

## Dashlane Privacy Policy

Date Last Revised: September 22, 2016

Welcome to Dashlane! Dashlane, Inc. (a Delaware corporation), (“**Dashlane**”, “**we**”, “**us**”, or “**our**”) has prepared this Privacy Policy to describe to you our privacy practices regarding the Information (as defined below) we collect from users of our website at [www.Dashlane.com](http://www.Dashlane.com) (the “**Site**”), the Dashlane software application that enables users to simplify and expedite their experience on the web by storing their data in a secure vault and actively using it to perform online transactional and navigational processes (the “**App**”), and online services available therein (collectively, the “**Services**”).

### What Information does Dashlane collect?

Information You Provide. Dashlane collects information that you voluntarily provide on our Site, App and Services. For example:

- **Registration Information:** When you create a Dashlane account, we ask you to provide an email address that will be used as your login. In addition when you create a Dashlane account we ask you to select a “**Master Password**”. That Master Password is the basis for the encryption key used in protecting your Encrypted Sensitive Information (see below). This Master Password is not known to Dashlane and is not stored in any digital form unless you explicitly ask to do so. When you enable specific services, we may collect additional information that you knowingly provide.
- **Encrypted Sensitive Information:** In order to use the password manager and secure digital wallet you will enter certain information into the App, including highly sensitive information like names, addresses, phone numbers, identity information, credit card information, passwords, receipts for online transactions and secure notes (“**Encrypted Sensitive Information**”). The Encrypted Sensitive Information is encrypted locally on your device using strong encryption and none of it is viewable to Dashlane in unencrypted form. If you choose to synchronize your Encrypted Sensitive Information with more than one device (each an “**Authorized Device**” and the Service, the “**Sync Function**”), the Services are designed to transmit and store the Encrypted Sensitive Information through the Dashlane cloud using strong encryption and in a manner that Dashlane will not be able to read.
- **Billing information:** When you pay for certain services (for example, Premium Services) we will collect all information necessary to complete the transaction, including your name and billing address. Other billing information necessary to complete the transaction, like your credit card information, is collected by our payment processor, but is not made available to Dashlane.
- **Anonymous Usage Information:** As described in more detail in the section headed Information Collected Via Technology, during your use of our Services, we automatically collect certain information and technical data about the use of our Services. This information is anonymized and we cannot link this anonymized usage information with a person.

- **Feedback:** If you provide us feedback or send us an email, we will collect your e-mail address as well as the content of your email in order to communicate with you and send you a reply.
- **Miscellaneous Information.** We also collect other types of information where: (a) you provide it to us voluntarily, for example, if you contact us regarding support for the Services or (b) in the manner disclosed by us at the time that such information is being collected.

Information Collected via Technology. Dashlane collects certain forms of information automatically. For example:

- Log Files. As is true of most digital services, we gather certain information automatically and store it in log files. This information may include IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, clickstream data, your mobile device’s connection logs, operating language, operating system country, device identifiers, location data, and the telephone number. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, better tailor our Services to our users’ needs and for the purposes of fraud detection and authentication.
- Cookies. Like many online services, we use cookies to collect information. “**Cookies**” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs.

Information Collected from You About Others. If you invite someone to create an account through the Services, Dashlane will store the email address of the person you have invited and the message you have sent, in order to send an email and follow up with the third party. We rely upon you to obtain whatever consents from the third party that may be required by law to allow us to access and upload the third party’s names and email addresses as required above. You or the third party may contact us at support@dashlane.com to request removal of this information from our database.

All of the information that is identified as collected in this Section, including the Registration Information, Encrypted Sensitive Information, Billing Information, Anonymous Information and information collected from others is referred to as “**Information**”.

### **How does Dashlane use your Information?**

In general Dashlane uses your Information to either respond to requests that you make, or to aid us in serving you better including in the following ways:

- facilitate the creation of and to secure your account on our network;
- provide you the Services you request;

- identify you as a user in our system and to perform fraud detection and authentication;
- improve the quality and experience when you interact with our Site and Services;
- send you administrative email notifications, such as security or support and maintenance advisories;
- respond to your inquiries and other requests and
- send newsletters, surveys, offers and other promotional materials related to our Services and for other marketing purposes of Dashlane.

**Creation of Anonymous Information.** If we have any information that is identifiable with a particular person, we may create Anonymous Information records from such Information by excluding information that makes the information personally identifiable to you. We reserve the right to use Anonymous Information for any purpose and disclose Anonymous Information to third parties. “**Anonymous Information**” means information that does not, by itself, permit the identification of individual natural persons.

### **How Dashlane shares the information it collects?**

Dashlane discloses your Information as described below and as described elsewhere in this Privacy Policy.

