted on this page. Where we make material changes to our Privacy Policy, we will take steps to notify you.

## Contact Us

If you have any questions about this Privacy Policy, please feel free to [contact us](#).

***Privacy Policy Effective Date: 1 February 2017***

***See prior versions of this Privacy Policy below.***

# Privacy Policy (September 2012 - February 2017)

At VirusTotal, we are keenly aware of the trust users place in us and our responsibility to protect the privacy of user information. As part of this responsibility, we make public what information we collect when someone uses our products and services, why we collect it and how we use it to improve user experience and security industry products.

This Privacy Policy sets out the privacy practices of Rotarua Limited ("Rotarua"), a company incorporated under the laws of Ireland with registered number 507502, that owns and develops VirusTotal, including the services offered by the Virustotal.com website ("VirusTotal").

## Collection and use of submitted files, URLs and personal information

Information we collect to provide you with the services includes:

- The files and URLs you upload for antivirus scanning.
- Device information: We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).
- Log information: When you use our services or view content provided by VirusTotal, we may automatically collect and store certain information in server logs. This may include: details of how you used our service; Internet protocol address; device event information such as crashes, system activity, hardware settings, browser type, standard HTTP request headers, including but not limited to user agent, referral URL, language preference, date and time; and cookies that may uniquely identify your browser or your VirusTotal Account.
- **Cookies and Local Storage:** We use various technologies to collect and store information when you visit the website, and this may include sending one or more cookies or randomly generated identifiers to your device. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. Cookies may store user preferences and other information. The "help" portion of the toolbar on the majority of browsers will direct you on how to prevent your browser from accepting new cookies, how to command the browser to tell you when you receive a new cookie, or how to fully disable cookies. However, some of VirusTotal's website features or services may not function properly without cookies. We may also collect and store information using mechanisms such as browser web storage (including HTML5) and application data caches.

## How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new services, and to protect Virus Total and our users.

When you contact VirusTotal, we may keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services where you have agreed to this. We may also send you administrative messages.

Virus Total processes personal information on servers in many countries around the world. We may process, transfer and/or store your personal information on a server located outside the country where you live. When we do so VirusTotal will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## Information we share

When you submit a file to VirusTotal for scanning, we may store it and share it with the anti-malware and security industry (normally the companies that participate in VirusTotal receive files containing virus samples that their engines do not detect and are catalogued as malware by at least one other engine). The samples can be analysed by automatic tools and security analysts to detect malicious code and to improve antivirus engines. Participating anti-malware and security companies will adhere to VirusTotal's Best Practices when using the samples.

Files, URLs, comments and any other content submitted to or shared within VirusTotal may also be included in premium private services offered by VirusTotal to the anti malware and ICT security industry, with the sole aim of improving research activities, expecting it to lead to an overall safer internet and greater end-user protection.

In addition, we may also share your information in the following circumstances:

- **For external processing.** we provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- **For legal reasons.** We will share personal information with companies, organisations or individuals outside of VirusTotal if we believe that access, use, preservation or disclosure of the information is reasonably necessary to:
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable Terms of Service, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
  - protect against harm to the rights, property or safety of VirusTotal, our users or the public as required or permitted by law.

We may share aggregated, anonymised information publicly and with our partners – like the anti-malware and security industry. For example, we may share information publicly to show statistical trends about the general use of our services.

In the event that VirusTotal is involved in a merger, acquisition or asset sale, we may disclose your personal data to the prospective seller or buyer of such business or assets.



You should not share files, URLs, comments or any other content with VirusTotal unless you have authority to share it.

## Information security

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## Your Rights

We will let you know if we plan to process your personal data for marketing purposes when we collect it. You can change your mind at any time by contacting us at [privacy@virustotal.com](mailto:privacy@virustotal.com).

You also have the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Acts 1988 and 2003. Any access request may be subject to a statutory fee to meet our costs in providing you with details of the information we hold about you.

## Application

Our website may, from time to time, contain links to and from the websites of our partners and members of the VirusTotal Community. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Enforcement

We will regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## Contact Us

If you have any questions about this Privacy Policy, please feel free to contact us at [privacy@virustotal.com](mailto:privacy@virustotal.com).

***Privacy Policy Effective Date: 7 September 2012***