- Sharing Groups. If you create a Sharing Group, Dashlane will share some or all of your Encrypted Sensitive Information (collectively, “**Shared Information**” with the Recipients you designate in your Sharing Group. Shared Information will always be shared with all Recipients in a Sharing Group, however, you may restrict or customize access to Shared Information by designating which Recipients are also granted admin privileges over your Shared Information. You may revoke a Recipient’s access to your Shared Information at any time.
- Emergency Contacts. Our Services enable you to designate emergency contacts who we will contact in the event you are unable to access your account or information therein. If you set an emergency contact, then, upon satisfaction of any conditions you have established as a pre-condition to the release of your account credentials, Dashlane will disclose such information to the designated emergency contact.
- Service Providers. Dashlane may provide your Information to third party service providers (such as its data hosting service provider) in order to: provide you the Services, including those enabled by the Dashlane App; conduct quality assurance testing; facilitate the creation of accounts; provide technical support; and/or provide other services to Dashlane. The Services are designed to ensure that the Encrypted Sensitive Information, when in the possession of Dashlane or any Service Provider, remains encrypted as described in this Privacy Policy and as such unreadable to Dashlane and its Service Providers.
- Fraud Protection. In order to make it less likely that someone will perpetrate a fraud on you, we may provide some portion of the Information, including some Encrypted Sensitive Information, to the financial institution that issued your credit card or that

operates your credit card network (collectively, “**Credit Card Companies**”). We provide such Information to the Credit Card Companies solely for the purpose of assisting them in preventing fraud. We make this information available to Credit Card Companies using a public-private key so it remains unreadable to Dashlane and its Service Providers.

- Corporate Restructuring. If another company acquires our company, business, or assets, that company will possess the Information collected by us and will assume the rights and obligations regarding your Information as described in this Privacy Policy. Accordingly, we may share some or all of the Information in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Information may also be transferred as a business asset.
- Affiliates. We may share some or all of your Information with our parent company, subsidiaries, joint ventures, or other companies under a common control (“**Affiliates**”), in which case we will require our Affiliates to honor this Privacy Policy.
- Other Disclosures. Regardless of any choices you make regarding your Information (as described below), Dashlane may disclose your Information if it believes in good faith that such disclosure is necessary (a) to comply with relevant laws or to respond to subpoenas or warrants served on Dashlane; (b) to protect or defend the rights or property of Dashlane or other Dashlane App users; and/or (c) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Service, which are located at <http://www.Dashlane.com/en/terms/>.

### **How secure is your Information?**

The security of the Information that you enter in the Dashlane App is extremely important to Dashlane. This is why Dashlane implements a variety of security measures, including AES 256 bit encryption designed to prevent unauthorized access, alteration, and use of your Encrypted Sensitive Information. While Dashlane has gone to great lengths to protect your Information, no method of transmission over the Internet, or method of electronic storage, is 100% secure; therefore, Dashlane cannot guarantee its absolute security. In addition, the security of your Information also depends on how you use the Dashlane App and Services and protect the Master Password that enables you to access your Dashlane account and decrypt your Encrypted Sensitive Information. We therefore strongly recommend that you carefully read and implement the Dashlane security guidelines available here: <https://www.Dashlane.com/en/security/>.

### **How can you access and manage your Information?**

Changing Your Information. You can access and rectify your Information directly on the Dashlane App. For any question or concern you may have with respect to your Information, you can contact: [support@Dashlane.com](mailto:support@Dashlane.com).

Email Communications. With your consent, we will periodically send you free newsletters and emails that directly promote the use of our Site and Services, including important best practices and guidance on how to optimize your use of the Dashlane App. When you receive newsletters and promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the email you receive. You may also send us an email at the following address: support@Dashlane.com. Despite your indicated email preferences, we may send you service related communications, including notices of any updates to our Terms of Service and Privacy Policy.

Applications. You can stop all collection of information by the App by uninstalling the App. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

## **Disputes**

If you choose to use the Dashlane App, such use and any dispute over privacy is subject to this Privacy Policy and to our Terms of Service Agreement. <http://www.Dashlane.com/terms/>.

## **Changes to Privacy Policy**

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Information, we will notify you by sending you an e-mail to the last e-mail address you provided to us. Any changes to this Privacy Policy will be effective upon the date specified in the notice within the email or on the Site. We will use reasonable commercial efforts to provide you no less than seven (7) days’ notice of any change. Please note that at all times you are responsible for updating your Information to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. If you do not wish to permit changes in our use of your Information, you must notify us prior to the effective date of the changes that you wish to deactivate your account with us. Continued use of the Services, following notice of such changes shall indicate your acknowledgement of such changes.

## **Questions; Contacting Dashlane; Reporting Violations.**

If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or phone number:

Dashlane, Inc.  
*Attn:* Chief Financial Officer  
156 Fifth Avenue, Suite 504  
New York, NY 10010